

Fishprotection contra Cormorant

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

References:

1. Our Letter 24/01/2026
2. Briefing European Parliamentary Research Service (EPRS): "Impact of cormorant predation on EU fisheries and aquaculture" January 2026 | Document number: PE 782.619 ¹
3. Letter Européche to European Commission 17/10/2025
4. Letter European Commission to Européche 24/02/2026

Dear Ladies and Gentlemen, dear Members of the European Parliament,

Following up on our letter of 24 January 2026 (Ref. 1) and after reviewing the EPRS briefing on the cormorant (Ref. 2), it is essential to address you again and inform you of important matters directly related to the EIFAAC CMP:

1. EPRS briefing

In our view, the EPRS briefing is very well prepared. However, it must additionally clearly describe the immense impact of the cormorant on fish and biodiversity conservation, and the entire aquatic ecosystem:

The European Water Framework Directive, the Habitats Directive, the Regulation on Nature Restoration, and the Green Deal are being completely - 100% - undermined with regard to freshwater fish by cormorant predation. In its reports of February 4, 2025, and in the Environmental Report of July 7, 2025, the Commission left no doubt that 2027 is the final deadline for the implementation of Directive 2000/60/EC.

Instead of 30 to 40 fish species, as indicated by the fish reference conditions, monitoring regularly records fewer than 10.

This becomes evident when comparing the fisheries indicator "fish biomass" in sub-catchment areas. In good ecological status, this value must exceed 300 kg/ha and is not seldom above 600 kg/ha. Today, despite supportive stocking measures, fish biomass is predominantly recorded at below 15 kg/ha. Unforeseeable consequences for the natural reproductive capacity of species must be feared—and are already becoming apparent.

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Attempts to reintroduce migratory fish species in Germany have also largely failed for about 25 years, mainly due to the cormorant problem.

For nearly all fish species, the autochthonous genetic footprint – adapted to the local habitat – has been irreversibly destroyed by these predators.

The final paragraph of the chapter “Impacts on Fisheries and Aquaculture” – “Cormorant Foraging in the River” – downplays reality: It is a fact that in fisheries science today there is broad consensus about the significant, often existential impact of cormorants on freshwater fish fauna (biodiversity), water quality, and fishing. This is very well documented by the CMP with a stack of references, irrefragable.

We are convinced that many fish stocks are at risk of extinction – our primary goal is therefore to secure their recovery and survival.

2. Int. Project ProtectFish² under the Horizon Europe research and innovation programme

The European Commission is funding the project ProtectFish. The leading scientists involved undoubtedly possess a high level of expertise and enjoy our trust. At the launch of ProtectFish, not only our association hoped that it would soon produce a decisive, practically applicable step toward reducing the various predation damages caused by *Phalacrocorax carbo sinensis*.

However, the two conferences held so far — on 6 May 2025 in Koblenz, Germany, and on 3 February 2026³ in Prague as well as the 11th International Conference on Cormorants⁴ organized with the participation of ProtectFish in Prague, demonstrate that this has not at all been the case. The focus is on scientific objectives that do not in any way reflect the dramatic dimension of the predation damage to diverse fish stocks or the urgent need for remedial action as stated actually with the CMP.

Exemplarily, we would like to mention some aspects of ProtectFish:

- A new Europe-wide cormorant census, although the European Commission officially confirmed a favourable conservation status as early as 1998 (Official Journal No. C021 of 22 January 1998, p. 0076, and Official Journal No. C134 of 30 April 1998, p. 0075);

- An, in our view, entirely unnecessary focus on the fish species grayling with several grave consequences: Especially the absence due to predation of fish species grazing algae etc. and their massive impact on the ecological status of waterbodies are not considered at all. The financial dimension of double-digit billions of Euros has been stressed in Ref. 1 and as well by Européche (Ref. 3);

- Very special research objectives such as: “These experiments ... analyse fish behavior under predation pressure and assess the rate and conditions under which fish populations can recover when predation intensity is reduced.” We are convinced that a lot of fish stocks are endangered to be extinguished completely - main objectives thus are to let them revive and survive!!!

In detail, it is evident that the European Commission itself exerts steering influence over ProtectFish and that, once again, consideration had to be given to stakeholders and NGOs known to be extremely ideologically driven (see Ref. 1).

