

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



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UPDATED INFORMATION ON ILLEGAL TRADE IN EUROPEAN EEL (*ANGUILLA ANGUILLA*)

This document is submitted by Spain as Chair of the Standing Committee intersessional working group on European eel (*Anguilla anguilla*) in relation to agenda item 52.*

* *The geographical designations employed in this document do not imply the expression of any opinion whatsoever on the part of the CITES Secretariat (or the United Nations Environment Programme) concerning the legal status of any country, territory, or area, or concerning the delimitation of its frontiers or boundaries. The responsibility for the contents of the document rests exclusively with its author*

Illegal trade report

According to the Decision 17.186 paragraph a, the CITES Secretariat contracted the Zoological Society of London (ZSL) to prepare a study compiling information on challenges and lessons learnt with regards to implementation of the Appendix II listing of European Eel (*Anguilla anguilla*) and its effectiveness, including enforcement and illegal trade (See document AC30 Doc. 18.1 Annex 1).

With respect to illegal trade and enforcement, the aforementioned report found that the black-market trade in live *Anguilla anguilla* increased significantly due to restricted availability caused by the establishment of fishing and/or export quotas and trade bans, as well as maintaining glass eel demand for eel aquaculture in East Asia. Similar patterns were noted by ZSL in other anguillid eel species.

The challenges discussed in the report are:

1. Mis-declaration of *Anguilla anguilla*:

Mis-declaration has been identified as a method to circumvent controls. Between March 2009 and December 2010 there was the risk that the EU re-importing quantities were much larger than originally exported due to the lack of traceability along the eel supply chain.

2. Smuggling:

The concealment of trade in live *Anguilla anguilla* and eel products with the intention to circumvent controls has been documented by various sources including CITES authorities and media publications. Known smuggling methods include:

- transporting shipments via air freight containers of other goods;
- hiding specimens in personal baggage;
- travelling via road; and
- shipping specimens from the EU through North Africa en route to Asia.

Seizure information provided by EU Member States reveal that European glass eels have been smuggled on a commercial scale via air freight whereby specimens are hidden within shipments of other fishery products or labelled as a different *Anguilla* species.

The authorities have reported the involvement of organized criminal networks in the movement of legally and illegally sourced European glass eels from the EU to East Asia.

3. Enforcement challenges:

In addition to changes in legislation, the dynamics of smuggling operations, concealment methods and transport routes being used, the report considers that enforcement officers face challenges with regard to handling and identifying eel species.

Handling glass eel is problematic due to the transport method (boxes with humidity and oxygenated atmosphere prepared to survive 36 hours) and the high value of the commodity. Even randomized inspections of shipments for enforcement purposes could lead to considerable losses for a legitimate trader.

Furthermore, finding suitable storage facilities, adequate transport and release locations is difficult.

Although combating illegal eel trade in the EU may be a priority for CITES enforcement officials, detection of eels is not necessarily considered a priority for security and baggage controls at airports.

Species identification of genus *Anguilla* is a very complex issue. Identification of juvenile *Anguilla* species cannot always be accurately carried out using photos and keys. In the case of glass eels in trade, at present, the most effective solution is species identification by DNA analysis that has to be carried out by an accredited scientific institution.

London Workshop

According to the Decision 17.186 paragraph f) an international technical workshop on eels (*Anguilla* spp.) was held in the Royal Botanic Gardens Kew, London, UK, (18-20 April 2018).

The meeting was convened by the CITES Secretariat and participants included eel range States, trading countries, the Food and Agriculture Organization of the United Nations (FAO), the Convention on Migratory Species (CMS), the IUCN Anguillid Eel Specialist Group, the ICES/GFCM/EIFAAC Working Group on Eel (WGEEL), the Sustainable Eel Group (SEG), eel farmers and other eel and fisheries experts.

During the workshop three working groups (WG) were formed to consider:

1. The implementation of the current listing of European eel (*Anguilla anguilla*) in CITES Appendix II;
2. Illegal trade in *Anguilla anguilla* and;
3. The conservation and sustainable management of non-CITES listed *Anguilla* species.

Although there was a specific WG on illegal trade, other related issues were also discussed in other WGs, for example, how to take into account illegal take or trade when making an NDF.

During the discussions of the working group on illegal trade the same or similar issues outlined in the previous study were raised.

