



EIFAAC Secretariat

Send by mail to: EIFAAC-Secretariat@fao.org

Vingsted, June 17, 2025

Comments to the the draft Framework towards the development of a European management plan for the great cormorant.

The senders of the comments are the following organizations.

- Brancheorganisationen Dansk Lystfiskeri
- Lystfisker Danmark (Den Nationale Lystfiskerstrategi)
- Danmarks Sportsfiskerforbund

We thank you for the opportunity to provide comments. We would also like to express our appreciation for the excellent work that has gone into drafting the proposal, which is highly competent in every respect and meets the highest professional standards.

In Denmark, we are experiencing extremely severe negative consequences from cormorant predation. Primarily in freshwater environments, but quite surprisingly, also in marine waters. We have observed a dramatic decline in virtually all non-anadromous fish species in rivers over the past 10–15 years, and it is well documented that cormorant predation is the primary cause. DTU Aqua has estimated a biomass loss of approximately 90% in rivers, including in some of our finest and least impacted habitats.

In addition to the massive loss of biodiversity, this decline has led to the near disappearance of angling traditions that have been practised for generations, for species such as grayling and brown trout.

A common European management plan is therefore extremely relevant, and we fully support this draft and the intentions behind it.

We also understand the need to establish a framework for a future management plan, and that this draft does not yet contain concrete measures to improve the balance between cormorant and fish populations. However, the concern is that the upcoming process of translating these good intentions into tangible actions could become very lengthy. Meanwhile, the situation for the fish continues to deteriorate.

We therefore strongly urge that a section be included with recommendations on how Member States can act to protect vulnerable fish stocks in relation to cormorant predation. The knowledge of cormorants represented in this work is the best available, and no one would be more qualified to undertake this task than the authors or team behind this draft.



This may go beyond the original intentions of the draft, but we also miss a more precise account of the possible options for reducing the cormorant population. We are aware of the legal constraints, but we have seen that other bird species can be managed in ways that do not exclude reductions in population size. How much reduction is acceptable? and how best to achieve it? are two of the important questions we would like to see addressed in the report.

Once again, we thank you for taking the cormorant issue seriously and give our full support to the continued work.

Kind regards,

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