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[A slippery subject: European eel trafficking in criminology teaching](#)

Richard Hester and Nick Pamment discuss illegal trafficking of the European eel and why this makes an interesting case in criminology teaching.



Richard Hester



Nick Pamment

[Since 2008, European eels \(*Anguilla anguilla*\) have been classified by the International Union for Conservation of Nature as 'Critically Endangered'](#). This was following decades of declining populations and calls for action to protect the European eel, due to a range of threats to the population including trade (both legal and illegal). Albeit a potentially biased viewpoint, the Chairman of the Sustainable Eel Group, Andrew Kerr, [describes the European eel as the world's most trafficked animal "by number and value" and "the greatest wildlife crime on the planet"](#). Perhaps there is some truth to that, as the United Nation Office on Drugs and Crime (UNODC) regard European eel trafficking as a serious problem, devoting an entire chapter on the species in their [World Wildlife Crime Report](#).

Given the concerns over the environmental impact of trade on the species, [the European eel was listed in CITES Appendix II at CoP14 and since 2010, the export of European eels from the EU has been banned](#). This means that European eels can only be legally traded between EU member states, as well as specific countries that have been granted a CITES no detriment status, [such as Morocco and Tunisia](#). The [UNODC reported](#) that this initially led to a decline in eel production from Chinese aquaculture farms, but this promptly recovered to previous levels, emphasising that the multi-billion-pound industry appears to be reliant on European eel trafficking. [Research](#) has shown that, despite no officially reported imports to Hong Kong, European eel is commonly sold in major supermarkets across the region. This highlights how the species has entered mainstream distribution for the average consumer.

Despite the prominence of illegal wildlife trafficking [in interdisciplinary research](#), the plight of the European eel is largely unexplored in criminological inquiry, with environmental science and ecology journals being the main sources. Instead, criminology and social sciences focus on more iconic species with a longer history of trafficking, such as rhino, elephant, tiger, and shark. Even when students in our green criminology or wildlife crime classes are asked to list animals that are subject to illegal trade, nobody ever says eels. A key text for Green Criminology reading lists, the [Routledge International Handbook of Green Criminology](#), makes no reference to the more emerging issue of the illegal eel trade, neither does a more focused text, [The Illegal Wildlife Trade: Inside the World of Poachers, Smugglers and Traders](#). Arguably, there is a lack of awareness about conservation criminology that focuses on European eels.

However, European eels are an attractive proposition for organised criminal groups. [In 2018, €9m worth of illegally trafficked eels were seized, which represents only a tiny fraction of the total amount trafficked](#). The chances of being caught are low, as evidenced by the first (and, to date, only) ever seizure and conviction within the UK of [Gilbert Khoo for trafficking European eels out of the UK in 2020](#). Arguably, this is indicative of the lack of resources dedicated to policing this issue, with wildlife crime not featuring in the [National Crime Agency \(NCA\) Priorities or National Strategic Assessment of Serious and Organised Crime](#). Whilst the [UK National Wildlife Crime Unit lists European eels as a current priority, they are a small team and hampered by “finite resources”](#), an endemic problem with UK wildlife law enforcement. Eel trafficking represents a low risk, high reward area of criminality. Indeed, in the case of Khoo, the Crown Prosecution Service (CPS) issued a self-congratulatory [press release upon securing the conviction](#). However, it is only in the footnotes where it is revealed that Khoo received a two-year suspended prison sentence and unpaid work for trafficking £53m worth of European eels from the UK to Malaysia and Hong Kong. It is fair to question whether this sentence is commensurate with other organised crimes, such as narcotics supply or people trafficking.

Brexit and rule changes have complicated the trading situation of the European eel, as the legal market has become more complex and turbulent. As of 1 January 2021, England, Wales, and Scotland ceased to be part of the EU single market, whilst Northern Ireland retained the EU trading rules. As the UK is no longer an EU member state, this leaves the UK in a curious position of not having a market to which to sell European eels. [This situation will likely lead to an increase in trafficking of European eels from the UK to Asia](#). This assertion should be considered as inevitable, as the evidence shows that the UK has a desirable eel product that cannot be legally sold, and there is an active and lucrative illicit eel market in areas such as Hong Kong, [which is relying on illegally sourced European eel](#). Criminal activity will be happening (if it is not already) in rural areas of England such as Gloucestershire, where organised crime groups seek to ensure that the available product is matched to the illicit market. Whilst major inroads have been made regarding the [breadth](#)

[of criminology and the study of animal harms](#), criminological teaching and research needs to explore this issue so it is not just regarded as an ecological problem. Moreover, law enforcement needs to do more to prevent the trafficking and associated offences from occurring. Students always find European eel trafficking a fascinating case study, and not something that they necessarily think of when choosing to do a criminology degree. Inclusion of European eel trafficking in the criminology curriculum will help to raise awareness about this critical issue.

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