

Director-General Ms Charlina Vitcheva,  
D.G. for Maritime Affairs and Fisheries  
European Commission  
Rue de la Loi 200  
B-1049 Brussels  
Belgium

Sent by e mail to: [Charlina.VITCHEVA@ec.europa.eu](mailto:Charlina.VITCHEVA@ec.europa.eu); [mare-ac@ec.europa.eu](mailto:mare-ac@ec.europa.eu)  
cc: BALTFISH Member States, ICES

Ref: BSAC/2023-2024/24

Copenhagen, Friday 6<sup>th</sup> October 2023

**Subject: Eel and Joint Special Group 6<sup>th</sup> October 2023**

Dear Ms. Vitcheva,

Thank you very much for inviting the Baltic Sea Advisory Council to the first meeting of the Joint Special Group on 6<sup>th</sup> October 2023. The BSAC will be represented by the chair of the Executive Committee, Jarek Zielinski and the chair of the Ecosystem Based Management Working Group, Nils Höglund and the BSAC Executive Secretary, Guillaume Carruel. In addition, the meeting will also be followed by representatives of two member organisations.

The BSAC acknowledges the fact that, as announced in the Marine Action Plan, the Joint Special Group is to support the implementation of the Plan and monitor its progress. The objective of this special group is to facilitate knowledge sharing and discussions between fisheries and environmental communities, as well as to give the Member States a platform for transparency and dialogue on the implementation of their roadmaps.

Taking account of the fact that the Joint Special Group is to ensure synergies between the implementation of the CFP and environmental regulations, **the BSAC wants to highlight that European eel is a great example of topic that should be on the work programme of the Group.** It is an important file to be discussed by both fisheries and environmental ministries and stakeholders.

The conservation and management of eel is a wide-ranging issue which goes far beyond fisheries and needs to consider fisheries, environmental factors and other human activities affecting the eel stock. The Joint Special Group should also be a platform to discuss the Eel Regulation with all stakeholders including those whose activities have an impact on the stock, e.g., water management, stream barriers, hydropower generation, etc.

Furthermore, to promote transparency in the progress made by Member States on the topic, and facilitate further engagement for stakeholders, **the BSAC recommends that the Commission publicly share the draft update of the Eel Management Plan guidance document.**

The BSAC will continue to engage with the Member States in the framework of BALTFISH to promote coordination around the implementation of the national eel management plans, including actions to protect the eel throughout its lifecycle, as well as efforts made and put into place to address non-fisheries-related sources of mortality, implementation of a catch documentation system, measures against IUU fishing and an EU ban on exports outside the EU.

In this endeavour, **the BSAC recommends that the Commission also enquires on how the agreement on Biodiversity Beyond National Jurisdiction or “High Seas Treaty”, recently signed by the EU, could help protecting eels throughout their life cycle, including during their spawning migration to and reproduction in the Sargasso Sea.**

We thank the Commission for its availability at the BSAC Ecosystem Based Management Working Group on the 27<sup>th</sup> September and look forward to continue working with the Commission on improving the eel management

Kind regards,



Nils Höglund  
BSAC EBM Working Group Chair



Jarek Zieliński  
BSAC Executive Committee Chair