

Wetlands International Europe

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Ms Ursula von der Leyen President European Commission

Ms Teresa Ribera, 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

Brussels, 25 September 2025

Subject: Call on the European Commission to reject the proposed Pan-European Cormorant Management Plan (CMP)

Dear President, Dear Commissioners,

Wetlands International is a globally respected organisation that is a leading authority on the conservation and management of waterbirds. It supports the implementation of the EU Birds Directive, the Agreement on the Conservation of African-Eurasian Migratory Waterbirds (AEWA) and the Ramsar Convention on Wetlands. We are writing to you in this capacity and on behalf of more than 35 other civil society organisations and leading European knowledge institutions to express our strong concern about the management of the Great Cormorant.

The Food and Agriculture Organisation's European Inland Fisheries and Aquaculture Advisory Commission (EIFAAC) has recently submitted a document entitled "Framework for a European Management Plan for the Great Cormorant (Version July 2025)" (hereafter referred to as the CMP) for further review and endorsement by DG MARE and DG ENV. In the meantime, EIFAAC has engaged in political lobbying through members of the Parliament's PECH Committee and Member States' fisheries ministries in the AGRIFISH Council, urging the European institutions to build upon this work at the European level.

The CMP has been developed under a contract awarded to EIFAAC by DG MARE, titled "Developing Europe-wide management advice to protect <u>vulnerable and endangered</u> fish species from unsustainable predation by cormorants" (GCP/RER/069/EC). Despite the scope of the contract, the submitted plan primarily emphasises the protection of marine and inland fisheries and aquaculture,



with limited consideration for the threatened fish species. It proposes establishing a Pan-European cormorant management system, to be coordinated by EIFAAC, an organisation which has no mandate for managing the Great Cormorant.

We generally welcome Commissioner Roswall's response at the recent AGRIFISH Council, including her explanation why listing the species in Annex 2 of the Birds Directive is not an appropriate solution. However, we urge the **categorical rejection of this CMP** as the basis for managing the cormorant-fisheries conflict in the European Union because it is:

- (i) in contradiction with the provisions of the EU Birds Directive (2009/147/EC),
- (ii) incompatible with the provisions of the Agreement on the Conservation of African-Eurasian Migratory Waterbirds (AEWA) concerning the development of international species management plans, and
- (iii) a biased outcome of an inherently flawed development process.

We have already provided more detailed arguments to the respective Heads of Unit (Mr. Felix Leinemann at DG MARE, and Mr. Andrea Vettori at DG ENV). In a separate letter, we also request the General Director of the FAO to retract this document due to its poor scientific quality and inconsistency with FAO's own guidelines.

We welcome the European Commission's intention, expressed at the AGRIFISH Council, to engage in a more inclusive consultation with Member States and other stakeholders regarding the optimal use of available tools at the national level to help resolve this conflict, and we offer our support in such a process. In so doing we respectfully urge the European Commission to uphold its position presented to the European Parliament by former Commissioners Vella in 2016 and Sinkevecius in 2021, stating that Member States possess all the necessary tools under the Birds Directive, the European Maritime and Fisheries Fund (EMFF) and the European Maritime, Fisheries and Aquaculture Fund (EMFAF) to address conflicts related to the Great Cormorant.

We would be grateful to receive your response on this matter, as it will also allow us to take further actions as necessary.

Your sincerely,

Or Chris Baker
Director

The following organisations support this letter:

LPO - Birdlife France (LPO), Cédric Marteau - General manager, France DOPPS - BirdLife Slovenia (DOPPS), Luka Božič - Conservation ornithologist, Slovenia natur&ëmwelt a.s.b.l., Claudine Felten – Director, Luxembourg SEO/BirdLife, Spain

Society for Bird and Nature Protection (SPPN), Vitalie Ajder – Director, Republic of Moldova Lithuanian Ornithological Society (LOD), Liutauras Raudonikis – Director, Lithuania BirdLife Austria, Norbert Teufelbauer - Coordinator Waterbird Counts, Austria CEEweb for Biodiversity (CEEweb), Csaba Mezei - General Secretary, Hungary



Romanian Ornithological Society (SOR), Dănuț Gheorghe Hulea - CEO, Romania

Vogelbescherming Nederland (VBN), Floris van Kuijk - Head of Conservation, Netherlands

Portuguese Society for the Study of Birds (SPEA), Ana Almeida - Senior Marine Conservation Officer, Portugal

Coordinadora Ecoloxista d'Asturies, Fructuoso Pontigo – Presidente, Spain

BirdLife Estonia, Kaarel Võhandu – CEO, Estonia

BirdLife Italy (Lipu), Danilo Selvaggi - General Director, Italy

Polish Society for the Protection of Birds (BirdLife Poland) (OTOP), Izabela Gadi, Poland

EuroNatur, Gabriel Schwaderer - Executive Director, Germany

BirdWatch Ireland, Oonagh Duggan - Head of Policy and Advocacy, Ireland

Rewilding Europe, Amy Duthie - Head of Upscaling, Netherlands

Rewilding Apennines RA, Mario Cipollone – Director, Italy

Fundación Española de Renaturalización - Rewilding Spain, Mara Zamora - General Manager, Spain

A Rocha France, Rachel Calvert - Board Chair, France

BirdLife Sverige, Daniel Bengtsson - Head of Conservation, Sweden

BirdLife Finland, Aki Arkiomaa - Director, Finland

European Environmental Bureau (EEB), Sergiy Moroz-Policy Manager for Nature, EU

Seas At Risk (SAR), Tobias Troll - Marine Policy Director, EU

Danmarks Naturfredningsforening (DN), Bo Håkansson - Political advisor, Denmark

Association Biom (BIOM), Ivana Selanec - Executive director, Croatia

Latvian Ornithological Society (LOB), Antra Stīpniece - IWC coordinator - president, Latvia

International Fund for Animal Welfare (IFAW) Ilaria Di Silvestre - Director of Policy and Advocacy, Europe

Stichting de Noordzee (NSF), Merel den Held - Project Lead Nature & Sustainable Fisheries, Netherlands

Blue Marine Foundation (BMF), Elisabeth Druel - EU Project Manager, Belgium

BirdLife Europe and Central Asia, Anouk Puymartin - Head of Policy, EU

Naturschutzbund Deutschland e. V./ Nature and Biodiversity Conservation Union (NABU), Konstantin Kreiser - Conservation Director, Germany

Sciaena, Gonçalo Carvalho - Executive Coordinator, Portugal

Eurogroup for Animals, Léa Badoz – Wild Animals Programme Officer, EU



































































