

# Fishprotection contra Cormorant

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see

distribution list

24. January 2026

## **EU-wide Management Plan for the Great Cormorant (CMP): The Initiative of the EIFAAC**

### **Ref.:**

1. Your Open Letter to the European Commission 02/07/2025 <sup>1</sup>
2. Letter Européche to European Commission 17/10/2025 (s. annex 1)

Dear Members of the European Parliament,

our association, the Fishprotection contra Cormorant reg. association is existing only to achieve the overdue efficient protection of diverse fish stocks and aquatic ecosystems against cormorant predation.

We refer to your activities aimed at stopping the severe and diverse cormorant predation damage through Europe-wide, prompt, and effective cormorant management, most recently with your Open Letter of 2 July 2025 to the President of the European Commission, Mrs von der Leyen<sup>1</sup>. We also refer in particular to the letter from Européche, the representative body of the fishing sector in the European Union, to Mrs von der Leyen dated 17 October 2025, which you are certainly aware of, but which is also attached here (annex 1).

Please allow us to briefly recall the following:

In its judgments, most recently in Case C-784/23, the Court of Justice regularly requires a favourable conservation status of a species as a precondition for interventions. This favourable conservation status was already established for the cormorant in 1998 (Official Journal No. C021 of 22 January 1998, p. 0076, and Official Journal No. C134 of 30 April 1998, p. 0075).

The resolutions of the European Parliament of 4 December 2008 on the adoption of a European cormorant management plan, as well as the Parliament's resolutions of 12 June 2018 and 4 October 2022 on promoting sustainable and competitive aquaculture in the EU, are simply being ignored by the Commission. The undersigned must regard this irresponsible conduct of DG Environment towards aquatic ecosystems as a humiliation of your Parliament, especially since the extraordinary severity of the various environmental damages resulting from the Commission's failure to act is documented today.

...

The fact that Commissioner Jessica Roswall, at the Council meeting on 23 September 2025, intends to develop non-binding guidelines instead of the previous guidance document from 2013 does not improve the situation. Such documents have no effect on regional authorities and policymakers, who largely give priority to bird protection. Only a legally binding EU regulation can prevent this ongoing destruction of aquatic ecosystems inland and along Europe's coasts.

To dispel any doubts: the species concerned is the bird subspecies *Phalacrocorax carbo sinensis* (Staunton, GL, 1796).

The Cormorant Management Plan (CMP) of EIFAAC<sup>2</sup>, which is known to you, is based on solid scientific research, describes the various areas of damage and, with its list of expert reports and publications, once again demonstrates the causal links between damage and cormorant predation. Any attempt to continue denying or downplaying this is completely unacceptable and irresponsible.

**With the additions from the referenced Europêche letter - which are indeed extremely important - this CMP is a solid basis for finally implementing, promptly and effectively, the demands your Parliament has already clearly expressed in several resolutions: "...calls on the Commission to work together with the Member States to take measures to drastically reduce cormorant populations by all means..." (2018).**

In our view, it is the best document produced to date to finally find the long overdue solution for drastically reducing the diverse and severe cormorant predation damages.

**Of decisive importance for achieving an effective solution is that ideologically driven actors within some NGOs, but above all within responsible bodies of the European Commission itself, must be stopped!** This is the key to the long overdue breakthrough. Until now, this has never been addressed critically and energetically. These forces have for many years contributed to the now often dramatic situation with their inappropriate, unrealistic behaviour, which frequently ignores scientific findings. They show a clear lack of responsibility for aquatic ecosystems, for water quality, for food sovereignty and food security, for jobs (including already dismantled fishing fleets), and for socio-economic aspects. The published feedback tables on the CMP drafts<sup>3</sup> alone demonstrate the intentions of these actors.

Please recall the annexed Europêche letter and let it convince you. Please work vigorously to ensure that decisions are taken strictly on a scientific basis, but at the same time pragmatically, purposefully, and without delay.

