

Fishprotection contra Cormorant

Office: Iltisweg 11, 51503 Roesrath, Germany
www.contra-kormoran.de
info@contra-kormoran.de



see

distribution list

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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 ¹
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 Leyen¹. 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 EIFAAC², 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 drafts³ 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

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

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

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>

Distribution list

Asger Christensen	asger.christensen@europarl.europa.eu
Sofie Eriksson	sofie.eriksson@europarl.europa.eu
Heléne Fritzon	helene.fritzon@europarl.europa.eu
Eero Heinäluoma	eero.heinaluoma@europarl.europa.eu
Niclas Herbst	niclas.herbst@europarl.europa.eu
Gabriel Mato	gabriel.mato@europarl.europa.eu
Jessica Polfjärd	jessica.polfjard@europarl.europa.eu
Bert-Jan Ruissen	bert-jan.ruissen@europarl.europa.eu
Sander Smit	sander.smit@europarl.europa.eu
Flavio Tosi	flavio.tosi@europarl.europa.eu

CC:

Vice-President of European Parliament

Ms. Katarina Barley katarina.barley@europarl.europa.eu

Mr. Tiemo Wölken tiemo.woelken@europarl.europa.eu

EIFAAC-Secretariat EIFAAC-Secretariat@fao.org

EUROPÊCHE, Association of national organisations of fishing enterprises in the EU
europeche@europeche.org

Deutscher Fischereiverband e.V.

info@deutscher-fischerei-verband.de

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>

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

An: Delphine Dupeux <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

Von: Sarah Iturbe Madinabeitia <sarah.iturbemadinabeitia@nttdata.com>

An: Mayra Llorente <maira.maria.llorente.manzanares@nttdata.com>, Tiziana Pacchiarini

<tiziana.pacchiarini@nttdata.com>, Pablo Manuel Xandri Royo <Pablo.Manuel.Xandri.Royo@nttdata.com>

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