

BSAC RECOMMENDATIONS ON CORMORANTS

To: European Commission, Baltic Sea Member States, HELCOM, ICES

In 2023 and 2024, the Baltic Sea Advisory Council (BSAC) organised two workshops dedicated to seals and cormorants¹. The first workshop dealt with the applicable legislation and research on these two groups of predators in the Baltic Sea. The second one, on 30 October 2024, focused on discussions around conservation and management.

The BSAC wishes to thank participants in the workshops for their contributions which have shed light on the complex issues and considers the work done as an important step forward towards creating a common understanding of how to better balance conservation and management of seals and cormorants.

The BSAC recalls that conservation and management of cormorants take place in a Baltic Sea which is challenged by simultaneous developments, among other species interaction and climate change, eutrophication, and changes in salinity.

The BSAC notes that shortly before its second workshop, on 22 October 2024, the Council of the European Union had an exchange of views on the *need for revised rules to allow for ecosystem-based hunting for cormorants and seals in order to protect sensitive fish stocks*. During this debate most Baltic member states called for a review of the existing legislation, notably an amendment to the existing protection of cormorants under the Birds directive. The Commission representative stated that the Commission felt that the existing derogations were adequate and did not envisage a proposal to amend the said directive. Although many BSAC members at the workshop supported the ideas of their member states to make cormorants management easier, others warned against reopening the Birds directive.

These recommendations below are in relation to cormorants.

The BSAC acknowledges that cormorants have always been part of the ecosystems in the Baltic Sea Basin, although probably never in such numbers seen in relation to mostly very diminished fish stocks, and that the difficult issue at stake is to find the balance between conservation and management of cormorants.

Although, cormorants are not subject of fisheries management in a strict traditional sense, but are an element in the goal of an ecosystem-based fisheries management, cormorants have a direct impact on fish stocks, at least locally, and exert pressure on the same fish stocks as the ones exploited by fishing. At the same time however, an ecosystem-based fisheries management approach would also take account of the fact that fisheries impact cormorants by direct mortality (by-catches), including rare cases of culling in some Member

¹ https://www.bsac.dk/past-meetings/?meeting_search=workshop+predators+seals&meeting_year=&loc=

States, and indirectly by food web interactions. Therefore, the BSAC chose to organise these workshops to reflect the keen interest in cormorants of many of its members across the board.

The BSAC takes note of the requirements under the Marine Strategy Framework Directive² and the Bird Directive, including the derogation possible under Article 9. Article 9 allows for derogations from the general protection regime of the Birds Directive to take the necessary actions, including lethal control, to prevent serious damage to fisheries and aquaculture. Preventive, non-lethal measures should be implemented first.

The BSAC notes the Member States' obligation to monitor and report back to the Commission on freshwater fish every 6 years. This is important for some key Baltic Sea fish stocks such as the salmon and eel stocks.

The Regional Sea Convention of the Baltic, HELCOM, has developed the Baltic Sea Action Plan that list actions relating directly to migratory birds³.

The scientific data presented during the BSAC workshops has given the BSAC a very clear indication that cormorants are no longer threatened in the Baltic. During the workshop it was suggested that the Baltic Sea basin could be home to more than 200 000 breeding pairs of cormorants⁴. Science documents prove that the cormorant induced mortality on fish stocks, including stocks such as cod and eel which are subject to rebuilding measures under the Common Fisheries Policy, can be substantial in places with high density of cormorants⁵. Some scientists recalled that cormorants are highly mobile which lends a clear cross-border aspect to the issues in relation to this bird species.

Provided Member States include this in their operational programmes, EMFAF can provide co-financing to support preventive measures (including lethal control) and to compensate for losses caused by cormorants. Uncertainty remains regarding the availability of such public funds in the middle to long term.

However, these options are applied nationally, instead of, more usefully, being part of regional long-term management with emphasis on preventive measures.

In the light of the above, the BSAC recommends that

- All Baltic Member States in cooperation with the European Commission enhance their cross-border work with a view to implementing regular monitoring and regional

² 4 criteria to assess 'good environmental status' for marine bird and mammal species are defined in the Directive: • Bycatch levels • Population abundance • Species distributional range (same as BHD) • Species habitat extent (same as BHD)

³ Actions: B11, B12, 13, B14, S43, S48, S49, S54

⁴ Council of the European Union, Note submitted by Sweden, supported by Estonia, Finland and Latvia to the Council meeting on 21st-22nd October 2024, (Need for revised rules to allow for ecosystem-based hunting of cormorants and seals in order to protect sensitive fish stocks - Information from Sweden, supported by Estonia, Finland, and Latvia). [pdf](#)

⁵ Presentation from 2023 BSAC workshop on predators [til Niels Jepsen](#); National Institute of Aquatic Resources, Denmark

Baltic management and conservation, for instance including a central coordination unit.

- Ongoing science, especially with a regional focus, continues, among others to provide input to ensure that ICES can provide advice which takes better account of all sources of mortality, including predation mortality. This might require broadening of existing data collection activities.
- The inter-species interaction is not yet adequately addressed in European environmental and fisheries legislation. i.e. the protection of one species (for example cormorants) should not be detrimental to the good status of another one (for example Baltic fish stocks).
- Favourable conservation status levels of numbers of breeding pairs should be created and maintained for cormorants in the Baltic Sea region at the appropriate geographical scales and local carrying capacity, based on the best available science.
- All Baltic Member States include, as a matter of urgency, in their operational programmes provisions for support of especially preventive, non-lethal measures, but also compensation to fishers and aquaculture operators who suffer serious damage.
- The Commission, Member States, HELCOM and ICES, continue to involve BSAC stakeholders on this topic as the ones primarily affected.

The BSAC resolves to return to this important issue at a later stage.
