

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

Sixty-ninth meeting of the Standing Committee
Geneva (Switzerland), 27 November -1 December 2017

Species specific matters

Eels (*Anguilla* spp.)

ILLEGAL TRADE IN *ANGUILLA ANGUILLA*

1. This document has been submitted by the European Union (EU).*
2. The European Eel *Anguilla anguilla* was listed in CITES Appendix II at CoP14 in 2007 and the listing came into force in March 2009. Due to its depleted status within Europe, the EU has been unable to make a positive non-detriment finding for the species since December 2010. Currently export and import of this species from and into the EU is not permitted, and all EU Member States have published a zero export quota for European Eel since 2011. To improve the conservation status of the species, the EU adopted in 2007 a domestic legislation¹ on eel conservation, establishing measures for the recovery of the stock of European Eel. In accordance with the obligations set out in this Regulation, Member States of the EU have developed species management plans at national level, which include management measures (e.g. reduction in fisheries, improving river continuity, reducing pollution).
3. Since the introduction of the EU trade suspension for *A. Anguilla*, illegal export of live juvenile eels (glass eels) from the EU to third countries has substantially increased. The information available suggests that glass eels traded illegally from the EU are shipped to farming facilities in Asia, where they are kept until they reach their adult size and further re-exported to their final market, sometimes mixed with other eel species. Peaks in illegal trade in *A. anguilla* usually take place during the fishing season for glass eels, which runs from October to Spring. The illegal trade in glass eels of *A. anguilla* is jeopardising efforts for the recovery of the species and undermining the implementation of the Convention. It should be noted that the legal and illegal international trade in other eel species has also increased in recent years².
4. Recalling that CITES Decision 17.189 directs the Standing Committee to “*consider information relating to illegal trade in European eel at its 69th and 70th meetings and adopt recommendations as appropriate*”, the present document provides an update on the latest trends in detected cases of illegal trade in European Eel.
5. Table 1 provides a non-exhaustive summary of *A. anguilla* seizure information for 2013-2017 collated from a variety of sources – CITES Biennial Reports, EU Member State seizures reports, EU-TWIX, Europol, the Sustainable Eel Group and media reports. These include internal (illegally fished eels) and external seizures (on both import and export) and provide further evidence that illegal trade, in particular exports of *A. anguilla* glass eels, has continued in recent years.
6. The available seizure information suggests a rampant illegal trade in the species, with shifting and complex (i.e. indirect) trade routes and modes of shipment to avoid detection. Recent investigations in the EU point

* *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.*

¹ Council Regulation (EC) No. 1100/2007.

² <https://cites.org/sites/default/files/eng/cop/17/WorkingDocs/E-CoP17-51.pdf>

to the involvement of organized criminal networks in this illegal trade, which reportedly use falsified documents and launder the large profits generated through their illegal operations. According to the latest investigations in 2017, 10 tonnes of European Eel are believed to have been smuggled in the 2016-2017 fishing season from the EU to China, with a profit estimated at EUR 10 million. Evidence from recent enforcement operations point to the involvement of actors in the source, transit and destination countries.

7. Addressing illegal trade in *A. anguilla* is a priority for enforcement agencies from the EU Member States. Together with the European Union's law enforcement agency (Europol), they have strengthened their efforts against eel trafficking and carried out joint operations to dismantle the criminal networks organising it. Operational activities during the fishing season 2016-2017 have seen 48 persons arrested and 4 000 kg of glass eels seized, amounting to a total value of approximately EUR 4 million³. In view of the transnational nature of eel trafficking, international enforcement cooperation needs to be increased to tackle this illegal trade effectively, especially through sharing of intelligence via appropriate channels, carrying out joint enforcement operations and the identification and prosecution of the leaders of the criminal networks driving this trade in demand countries.

Recommendation

8. The Standing Committee is invited to:
 - a) take note of the document, and
 - b) encourage all range, export, transit and import countries to strengthen their cooperation in addressing international illegal trade in *Anguilla anguilla*.

³ <https://www.europol.europa.eu/newsroom/news/eu-law-enforcement-step-efforts-to-protect-environment-%E2%80%93-48-arrested-for-trafficking-endangered-species>

Table 1 - *Anguilla anguilla* seizure information for 2013-2017 collated from a variety of sources.

Source: 2013-2014 CITES Biennial Reports, EU Member State seizures reports, EU-TWIX database and mailing list, Europol, the Sustainable Eel Group and open sources (such as press releases by enforcement agencies or, in a few cases, media reports).