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In summary, all scientific studies on cormorants and cormorant predation are, of course, to be welcomed. However, the objectives and activities of the entire ProtectFish project contribute little to the urgently necessary and timely implementation of an effective Europe-wide Cormorant Management Plan. Waiting for results from ProtectFish is not worthwhile and is, in view of the dramatic situation affecting many fish populations, simply irresponsible.

3. Short Comment on the Response of the European Commission, DG ENV (Ref. 4) to the Europêche letter to Ursula v.d.Leyen (Ref. 3)

While working on this letter, we became aware of the receipt of the response from the European Commission to Europêche. While it is Europêche's responsibility to comment, distribute, and take further action, we would like to take the opportunity of this letter to immediately comment on this specific reply from the Commission:

It is an outrage that the Commission responded to this important letter from Europêche only after four months.

The second sentence of the Commission's letter alone reveals its rigid, irresponsible, inadequate and consequential attitude:

“The Commission fully acknowledges the challenges posed by the increasing populations of Great Cormorant in specific regions, which have led to conflicts with commercial fisheries, aquaculture, and recreational angling.”

In other words, this means that the Commission continues - coldly, ignorantly, and arrogantly - to ignore

- the entire EIFAAC Cormorant Management Plan (CMP) and the concrete additional aspects submitted by Europêche (Ref. 3),
- the documented, diverse, and severe damage caused by cormorant predation to natural fish stocks and aquatic ecosystems across Europe, and
- the financial immense side effect resulting from the failure to achieve the objectives of the Water Framework Directive - likely in the triple-digit billions across Europe due to cormorant predation.

This makes it immediately clear how limited and harmless the measures are that the Commission still intends to take to address cormorant predation pressure. In our view, it is hardly worthwhile to engage with the mitigation measures listed in Ref. 4.

They do not in any way reflect the scale of the damage and the dramatic nature of the situation. All

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of them remain at the level of the measures previously described in the EIFAAC CMP under the Birds Directive and the Guidelines for Derogation, which have evidently and demonstrably failed to produce any significant recovery of fish fauna.

Honourable Members of the European Parliament, please do not allow such ineffective measures to be presented as a solution. They merely serve to delay action and entangle stakeholders in local authorization procedures and subsequent court proceedings, which ultimately prevent any effective fish protection.

The letter was evidently drafted within DG ENV, without even consulting the advocates for fish species protection and aquatic ecology (WFD matters). Once again, it is a prime example of irresponsible conduct by the Commission, a lack of commitment to intact ecosystems and biodiversity, and at the same time to autonomous food security.

Moreover, this ignorance directly results in the Commission itself, in practical terms, violating several European directives and their objectives. The widespread failure to apply the 2013 Cormorant Guidance already demonstrates that the Commission is not fulfilling its responsibility to enforce Union law.

Reference letter 4 is therefore a prime example demonstrating that the President of the Commission must make the cormorant issue a top priority without delay and/or that the courts must require a timely solution.

Let us finally repeat our recommendation from reference 1:

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 (Ref. 3). Ideological objectives and ideological actions must no longer be tolerated; they must be rigorously prevented.

Kind regards

Karl Friedrich Kämper
President



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Ref 1: Briefing European Parliamentary Research Service (EPRS): "Impact of cormorant predation on EU fisheries and aquaculture" January 2026
URL: [https://www.europarl.europa.eu/RegData/etudes/BRIE/2026/782619/EPRS_BRI\(2026\)782619_EN.pdf](https://www.europarl.europa.eu/RegData/etudes/BRIE/2026/782619/EPRS_BRI(2026)782619_EN.pdf)

Ref 2 : ProtectFish, a project funded by the Horizon Europe research and innovation programme
URL: <https://protectfish.eu>

Ref 3: ProtectFish Consortium reviews first 18 months of work in Prague
URL: <https://protectfish.eu/protectfish-consortium-reviews-first-18-months-of-work-and-coorganises-the-11th-international-conference-on-cormorants/>

Ref 4: 11th Int. Conference on Cormorants; 3-6 February 2026 in Prague: Preliminary Program
URL: https://cormorant2026.cz/documents/8/Preliminary_program_Cormorant_2026_ver120.pdf

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