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# A slippery subject: European eel trafficking in criminology teaching

Colloquium on Environmental Futures –  
University of Cape Town – 14 June 2023

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European eel  
(*Anguilla Anguilla*)

Other terms:

- European glass eels
- Glass eels
- Elvers
- Yellow eels
- Silver eels



# Legal status of European eels

- IUCN (2020) have assessed the European eel as 'critically endangered' (for further discussion see Pike et al. 2020)
- CITES listed as an Appendix II animal in 2009 & the EU placed a ban on all European eel imports and exports in 2010 (UNODC, 2020)

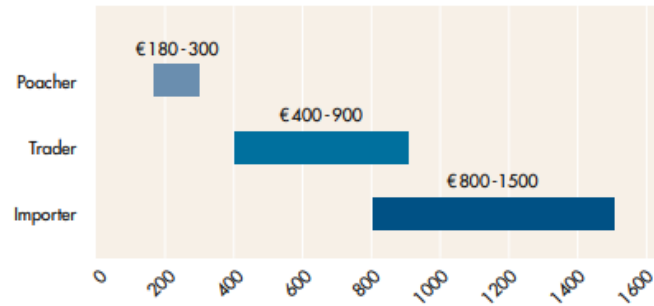


The IUCN Red List of Threatened Species is widely recognized as the most comprehensive, objective global approach for evaluating the conservation status of plant and animal species.

- LC** **LEAST CONCERN**  
At relatively low risk of extinction
- NT** **NEAR THREATENED**  
Likely to become vulnerable in the near future
- VU** **VULNERABLE**  
At high risk of extinction in the wild
- EN** **ENDANGERED**  
At very high risk of extinction in the wild
- CR** **CRITICALLY ENDANGERED**  
At extremely high risk of extinction in the wild
- EW** **EXTINCT IN THE WILD**  
Survives only in captivity
- EX** **EXTINCT**  
No surviving individuals in the wild or in captivity
- DATA DEFICIENT**  
Not enough information available to make an assessment
- NOT EVALUATED**  
No assessment has been made

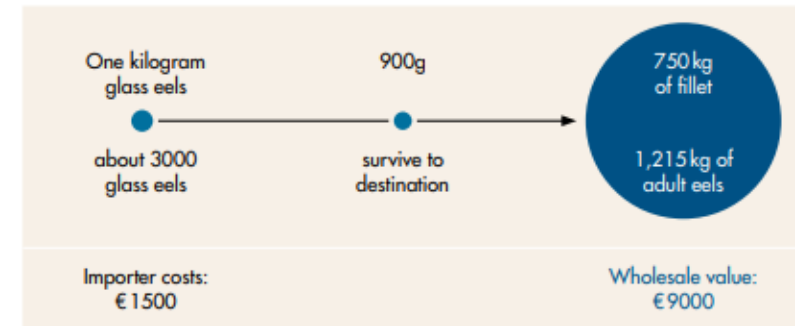
# How lucrative is European eel trafficking?

**Fig. 11** Price per kilogram for illegal eels paid to poachers, traders and importers in 2018 (Euros)



Source: UNODC

**Fig. 16** Transformation of European glass eels to eel filet



Source: UNODC

- In 2019 French customs officers at CDG arrested 2 people bound for China with 91kg of live eels in suitcases – worth over €100,000
- In 2018 it is estimated that €9m worth of illegally trafficked eels were seized, but this represents only a tiny fraction of the amount trafficked
- In 2018 the legal declared amount of live eel imports (all species) was over \$700m
- Wholesale drug price per kilo: cannabis - £4,000; ecstasy - £5,000; cocaine - £28,000; heroin - £25,000 (UNODC)
- (UNODC, 2020)

# Enforcement operations

- Operation Lake – EUROPOL
  - Umbrella term for EU initiative at tackling wildlife trafficking, numerous press releases about seizures and arrests:
  - 2018 – 350kg of live glass eels seized by EUROPOL and 10 arrests by Spanish & Portuguese authorities. Estimated that €37m earned by traffickers
  - EUROPOL reported that 5 tonnes of glass eels seized during 2019 across Europe and 38 arrests
  - 2022- Seizure of €2m worth of European eel across Europe, 49 arrests
- UK enforcement is more limited with few seizure, arrests or convictions (see Guardian, 2020)
- This was the first conviction of its kind in the UK
- What sentence do you think was given to Gilbert Khoo?
- See - CPS (2020) update

## Man found guilty of smuggling £50m worth of live eels out of UK

Gilbert Khoo transported endangered 'glass eels' to Hong Kong hidden beneath other fish