The WG on illegal trade discussed how best to quantify the illegal trade in European eel. Discussions centred on identifying the actual amount of *Anguilla anguilla* being illegally traded in Europe, which intelligence indicates could be as high as 100 tons annually. This amount has been estimated on the basis of the documentation seized in the different operations where the quantities illegally exported were reflected. Questions were raised about how reliable this data was and the accuracy of the figure. This is a very important question to solve because it has been very difficult to get data on interventions of glass eel for this WG.

It was noted that one Chinese organized criminal gang is now providing suitcases for couriers which all appear to be one brand but in different colors, which is an important piece of intelligence to be captured and disseminated.

Respecting enforcement matters, evidence was provided by Spain of a change in “*Modus operandi*” by eel smugglers who are now using 6 x 2 kg bags in each suitcase rather than 12 x

1kg bags probably to increase the chances of survival, with larger bags having a greater capacity for oxygen.

Respecting recording seizures, after a lengthy debate, there was general agreement that for recording of dead specimens as BOD (Bodies) or MEA (Meat), it would be preferable to record weight in kilograms.

To confirm the species and to help enforcement officers, forensic methodologies were identified as a potential solution to origin issues. It was highlighted that the testing has to be carried out on a level that is admissible in court.

In terms of restocking of seized specimens, concerns were raised and the group discussed the need for a review of restocking procedures in the EU.

Seizures

The table in Annex 1 shows the known seizures of *Anguilla anguilla* between 2012 and 2018. In summary, the amount of confiscated specimens of *Anguilla anguilla* during this period was as follows:

- Glass eel: 18 947 Kg (net weight)
- Meat: 66 886,4 Kg (net weight)

The countries/territories where seizures of *A. anguilla* glass eel have occurred are: Bulgaria, China, Cyprus, France, Germany, Greece, Hong Kong SAR, Hungary, Italy, Morocco, Philippines, Poland, Portugal, Spain, Thailand, the Netherlands and the United Kingdom. Meat was seized in Canada, Germany, Poland and Spain.

Seizure data was organised into glass eel seasons in Figure 1 which highlights the increase in reported confiscations over recent years. This increase is likely due to a range of factors, but it is important to highlight the effectiveness of recent cross-border and cross agency collaborations in Europe that have played a key role in this (Figure 2).

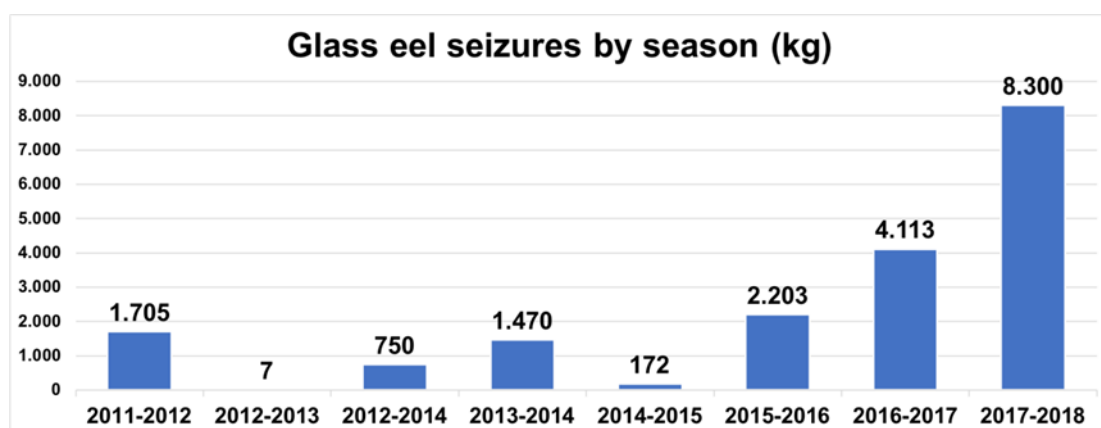


Figure 1. Glass eel seizures by season (kg) between 2011 – 2018

Figure 2 shows the proportion of glass eel seizures in Europe and Asia between 2012 and 2018.

