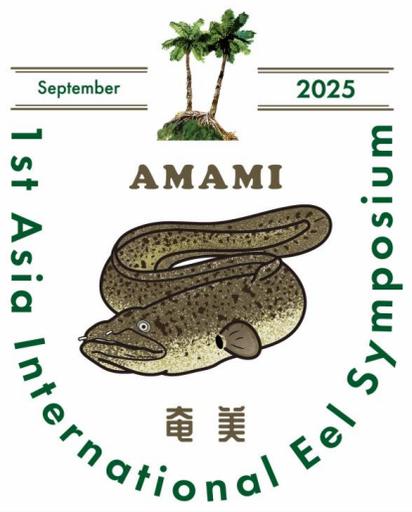


Technische
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Assessing the implication of a CITES Appendix II listing for all *Anguilla* eels

Florian Stein

1st Asian International Eel Symposium, Amami 2025
Session 5: Trade, Management, and Conservation Policies
13 September 2025



based on:
Stein et al. (2025) in ORYX Journal
Stein et al. (*in press*)

Stein FM, Nijman V, Lau MCW, Dekker W

Proposal history

October 2024

- EU: letters to *Anguilla* range countries, asking them about their opinion for two ideas:
 - to move *Anguilla anguilla* to Appendix I
 - to list all *Anguilla* spp. in Appendix II

February 2025

- Concerns about potential impacts were raised in scientific literature and CITES Standing Committee

July 2025

- Proposal for *A rostrata* and *A japonica* + *Anguilla* genus listing

Proposal (CoP20 Pro. 35*)

to include *Anguilla japonica* and *Anguilla rostrata* in CITES Appendix II, in accordance with Article II, Paragraph 2 (a) of the Convention and Criterion B of Annex 2a, and to include **all non-CITES** species of the **genus *Anguilla*** in **CITES Appendix II** in accordance with Article II, Paragraph 2 (b) of the Convention and satisfying Criterion A of Annex 2b of Resolution Conf. 9.24 (Rev. CoP17) for reasons of similarity to *A. anguilla*, or to one of the proposed species (*Anguilla japonica* and *Anguilla rostrata*) in live/processed form.

* <https://cites.org/sites/default/files/documents/COP/20/prop/E-CoP20-Prop-35.pdf>; submitted by the EU, Honduras and Panama

Public positions*

Who?	Criterion B Annex 2a „trade reg. required“ American, Japanese	Criterion A Annex 2b „look-alike“ <i>Anguilla</i> genus	Conclusion
6 CITES parties	Not specified	Not specified	No support
European Union	met	met	support
10 non-EU countries	Not specified	Not specified	support
FAO	Not met	Not met	-
CITES Secretariat	Not met	met	-

* <https://cites.org/sites/default/files/documents/COP/20/prop/E-CoP20-Prop-35.pdf>

Additional info on opposition in media

“There is a sufficient population, and it faces no extinction risk due to international trade”

“We have repeatedly explained our position to the EU and urged them to withdraw the proposal, and we are extremely disappointed by the EU's recent decision”

Minister Koizumi, 27 June, Japan Times*

Additional info on opposition in media

- **Highlights the economic importance of eel aquaculture***
- **Mentions the reservation clause of Article 23 of CITES***
 - allows a Party to formally declare that it will not be bound by specific new or amended listings of species in the CITES Appendices

Examples for reservations in effect:**

- Different whales and dolphins (e.g., Japan, Norway, Iceland)
- Hawks and Eagles (Saudi Arabia)
- Giraffes (e.g., Botswana, Congo, South Africa, Zambia, Zimbabwe)
- Wolves (North Macedonia)
- White-footed fox (most European countries incl. Germany)