Unfortunately, the EIFAAC CMP will not advance on its own:

- NGO representatives, led by Wetlands International, called on the European Commission in August to halt the CMP initiative, as you will know. We shall refrain from commenting on their arguments here; apart from formal claims (such as EIFAAC is not authorized), it should suffice to refer to our remarks above regarding irresponsible and evidently ideological behaviour.
- As far as we are aware, there are in the meantime other initiatives (see annex 2), including some from DG ENV of the European Commission, dealing with the cormorant-fish conflict, yet they apparently ignore the well-founded EIFAAC document and thus the enormous scale of

- damage. We do not know the details, but consider these “alternative” approaches questionable and in some cases pointless if they are not aligned with the CMP. These initiatives must either be developed on the basis of the CMP or be put on hold. Premature, half-baked, isolated solutions must not be allowed to enter the overall process.

**Dear Members of Parliament, please advocate strongly and demand that the European Commission take up this EIFAAC Cormorant Management Plan and implement it on a scientific basis, as described in the Europêche letter (Reference 2). Ideological objectives and ideological actions must no longer be tolerated; they must be rigorously prevented.**

This is the key to the long overdue breakthrough. If necessary, the President of the Commission, Mrs von der Leyen, must intervene personally.

The extent of cormorant damage, including economic damage, is enormous, and it is irresponsible not to respond decisively. In times of increasingly limited public budgets and additional challenges, policy must be strictly reality-based, efficient, and resource-conserving.

The other ongoing activities in Europe aimed at finding a comprehensive solution to the cormorant-fish conflict must, as stated, be based on the CMP; otherwise, they must be postponed or stopped. This applies especially to any potential update or even revision of the Guidance on the general system of protection of bird species under Articles 5 and 9 of the Birds Directive (2009/147/EC).

Dear Members of Parliament, take the initiative promptly and, on the basis of the EIFAAC CMP work, as described by Europêche in Reference 2 (see Annex 1), prevail the long overdue protection of fish stocks also as key success factor for the recovery of aquatic ecosystems.

Dear Members of Parliament, the overall situation virtually compels consideration of the possibility that your Parliament might take legal action against the Commission on the grounds of omission, in view of the extraordinary severity of the environmental damage. Please give this serious consideration.

Kind regards

Karl Friedrich Kämper  
*President*

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*Ref 1 : Open letter by European Parliament Members to the European Commission 02/07/2025 in support of the European cormorant management plan*  
URL: [https://www.fao.org/fishery/services/storage/fs/fishery/documents/EIFAAC/OpenLetter\\_EUCormorant\\_ManagementPlan.pdf](https://www.fao.org/fishery/services/storage/fs/fishery/documents/EIFAAC/OpenLetter_EUCormorant_ManagementPlan.pdf)

*Ref 2 : FAO/EIFAAC (2025). "Framework for a European Management Plan for the Great Cormorant. Version July 2025"*  
URL: [https://contra-kormoran.de/wp-content/uploads/2026/01/EIFAAC\\_CMP\\_Version\\_2025Jul.pdf](https://contra-kormoran.de/wp-content/uploads/2026/01/EIFAAC_CMP_Version_2025Jul.pdf)

*Ref 3 : FAO/EIFAAC (2025). "Feedback table of comments received on EIFAAC/2025/2"*  
URL: <https://openknowledge.fao.org/bitstreams/bf96c0b5-9cbb-49d6-b846-68c10bcb3ac/download>

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**Ursula von der Leyen**  
President of the European Commission  
Rue de la Loi / Wetstraat 200  
1049 Brussels  
Belgium

Brussels, 17 October 2025

**Subject: Call for urgent EU action on cormorant management to address severe ecological and economic damage**

Dear Mrs. von der Leyen,

On behalf of Europêche, the representative body of the fishing sector in the European Union, we wish to draw your personal attention to the urgent need for a coordinated and effective EU-level management of the cormorant population (*Phalacrocorax carbo sinensis*). This would be imperative to do in view of the diverse and immense damage caused to fish stocks by the European population of cormorants (*Phalacrocorax carbo sinensis*).