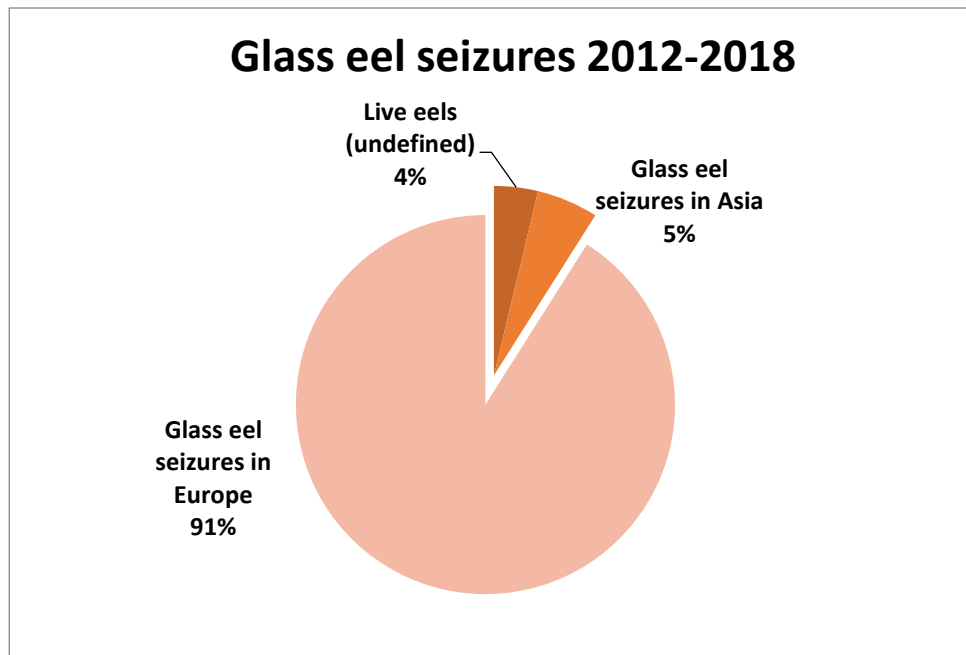


Figure 2. Proportion of glass eel seizures in Europe and Asia between 2012 and 2018.

Summary of conclusions

Taking into account the data reported about illegal trade on *Anguilla anguilla*, the results obtained from the study made by the Zoological Society of London (Document AC30 Doc. 18-01-A1) and the conclusions of the international technical workshop on eels (*Anguilla* spp.) held in the Royal Botanic Gardens Kew, London, UK and focusing only on what affects the illegal trade, we can summarize the following:

- It is very difficult to obtain reliable data on seizures. Reporting of seizures to CITES and the sharing of seizure information both in export and import countries needs to be significantly improved.
- Effective enforcement relies on Europe-wide as well as global collaboration. Improved communication and collaboration within and between range States and importing countries are essential to deal with illegal trade.
- In the years following the CITES listing and associated EU trade ban, the illegal trade in *Anguilla anguilla* glass eels increased significantly in order to meet the demand in East Asia.
- The listing, associated EU ban, and variable recruitment in *A. japonica* has shifted trade to non-EU *Anguilla anguilla* range States and/or other *Anguilla* species, and resulted in an increase in illegal trade.
- The dynamics of smuggling operations to evade controls have become more organized and sophisticated in recent years.
- Illegal traders are regularly developing new ways to avoid detection.
- All seizures of *Anguilla anguilla* should be DNA tested to confirm the species and to a standard that would be admissible in court.

- The return of seized eels to the wild requires a better understanding of the impact of this practice. In order to minimize potential risk in terms of biosecurity and any negative effects on the resident eel population, and wider freshwater ecosystem resulting from releasing eels, the development of guidelines/protocols for good practice should be considered.
- A harmonised traceability system across the species range is presently lacking. The establishment of a traceability mechanism for *Anguilla anguilla* would help to prevent illegally harvested and/or traded specimens entering the supply chain – this is a requirement that is relevant to CITES but is also stated in Article 12 of EU Council Regulation (EC) No 1100/2007.
- The United Nations Office on Drugs and Crime (UNODC) is currently conducting a case study on the global trade in illegally acquired glass eels for the 2nd Wildlife Crime Report which will be published in spring 2019. The study focusses on the triangulation of data on supply, trafficking and demand.
- To estimate illegal trade, it will be necessary to take into account not only the information provided by the enforcement operations but also the annual demand for aquaculture and/or restocking, both in European eel range states and other states, and the gaps between declared glass eel catch and farm/restocking input.
- The information submitted to AC30 by Algeria, Morocco, Tunisia and Turkey as part of the RST process suggest that most European eel range states do not allow export of glass eels, and as such, the inputs to East Asian farms should in reality be low.