▲ Eels from one of the boxes seized. Photograph: NCA/PA

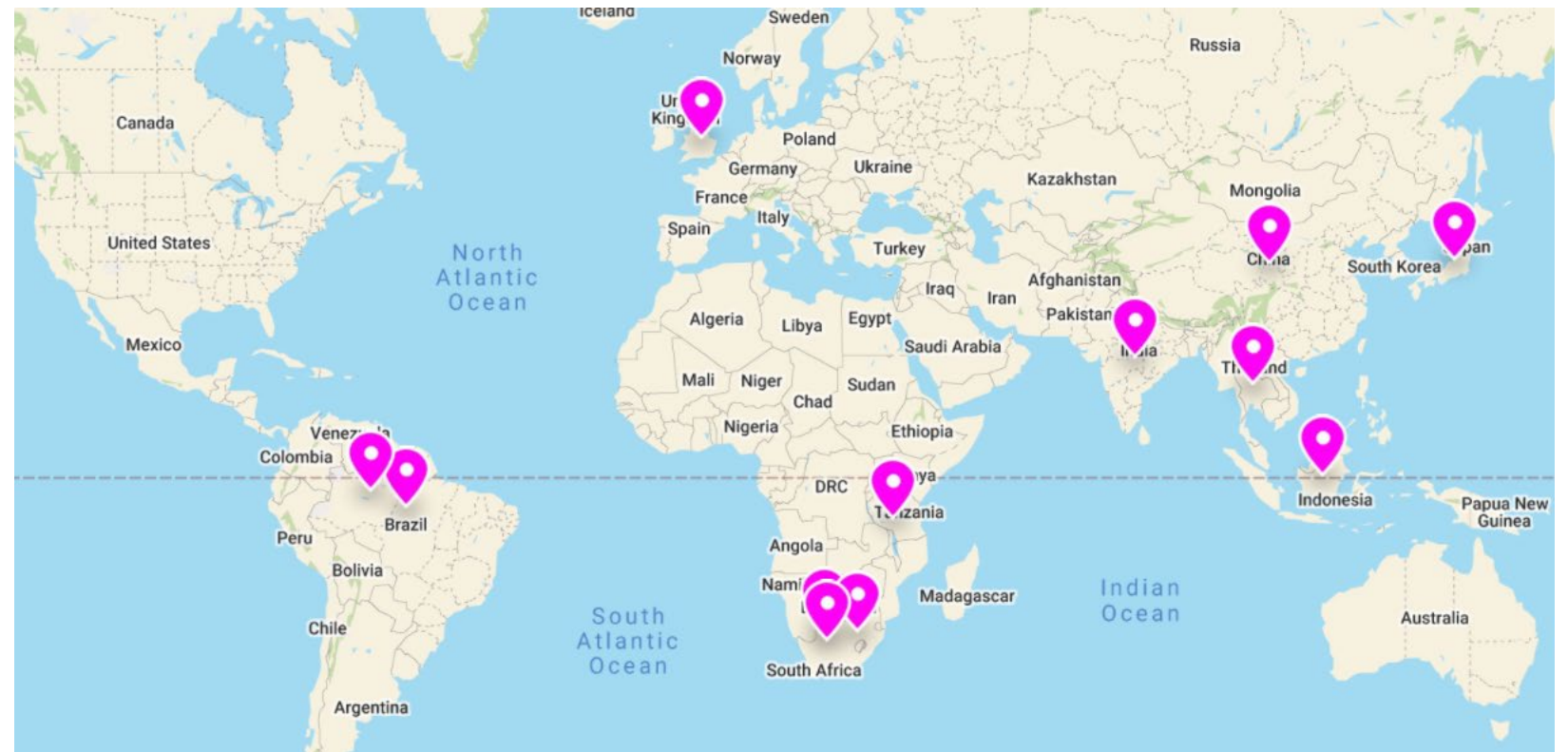
A seafood salesman has been found guilty of smuggling more than £53m worth of endangered live eels out of the UK.

## Eels and Brexit (yes, it is actually a thing!)

- A 'no detriment' status has not been granted for the UK – therefore they cannot trade European eels within the EU
- This has left England, Wales and Scotland with a product, but no market to sell this to (legally)
- Fisheries businesses have raised this with Government
- Northern Ireland businesses cannot trade their eels with the rest of the UK
- Stein & Nijman (2021) state that this will lead to an increase in illegal trafficking

I asked  
previous  
students on  
my module to  
name an  
animal you  
associate with  
trafficking...

- Tigers, Elephants, Donkeys, Turtles, Tuna, Birds of Prey, Pangolins, Parrots, Rhinos, Pythons, Primates, Giraffes...



# Why did nobody say eels?

- Conservation criminology that focuses on European eels is arguably less fashionable (Hester & Pamment, 2022). Criminologists focus on animals which have:
  - a perceived greater standing and status (Abell, 2013) or
  - that appear more attractive and worthy of preservation (Gunnthorsdottir, 2001).



## Summary –

# Wildlife crime case study – European eels

- European eels are a protected (CITES Appendix II), critically endangered species that cannot be traded outside of the EU
- They cannot be bred in captivity, so live glass eels are a valuable commodity for aquaculture
- Legally caught eels are illegally exported to China for use in aquaculture – this process begins at source in places such as the River Severn
- Once farmed in China, the meat is typically exported to Japan (legally)
- The supply chain is complex, diversion is a common tactic
- The wholesale value of European eels is comparable to illegal narcotics
- Enforcement is limited across Europe, convictions are rare and sentences lenient compared to drug trafficking

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