Country of seizure	Date	Commodity	Quantity, kg ⁴	Direction of trade	Seizure/Route details
France	08/01/2013	Live glass eels	7.0	Internal (EU)	Seized from a vehicle on a road, illegally fished
Spain	11/08/2013	Meat	24 000.0	Export (from the EU)	Seizure made at a maritime port, shipment did not have CITES documentation
France	25/11/2013	Live glass eels	70.0	Internal (EU)	Seized from a vehicle, illegally fished
Italy	20/12/2013	Live eels	600 specimens	Internal (EU)	Italian origin, illegally fished
Portugal	00/12/2013	Live eels	270.0	Export (from the EU)	Found in air freight hidden amongst other goods, on way to China
France	19/02/2014	Live glass eels	312.0	Internal (EU)	Seized from a vehicle, illegally fished
Hungary	23/04/2014	Live glass eels	182.0	Export/Import	Seized at Budapest airport, Hungary from two Chinese citizens in personal luggage, based on intelligence information received from the Spanish CITES Management Authority. Destination of the shipment would have been Hong Kong SAR via Moscow, Russian Federation . Shipment was first smuggled out from the EU and sent back in Moscow, being seized on arrival to Budapest. Eels originated in Spain .
Portugal	00/02/2014	Live eels	272.0	Export (from the EU)	Two airport seizures, found in freight hidden amongst other goods, with wrong Customs code being used, on way to China
Hong Kong SAR	00/04/2014	Live glass eels	108.0	Import (into Hong Kong SAR)	Customs documentation showed that other glass eel shipments had left from Budapest airport, Hungary on 21/04/2014, destined for Hong Kong SAR. Hungarian authorities informed Hong Kong CITES authorities and based on this information Hong Kong SAR seized two glass eel shipments, also originating from Spain .
Italy	11/12/2014	Live eels	500 specimens	Internal (EU)	Italian origin, illegally fished
Portugal	22/11/2014	Live glass eels	15.0	Internal (EU)	Seized at a river port, illegally fished, believed to be destined for China
Germany	24/11/2014	Meat	10.0	Import (into the EU)	Seized in air freight coming from Egypt
China	14/01/2014	Live glass eels	n/a	Import (into China)	Twelve boxes of eel fry carried by a passenger from Germany without documents were seized at Beijing Airport. Shipment was on its way to Fujian Province.

⁴ Seizure reports often do not specify if the amount seized is net or gross mass (i.e. if the mass includes the fish only or if it also includes the water in which they were transported).

Country of seizure	Date	Commodity	Quantity, kg ⁴	Direction of trade	Seizure/Route details
Bulgaria	21/01/2015	Live glass eels	37.0	Import (into the EU)	Sofia Airport, Bulgaria : X-ray inspection found glass eels in luggage of two Chinese citizens arriving from Madrid, Spain . Eels were in eight Styrofoam containers, declared as food and were reportedly bought at a market in Spain.
Poland	06.04.2015	Meat	534,75	Export (from the EU)	On 06.04.15 at the road border point with the Russian Federation , customs seized 534,75 kg of frozen eels concealed in one of the walls of a car, designed to be exported from the EU. DNA tests proved it was European eels (<i>Anguilla anguilla</i>).
Poland	14.04.2015	Meat	20,6	Import (into the EU)	On 14.04.15 at the same border point (as above) Customs seized 20,6 kg of frozen European eel (<i>Anguilla anguilla</i>) specimens. This time it was an import attempt from the Russian Federation . Goods were not concealed. Species identification was based on DNA testing.
France	06/02/2015	Live glass eels	120.0	Export (from the EU)	Seized at airport, freight destined for Hong Kong SAR . Eels in 12 boxes, declared "Small eels", origin UK
France	18/03/2015	Live eels	11.8	Import (into the EU)	Seized on a road, unknown country of origin
France	20/03/2015	Live eels	6.5	Export (from the EU)	Seized at airport, destined for French Polynesia
Germany	09/2015	Meat	24 000.0 ⁵	Import (into the EU)	Found in a container from China at a maritime port based on an investigation
Cyprus	11/2015	Meat	100.0	Import (EU)	Detected in a container from China . DNA testing was conducted by Germany before releasing the shipment to Cyprus
France	no date	Live glass eels	42.0	Export (from the EU)	Seized at airport, originating in Spain , destined for China , found in personal baggage
France	2016	Live glass eels	25.0	Internal (EU)	Found inside a vehicle on the way to Spain
France	2016	Live glass eels	163.0	Internal (EU)	Found inside a vehicle during random control
France	2016	Live glass eels	2.0	Internal (EU)	Found inside a vehicle during random control
Hong Kong SAR	01/2016	Live glass eels	109.0	Import (into Hong Kong SAR)	The shipment arrived by air from Spain via the UAE , in personal baggage. Four passengers were arrested
Hong Kong SAR	02/2016	Live glass eels	48.0	Import (into Hong Kong SAR)	The shipment arrived by air from Spain via France , in personal baggage

