Sveriges lantbruksuniversitet
Swedish University of Agricultural Sciences

YTTRANDE

SLU ID: SLU.ua.2025.1.4-2273

2025-08-22

havochvatten@havochvatten.se

Yttrande över remiss från Havs- och vattenmyndigheten gällande förslag till reviderad nationell förvaltningsplan för ål

Pretext

SLU have been involved in the development of the revised eel management plan by providing HaV with scientific advice and analyses, some of which are presented in the remiss' attachments. We have also assisted HaV by providing supplementary information and interpretation of FORMAS's report on the Swedish eel management, published earlier this year.

Here, in the reply to the remiss, SLU has highlighted what SLU consider the most important consequences of the revised plan for European eel in Sweden as well as potential consequences for SLU's work with European eel.

General comments

Impact on the European eel

Having taken an active part in the process of designing the revised eel management plan, most of SLU's concerns with the previous plan[1] have already been addressed with this revised plan. SLU think the contents of the revised plan are a clear improvement and have no significant issues with it as it stands today. SLU consider the following to be key improvements to the plan:

1. The usage of anthropogenic mortality rates as a management target instead of absolute escapement numbers should help setting more clear and achievable goals, especially in the short term, hopefully leading to actions being taken at a faster pace to improve conditions for European eel in Sweden.

[1] van Gemert, R. (2022) Recommended updates to the Swedish Eel Management Plan. SLU ID: SLU.aqua.2022.5.1-387

2. The previous plan only had management targets for the entirety of Sweden. Even though the long-term biomass recovery target of the updated plan still applies to the entirety of Sweden, there are now also mortality targets on a smaller geographical scale, namely individual river catchment areas. This ensures a more even spread of management measures across the entire distribution range of the European eel in Sweden. Given the many uncertainties around the life cycle of the European eel, this also better spreads risk, in the sense that the consequences of a wrong estimate or an ineffective management measure remain restricted to a single river catchment area.
3. There is now a more concrete plan and time schedule for management actions. Furthermore, there is also a clearer mechanism for periodically reviewing and updating the management plan, better ensuring that the management plan is updated as new knowledge becomes available.

Impact of the revised eel management plan for SLU's work with research and monitoring of European eel

Role of the tri-annual assessment

Within the updated eel management plan, SLU Aquas tri-annual assessment is taking a more central role. The assessment now also takes on the role of an attachment to the eel management plan and will be part of the process of revising the plan and its measures in their 3- and 6-year cycles of revision. This tighter connection between assessment and planning should hopefully improve the frequency at which the management plan gets updated as new data and knowledge becomes available and should be beneficial for the management of eel in Sweden.

As mentioned above the smaller spatial scales for mortality targets as a key improvement to the management plan. However, it should be kept in mind that there is more relative uncertainty in estimates for single river catchment areas than for Sweden as a whole (in the sense that uncertainties at the smaller scale will "even out" when summed for the whole of Sweden). In the future, SLU plan to reduce this uncertainty by, when possible, using more river basin specific estimates of e.g. growth and silvering instead of country averages. Furthermore, SLU plan to better highlight the uncertainties of reported estimates. However, it is possible that for multiple data-poor river catchment areas most estimates will be the result of interpolations of data from other areas, and that there will be significant uncertainty in the estimates of those single catchment areas.

New data

The updated management plan also includes measures to gather more data on various factors relevant to European eel in Sweden, such as presence of eel along the coast (action #14), silver eel escapement from the Baltic Sea (action #15), and impacts of predators such as seal and cormorants (#13). Such data will greatly increase the quality of our assessment of the eel population in Sweden.

Potential disruptions to data streams

Today's eel assessment system relies on indices of immigrating elvers, collected from eel traps. If these traps disappear due to removed barriers or improved fishways, we might need new methods of assessing the numbers of recruits. One solution could be to add this as an action to ensure continued time-series of eel immigration.

Workload

While most of SLU's work continues as before, the management and integration of new data into the eel assessment system will likely require a significant amount of work. Work on the eel assessment is funded by HaV, and this funding needs to be maintained (if not expanded) in order to successfully continue this work.

HaV's use and interpretation of scientific information

We think that current scientific knowledge on European eel, as well as SLU's scientific deliveries to HaV, have been adequately interpreted and used in the design of this plan.

The latest scientific advice on European eel from ICES is that all anthropogenic impacts on European eel should be zero (0%). The revised plan deviates somewhat from this advice as the long-term goal for lifetime anthropogenic mortality is set to 25%. Still, this long-term goal is a significant improvement over the current lifetime anthropogenic mortality of eel in Swedish waters, which is estimated at around 70%.

Specific comments

Regarding impacts of predators on the eel population.

There is an issue with the phrasing used in section 7.3 (Förstå och hantera andra påverkansfaktorer), where the current text reads as if the effects of predators such as cormorants and seals are not currently included in the Swedish eel assessment. This is not the case; natural mortality, which includes predation, is included in our assessment model and is estimated to kill a significant amount of eel. However, the rate of natural mortality is currently based on a rough estimate, and is invariant to location and time, and therefore does not capture variation in mortality due to variation in predation from e.g. cormorants or seals. SLU do, however, fully agree on the necessity of this action and think it could help with producing more accurate estimates for the eel population in Sweden.

Specifically, SLU would suggest something along these sentence changes:

Bilaga 2, sida 26: Change:
"Förbättrade beståndsuppskattningar, där dödlighet från predation ingår"
to:
*"Förbättrade beståndsuppskattningar, där **variation i** dödlighet från predation ingår"*

Remissen, sida 32: Change:
"På grund av denna kunskapsbrist ingår inte dessa övriga påverkansfaktorer i modellerna för bedömning av beståndet av ål."
to:
*"På grund av denna kunskapsbrist ingår inte **variation i** dessa övriga påverkansfaktorer i modellerna för bedömning av beståndet av ål.""*

Beslut om detta yttrande har på rektors uppdrag fattats av dekan Noél Holmgren efter föredragning av koordinator Linda Ferngren. Innehållet har utarbetats av forskarna Eirik Ryvoll Åsheim, Rob van Gemert och Josefin Sundin samtliga vid institutionen för akvatiska resurser.

Noél Holmgren

Linda Ferngren