Annex 1

This has been elaborated with the help of the United Nations Office on Drugs and Crimes (UNODC) and the Sustainable Eel Group (SEG) taking into account the following sources and documents:

- ¹Seizures reported by countries involved
- ²AC30 -18-01-A1. Study made by the Zoological Society of London
- ³SC69 Doc. 47.2
- ⁴SC70 Doc. 45
- ⁵SC70 Doc. 45, Annex 1
- ⁶Crook, V. (2014). Slipping away: International Anguilla eel trade and the role of the Philippines. TRAFFIC and ZSL, UK.
- ⁷Information and press releases from Customs China, AFCD Hong Kong SAR, Hong Kong customs and media publications

Place of seizure	Year	Season	Date	Commodity	Quantity (Kg)	Direction
Bulgaria, Sofia ⁶	?	2011-2012	2011-12	Live glass eels	120	Export (from the EU)
Spain ¹	2012	2011-2012	2012-00	Live glass eels	530	Export (from the EU)
Spain ¹	2012	2011-2012	2012-00	Live glass eels	48	Export (from the EU)
Spain ¹	2012	2011-2012	2012-00	Live glass eels	20	Domestic
Spain ¹		2011-2012	2011-2012	Live glass eels	1 585	Export (from the EU)
France ³	2013	2012-2013	2013-01-08	Live glass eels	7	Internal (EU)
Spain ¹	?	2012-2014	2012-2014	Live glass eels	750	Export (from the EU)
Spain ³	2013	2013-2014	2013-08-11	Meat	24 000	Export (from the EU)
France ³	2013	2013-2014	2013-11-25	Live glass eels	70	Internal (EU)
Italy ³	2013	2013-2014	2013-12-20	Live eels	600 specimen	Internal (EU)
Portugal ³	2013	2013-2014	2013-12-00	Live eels	270	Export (from the EU)
Portugal ¹	?	2013-2014	2013/2014	Live glass eels	798	Export (from the EU)
Spain ¹	2014	?	2014-00	Live glass eels	0.3	Domestic
France ³	2014	2013-2014	2014-02-19	Live glass eels	312	Internal (EU)
Hungary ³	2014	2013-2014	2014-04-23	Live glass eels	182	Export/Import
Portugal ³	2014	2013-2014	2014-02-00	Live eels	272	Export (from the EU)
Hong Kong SAR ³	2014	2013-2014	2014-04-00	Live glass eels	108	Import (into Hong Kong SAR)
China ³	2014	2013-2014	2014-01-14	Live glass eels	n/a	Import (Into China)
Italy ³	2014	2014-2015	2014-12-11	Live eels	500 specimens	Internal (EU)
Portugal ³	2014	2014-2015	2014-12-22	Live glass eels	15	Internal (EU)
Germany ³	2014	2014-2015	2014-11-24	Meat	10	Import (into the EU)
Spain ¹	2015	?	2015-00	Live glass eels	25	Domestic
Spain ¹	2015	?	2015-00	Live glass eels	8.5	Export (from the EU)
Spain ¹	2015	?	2015-00	Meat	135	Import (EU)
Bulgaria ³	2015	2014-2015	2015-01-21	Live glass eels	37	Import (into the EU)
Poland ³	2015	2014-2015	2015-04-06	Meat	534.8	Export (from the EU)
Poland ³	2015	2014-2015	2015-04-14	Meat	20.6	Import (into the EU)
France ³	2015	2014-2015	2015-02-06	Live glass eels	120	Export (from the EU)
France ³	2015	2014-2015	2015-03-18	Live eels	11.8	Import (into the EU)
France ³	2015	2014-2015	2015-03-20	Live eels	6.5	Export (from the EU)
France ⁷	2016	2015-2016	2015-11 to 2016-04	Live glass eels	2.6	Internal (EU)
France ⁷	2016	2015-2016	2015-11 to 2016-04	Live eels	124	Internal (EU)
Germany ³	2015	2015-2016	2015-09	Meat	24 000	Import (into the EU)
Cyprus ³	2015	2015-2016	2015-11	Meat	100	Import (EU)
France ³	?	?	no date	Live glass eels	42	Export (from the EU)
Portugal ¹	?	2015-2016	?	Live glass eels	380	Export (from the EU)
Spain ¹	?	2015-2016	?	Live glass eels	700	Export (from the EU)
France ^{3,4}	2016	2015-2016	2016-01-16	Live glass eels	25	Internal (EU)
France ⁴	2016	2015-2016	2016-01-28	LIV	124	Internal (EU)
France ^{3,4}	2016	2015-2016	2016-02-10	Live glass eels	163	Internal (EU)
Hong Kong SAR ³	2016	2015-2016	2016-01-05	Live glass eels	109	Import (into Hong Kong SAR)
Spain, Madrid ⁴	2016	2015-2016	2016-01-13	Live glass eels	70	Export (from the EU)