* <http://www.fisheco.com/news/articleView.html?idxno=90287>

** <https://cites.org/eng/app/reserve.php>

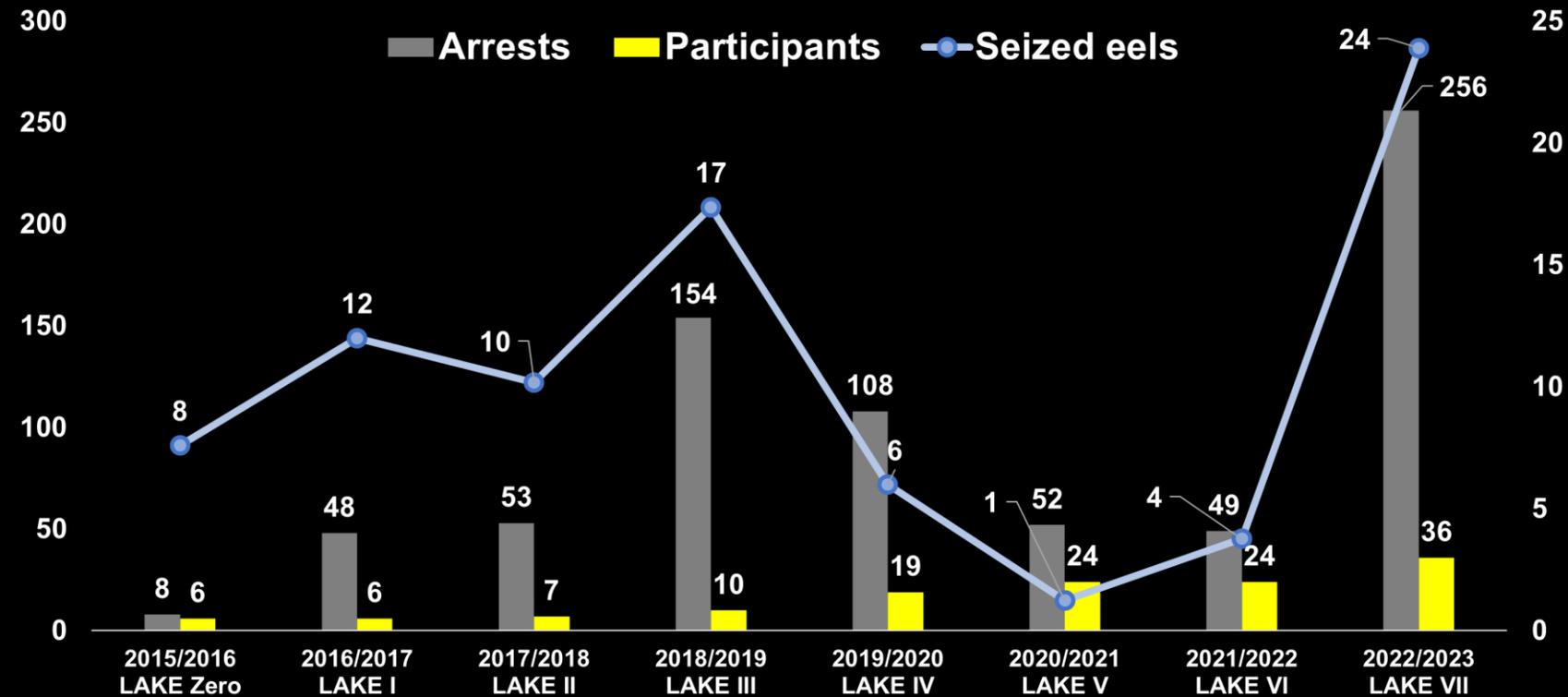
Potential knock-on effects

- **Listing of European eel: massive trafficking**
 - EU prioritised Wildlife Crime, invested heavily into Operation LAKE (Europol, 10 years, ongoing)
- **Implementation of listing**
 - Who is going to fund training/enforcement in regions with less/no capacities?
 - How can we (scientists, CITES community) ensure that NDF assessments are carried out properly?
- **Shift of exploitation/aquaculture to other regions**
 - low ability to manage effectively

Stein et al (2024) *Trends in Organized Crime*

Europe's biggest wildlife crime: Eight years of coordinated actions against eel trafficking

- 8 years, ongoing OP
- 728 arrests
- 82 million eels seized
- €3 billion / year



Potential Benefits

- **Improve visibility/traceability of the global eel trade**
 - Mandatory reporting to national authorities & CITES trade database
- **Ease enforcement**
 - genus level genetic evidence is sufficient
 - complicate/prohibit CITES documentation fraud
 - Empower national control (e.g., trade from Caribbean via US and CA)
- **Catalyst for gradual improvement**
 - No capacities for proper NDF - but starting point!

Conclusion

- Most documented *Anguilla* stocks have declined (human impacts)
- Important, that trade flows are known, controlled and managed
- The value of effectively protecting all *Anguilla* species worldwide may outweigh the potentially smaller value for single species
- Room for greater socio-economic sensitivity toward major user countries
- More proactive consideration of potential knock-on effects

Acknowledgements



European Anglers Alliance



German Anglers Association

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