⁵ Only 15-20% of the meat have been identified as meat from *Anguilla anguilla*. The remaining rest was meat from other *Anguilla* species.

Country of seizure	Date	Commodity	Quantity, kg ⁴	Direction of trade	Seizure/Route details
Hong Kong SAR	02/2016	Live glass eels	30.0	Import (into Hong Kong SAR)	The shipment arrived by air from Portugal via the UAE , in personal baggage
Spain	02/2016	Live glass eels	36.0	Export (from EU)	The shipment was found in personal baggage at an airport destined to China via France
Spain	02-03/2016	Live glass eels	86.0	Export (from EU)	Two seizures: the shipments were found in personal baggage at an airport destined to China via the Netherlands
Spain	01/03/2016	Live glass eels	111.0	Export (from EU)	Four seizures: the shipments were found in personal baggage at an airport destined to Hong Kong SAR
Hong Kong SAR	03/2016	Live glass eels	63.0	Import (into Hong Kong SAR)	The shipment was carried by two passengers by air from Spain via Turkey , in personal baggage
Hong Kong SAR	03/2016	Live glass eels	91.0	Import (into Hong Kong SAR)	The shipment arrived by air from Spain via the Netherlands , in personal baggage
Hong Kong SAR	11/2016	Live glass eels	14.0	Import (into Hong Kong SAR)	The shipment arrived in cargo from Morocco
Italy	12/2016	Live eels	35.0	Import (into the EU)	Seized at Rome (FCO) airport coming from Egypt, shipment did not have CITES documentation
Hong Kong SAR	12/2016	Live glass eels	76.0	Import (into Hong Kong SAR)	The shipment arrived by air from Spain via the Netherlands , in personal baggage
France	16/01/17	Live glass eels	792	Export (from the EU)	Seized on a road, on way to Roissy airport and then Thailand
France	03/02/17	Live glass eels	200	Export (from the EU)	Seized at Roissy airport, on way to Thailand
France	06/03/17	Live glass eels	200	Internal (EU)	Seized on a road, on way to Spain
Greece/Spain	03/2017	Live glass eels	2000.0	Export (from EU)	An international criminal network dismantled in an operation by Greek and Spanish authorities, supported by Europol and Eurojust: the eels were destined to China , 17 individuals arrested, also seized: data storage devices, documents, luxury cars, EUR 1 million in cash and gold bars
United Kingdom	03/2017	Live glass eels	200.0	Export (from EU)	The eels originated from Spain and were in transit to Hong Kong SAR by air
China	03/2017	Live glass eels	88.0	Import (into China)	The shipment arrived from Turkey

Country of seizure	Date	Commodity	Quantity, kg ⁴	Direction of trade	Seizure/Route details
Hong Kong SAR	03/2017	Live glass eels	24.9	Import (into Hong Kong SAR)	The shipment arrived from Morocco via Qatar
Hong Kong SAR	03/2017	Live glass eels	14.8	Import (into Hong Kong SAR)	The shipment arrived from Portugal via Turkey
Hong Kong SAR	03/2017	Live glass eels	25.4	Import (into Hong Kong SAR)	The shipment arrived from Morocco via the UAE
Hong Kong SAR	03/2017	Live glass eels	14.3	Import (into Hong Kong SAR)	The shipment arrived from Spain via France and China
Netherlands	04/2017	Live glass eels	72.0	Export (from EU)	The shipment was found in personal baggage at an airport in transit from Portugal to China
China	04/2017	Live glass eels	NA (68 bags)	Import (into China)	Shanghai Customs seized the shipment from three passengers. No further information available
China	04/2017	Live glass eels	200.0	Import (into China)	The flight arrived from the Netherlands and the eels are suspected to originate from Portugal . Intercepted in Hangzhou