Place of seizure	Year	Season	Date	Commodity	Quantity (Kg)	Direction
Spain, Madrid ⁴	2016	2015-2016	2016-01-21	Live glass eels	21	Export (from the EU)
Spain ⁴	2016	2015-2016	2016-01-22	LIV	15.5	Export (from the EU)
United Kingdom ⁴	2016	2015-2016	2016-01-26	LIV	3	Export (from the EU)
Spain, Madrid ⁴	2016	2015-2016	2016-02-19	Live glass eels	36	Export (from the EU)
Spain, Madrid ¹	2016	2015-2016	2016-02-22	Live glass eels	23	Export (from the EU)
Hong Kong SAR ³	2016	2015-2016	2016-02-10	Live glass eels	48	Import (into Hong Kong SAR)
Spain, Madrid ⁴	2016	2015-2016	2016-02-24	Live glass eels	44	Export (from the EU)
Hong Kong SAR ³	2016	2015-2016	2016-02-25	Live glass eels	30	Import (into Hong Kong SAR)
Spain ³	2016	2015-2016	2016-02	Live glass eels	36	Export (from the EU)
Spain ³	2016	2015-2016	2016-02/03	Live glass eels	86	Export (from the EU)
Spain ³	2016	2015-2016	2016-03-01	Live glass eels	111	Export (from the EU)
Hong Kong SAR ³	2016	2015-2016	2016-03-04	Live glass eels	91	Import (into Hong Kong SAR)
Hong Kong SAR ³	2016	2015-2016	2016-03-07	Live glass eels	63	Import (into Hong Kong SAR)
Spain, Madrid ¹	2016	2015-2016	2016-03-07	Live glass eels	83	Export (from the EU)
Spain, Madrid ⁴	2016	2015-2016	2016-03-08	Live glass eels	41	Export (from the EU)
France ³	2016	2015-2016	2016-03-24	Live glass eels	2	Internal (EU)
Domestic market - suitcase ready for check-in ¹	2016	2015-2016	2016-03-28	Live glass eels	8	Export (from the EU)
Domestic market - suitcase ready for check-in ¹	2016	2015-2016	2016-04-12	Live glass eels	30	Export (from the EU)
Hong Kong SAR ³	2016	2016-2017	2016-11-09	Live glass eels	14	Import (into Hong Kong SAR)
Italy ³	2016	2016-2017	2016-12-15	Live eels (BOD)	35	Import (into the EU)
Hong Kong SAR ³	2016	2016-2017	2016-12-05	Live glass eels	76	Import (into Hong Kong SAR)
France ³	2017	2016-2017	2017-01-16	Live glass eels	792	Export (from the EU)
Spain, Madrid ¹	2017	2016-2017	2017-02-14	Live glass eels	48	Export (from the EU)
France ³	2017	2016-2017	2017-02-03	Live glass eels	200	Export (from the EU)
France ⁷	2017	2016-2017	2017-02	Live glass eels	11	Internal (EU)
France ⁷	2017	2016-2017	2017-03-10	Live glass eels	3	Internal (EU)
France ³	2017	2016-2017	2017-03-06	Live glass eels	200	Internal (EU)
Greece/Spain ³	2017	2016-2017	2017-03	Live glass eels	2 000	Export (from the EU)
United Kingdom ³	2017	2016-2017	2017-03	Live glass eels	200	Export (from the EU)
China ³	2017	2016-2017	2017-03	Live glass eels	88	Import (Into China)
Hong Kong SAR ³	2017	2016-2017	2017-03-09	Live glass eels	24.9	Import (into Hong Kong SAR)
Hong Kong SAR ³	2017	2016-2017	2017-03-10	Live glass eels	14.8	Import (into Hong Kong SAR)
Hong Kong SAR ³	2017	2016-2017	2017-03-16	Live glass eels	14.3	Import (into Hong Kong SAR)
China, Guangzhou ⁷	2017	2016-2017	2017-03-24	Live glass eels	88	Import (into China)
Portugal, Bilbao ¹	2017	2016-2017	2017-03-28	Live glass eels	40	Export (from the EU)
China, Guangzhou ⁷	2017	2016-2017	2017-03-29	Live glass eels	43 bags	Import (Into China)
Hong Kong SAR ³	2017	2016-2017	2017-04-01	Live glass eels	25.4	Import (into Hong Kong SAR)
Netherlands ³	2017	2016-2017	2017-04	Live glass eels	72	Export (from the EU)
China ³	2017	2016-2017	2017-04	Live glass eels	68 bags	Import (Into China)
China ³	2017	2016-2017	2017-04-30	Live glass eels	200	Import (Into China)
Portugal ⁵	2017	2017-2018	2017-11	Live eels	45	Export (from the EU)
Portugal ⁵	2017	2017-2018	2017-11	Live glass eels	90	Export (from the EU)
Italy ⁵	2017	2017-2018	2017-11	Live glass eels	5 specimen	Export (from the EU)
France ⁵	2017	2017-2018	2017-12	Live glass eels	0,2	Internal (EU)
France ⁵	2017	2017-2018	2017-12	Live glass eels	15	Internal (EU)
Spain ⁵	2017	2017-2018	2017-12	Live glass eels	45.4	Export (from the EU)
France ⁵	2017	2017-2018	2017-12	Live glass eels	1	Unknown?
France ⁵	2017	2017-2018	2017-12	Live glass eels	1	Internal (EU)
Spain ⁵	2017	2017-2018	2017-12	Live glass eels	12.1	Export (from the EU)
France ⁵	2017	2017-2018	2017-12	Live glass eels	1	Internal (EU)
Spain ⁵	2017	2017-2018	2017-12	Live glass eels	7	Export (from the EU)
Spain ⁵		2017-2018	2017-12	Live glass eels	7	Export (from the EU)
Spain ⁵	2017	2017-2018	2017-12	Live glass eels	65	Export (from the EU)
Spain ¹	2017	?	2017-00	Live glass eels	134.7	Domestic
Spain ¹	2017	?	2017-00	Live glass eels	18	Export (from the EU)
Spain ¹	2017	?	2017-00	Meat	4	Export
Spain ¹	2017	?	2017-00	Meat	62	Import (EU)
Spain ¹	2017	?	2017-00	Meat	20	Domestic
Spain ¹	2018	2017-2018	2017/2018	Live glass eels	2 441.8	Export (from the EU)
Portugal ¹	?	2017-2018	?	Live glass eels	500,1	IUU
Portugal ¹	?	2017-2018	?	Live glass eels	944.2	Export (from the EU)