A draft European Cormorant Management Plan (CMP) has been presented by EIFAAC (European Inland Fisheries and Aquaculture Advisory Commission) of the Food and Agriculture Organization of the United Nations. This document, which is based on solid scientific research, describes the various areas of damage and, with a reference list of expert reports and publications, once again demonstrates the causal links between damage and cormorant predation. However, despite the relevant submissions provided by stakeholders, the draft still fails to adequately account for a critical economic dimension — the substantial indirect costs associated with cormorant predation.

It has been documented for German rivers, that cormorant predation has caused major decline in the slow-growing native fish species that graze on algae or stir up the substrate/bottom. As a result, despite all efforts and financial expenditure, the good ecological status of the waters is not achieved and the objectives of the European Water Framework Directive (WFD) are not met. The damage is estimated to be in the double-digit billions (67) for Germany alone, and across Europe it is likely to be in the triple-digit billions: a side effect of the cormorant with immense financial significance.

It is a fact that there is high consensus in fish/fisheries science today about the significant, often existential impact of cormorants on freshwater fish fauna (biodiversity), water quality, and fishing. For the shallow, coastal saltwater areas of the North Sea and Baltic Sea, the existing data at least gives rise to strong suspicion; we also consider this to be sufficiently proven<sup>2</sup>. Any attempt to continue to question all of this is unacceptable and irresponsible.

In an open letter<sup>3</sup> dated July 2, 2025, ten members of the European Parliament addressed you and, with regard to the CMP, called on your Commission “to bring forward without further delay a concrete and coordinated EU-level management solution.” The letter emphatically recalled that the European

Parliament had already repeatedly (in 2008, 2013, and 2022) urged your House to establish cormorant management, but that no action had been taken. Our association contacted the authors (see Annex 1). We pointed out to these parliamentarians the enormous indirect negative effect of cormorant predation on the WFD mentioned above and emphasized that effective fish protection measures must be put in place via a “fast-track” implementation, starting immediately, for example with “no-cormorant-zones.”

In our accompanying letter, an important premise of the CMP authors was also critically addressed: *‘Furthermore, it is important to work together to reduce cormorant predation pressure on the fish stocks and achieve the balanced outcomes to ensure all parties are working in harmony.’* For decades it is obvious, that the bird conservation groups tend to deny/downplay the dramatic and diverse impact of cormorant predation all over Europe and the overwhelming stack of scientific documents. For years, these groups have, in our opinion, neglected both the true goals of biodiversity conservation and the needs of a society committed to sustainable food production and the preservation of jobs.

It was to be feared, and is indeed evident in the current CMP draft<sup>4</sup>, that attempts were made to relativize, suppress important aspects, and prevent or postpone a quick and effective solution.

The recent letter from Wetlands International to your attention goes far beyond our initial concerns. We are deeply concerned by the continued and strong opposition to a coordinated European approach to cormorant management. In light of the significant and well-documented damage caused, we question the sense of overall responsibility shown by these organisations regarding the protection of aquatic ecosystems. The apparent lack of attention to the deteriorating state of Europe’s freshwater environments is, in our view, both regrettable and difficult to understand.

We are convinced that time is running out and **action is needed now!**

We respectfully urge your personal involvement in making the cormorant issue a top political priority and ensuring the successful adoption and implementation of the European Cormorant Management Plan. The current draft provides a solid foundation, but it now requires swift translation into an effective and pragmatic solution. Member States should be encouraged and enabled to implement targeted fish protection measures through formal channels, making full use of the existing legal framework and ensuring its consistent application over the medium term. Discretionary powers must be exercised at all decision-making levels with due regard to the principle of proportionality and the demonstrated severity of the damage in each affected area.

