



New England Govt. Ministers:

The Rt Hon Daniel Zeichner MP
Minister for Food Security and Rural Affairs
daniel@danielzeichner.co.uk

andrewkerrseg@gmail.com

The Rt Hon Douglas Alexander MP
Minister of State for Trade Policy and
Economic Security
dbtcorrespondence@businessandtrade.gov.uk

8 August 2024

Stephen Doughty MP
Minister of State (Europe, North America and
Overseas Territories)
FCDO.correspondence@fcdo.gov.uk

The Rt Hon Dame Diana Johnson DBE MP
Minister of State (Minister for Policing, Fire and
Crime Prevention)
HomeOfficePolicyMP@homeoffice.gov.uk

By-e-mail

Dear Ministers,

Trade of Eels to Russia

The [Sustainable Eel Group](#) is the leading NGO in Europe solely dedicated to the recovery of ecologically and commercially important European eel, which declined between 1980 and 2010 such that it is currently classified as 'critically endangered'. Trafficking of eels from Europe has contributed to their decline and has generated some £3 billion annually in illegal downstream revenues. In past years it has been the most trafficked animal in Europe, by number and value.

The trade of eels is also governed by CITES. After Brexit, eels could no longer be traded between the UK and the EU, so UK traders sought opportunities to trade with non-EU 'range states' (countries where the European eel lives, but are also not in the EU), such as Morocco and Russia. This is a move that we support in principle - we support the responsible trade of this species, and have developed a [standard](#) to identify and certify those who are doing so. This voluntary standard now covers 80% of the glass eel sector in Europe, from fishing to trading, eel farming, restocking and processing.

Following the Russian invasion of Ukraine there have been several applications for trade of eels from the UK to Russia, some of which were [approved](#) under the previous administration.

As the new Government, we ask you to review the permitting of this trade for the following reasons:

1. Whilst not on the list of sanctioned products to Russia, we believe that any trade with this state supports the Russian regime financially and reputationally;
2. The trade, which is supposedly for re-stocking for conservation purposes is, judging by a Russian [media report](#) actually to support a commercial fishery. This means that the trade is not solely for its intended purpose and cannot therefore be considered wise. As the Russian and Kaliningrad Eel Management Plan has not been approved by ICES, it does not yet

meet the Eel Regulation. It is difficult to understand how the UK CITES Authorities could have made a 'non-detriment finding' in order to meet the CITES permitting criteria;

3. The trade is via Kaliningrad, a known hub for trafficking, and therefore with high risk that the highly valuable eels exported will not be used for the intended purpose. Trade of eels is well known for its connection with Trade Based Laundering and the UK Wildlife Crime Unit will be able to brief you;
4. From the SEG perspective, trade to Kaliningrad does not meet the SEG Standard as the key clauses on traceability and transparency are not being met. Similarly, the assurance processes that are part of the total SEG System cannot be independently and credibly verified.

This is a cross-Government issue; hence we have written to all of the relevant departments. We believe that the decision taken by the previous administration, against the advice of some permitting officers, was to help demonstrate that 'Brexit is working'. It is not a responsible trade, done for the benefit of this endangered species. We ask that you do not grant any further eel export licenses to Russia.

Please note that we do not call for an end to the fishery. The UK eel fishery has an important role to play and can be regarded as responsible if well regulated.

It is however, an absurdity that it is no longer possible to trade glass eels from England to Northern Ireland, which is in the UK and where they have been exported for decades, but it is permissible to trade to Russia, a sanctioned state.

We hope you will review this position and will be pleased to offer any information to support that.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'ANKW.', with a period at the end.

Andrew Kerr
Chairman