Place of seizure	Year	Season	Date	Commodity	Quantity (Kg)	Direction
Portugal ¹	?	2017-2018	?	Frozen glass eels	109.7	consumption market?
Portugal ⁵	2018	2017-2018	2018-01	Live glass eels	317	Export (from the EU)
Portugal ⁵	2018	2017-2018	2018-02	Live glass eels	50	Export (from the EU)
Portugal ¹	?	2017-2018	2017/2018	Live glass eels	995	Export (from the EU)
France ⁷	?	2017-2018	2017/2018	Live glass eels	1 200	
Thailand ⁵	2018	2017-2018	2018-01	Live glass eels	10	Import (Transit)
Spain ⁵	2018	2017-2018	2018-02	Live glass eels	250	Export (from the EU)
Spain ⁵	2018	2017-2018	2018-02	Live glass eels	60	Export (from the EU)
Italy ⁵	2018	2017-2018	2018-02-13	Live glass eels	443	Export (from the EU)
Hong Kong SAR ⁵	2018	2017-2018	2018-02	Live glass eels	14.7	Import (into Hong Kong SAR)
Hong Kong SAR ⁵	2018	2017-2018	2018-02	Live glass eels	14	Import (into Hong Kong SAR)
Morocco ⁵	2018	2017-2018	2018-03	Live glass eels	60	Export
Spain ⁵	2018	2017-2018	2018-04	Live glass eels	460	Internal/export (from EU)
Hong Kong SAR ⁵	2018	2017-2018	2018-04	Live glass eels	15.9	Import (into Hong Kong SAR)
Hong Kong SAR ⁵	2018	2017-2018	2018-04	Live glass eels	14.6	Import (into Hong Kong SAR)
Hong Kong SAR ⁵	2018	2017-2018	2018-04	Live glass eels	30.4	Import (into Hong Kong SAR)
France ⁷	2017	2016-2017	2017-01-29	Live glass eels	1.2	Internal (EU)
France ¹	2018	2017-2018	2018-04-06	Live glass eels	123.1	Domestic
Canada ⁵	2018	2017-2018	2018-05	Meat	18 000	Import from Asia
Morocco ⁵	2018	2017-2018	2018-07	Live glass eels	78	Export
France ⁷	2018	2017-2018	2018-05-03	Live glass eels	33	Export (from the EU)