We would also invite you to review the published list of proposed amendments to the first draft of the CMP, which provides valuable insight into the current discussions. Unfortunately, it reveals that, alongside several NGOs, representatives of the Directorate-General for Environment appear closely aligned with positions opposing targeted and effective fish protection measures. This situation is deeply concerning and must be addressed without delay to ensure a balanced, science-based outcome.

To ensure the effectiveness of the process, it is essential to put an end to the systematic and ideologically driven denial of the damage caused and to the obstruction of targeted management measures. Achieving this will require your personal intervention — a clear signal and an appeal to the sense of responsibility of all those involved. We urge you to instruct your services to ensure that work on this matter is conducted in a scientifically robust, transparent, and results-oriented manner, particularly with regard to the implementation of the management plan.

Should the Commission, in the coming years, formally determine that Member States have failed to meet the objectives of the Water Framework Directive (WFD), it would be both inconsistent and unacceptable to demand corrective measures or impose penalties while disregarding the significant impact of cormorant predation and allowing it to persist.

Finally, in addition to the existing clear resolutions of the European Parliament on the cormorant problem, we would like to draw attention to the following relevant developments:

- *Information from Sweden: AOB for the meeting of the Agriculture and Fisheries Council of 23 June 2025*<sup>6</sup>
- *European Council, Agriculture and Fisheries Council, 23 Sep 2025*<sup>7</sup>
- *In Germany a survey of experts on 26 June 2024, in the Environment Committee of the Bundestag based on a motion by the CDU/CSU parliamentary group dated 12 Mar 2024: Cormorant Management - Protection of Biodiversity and Fishery Stocks*<sup>8</sup>

Kind regards



Javier Garat  
President of Europeche

*Copy to:*

*Mr. Raffaele Fitto, Executive Vice-President European Commission*

*Ms. Jessika Roswall, Commissioner for Environment, Water Resilience and a Competitive Circular Economy*

*Mr. Costas Kadis, Commissioner for Fisheries and Oceans*

## List of obviously ongoing activities with reference to the cormorant-fish conflict

1. Meeting with member states organized by EU-commission on Oct 28, 2025 (we got no information about the contents/results)

2. Concerns regarding the European Commission's draft guidance on the protection of bird species (Articles 5 and 9 of the Birds Directive)

Von: Delphine Dupeux <[delphine.dupeux@elo.org](mailto:delphine.dupeux@elo.org)>

Datum: 31. Oktober 2025 um 15:51:04 MEZ

An: Delphine Dupeux <[delphine.dupeux@elo.org](mailto:delphine.dupeux@elo.org)>

Betreff: Concerns regarding the European Commission's draft guidance on the protection of bird species (Articles 5 and 9 of the Birds Directive)

*We wish to make you aware that the European Commission is finalising a new Guidance on the general system of protection of bird species under Articles 5 and 9 of the Birds Directive (2009/147/EC). This document (**attached**) is for discussion at the Expert Group on the Birds and Habitats Directives (NADEG) meeting of **25 November 2025**. The European Commission is currently seeking input from Member States with a view to formally adopting the guidance.*

3. AAM\_Expert meeting on "Management of Predator Impacts: Part I on the Great Cormorant"

Betreff: AAM\_Expert meeting on "Management of Predator Impacts: Part I on the Great Cormorant"

Datum: Fri, 5 Dec 2025 10:31:19 +0000

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4. Cormorant Conference 2026 | Cormorant2026" 03-06 Februar 2026 in Prague

*led by "The Cormorant Research Group, the IUCN SSC Cormorant Specialist Group (usually referred to as the Cormorant Research Group 'CRG')". The meeting is "Funded by the European Union"*

[https://cormorant2026.cz/documents/8/Preliminary\\_program\\_Cormorant\\_2026\\_ver120.pdf](https://cormorant2026.cz/documents/8/Preliminary_program_Cormorant_2026_ver120.pdf)