



EBFA contribution to the call for evidence on
EU Marine Strategy Framework Directive
Transparency Register Number: 316352847882-84

Brussels, 2 March 2026

General remarks

The European Bottom Fishing Alliance (EBFA) welcomes the evaluation of the Marine Strategy Framework Directive (MSFD) and the Commission's intention to revise it in the context of the forthcoming European Ocean Act.

EBFA supports the Commission's objectives for the MSFD revision: effective marine protection, improved coherence and data comparability, and genuine simplification with reduced administrative burden. For the fishing sector, achieving and maintaining Good Environmental Status must not be a theoretical exercise. Healthy and productive seas underpin fisheries, coastal communities and Europe's food supply. Environmental sustainability must therefore be pursued in a way that also safeguards economic viability and social resilience.

EBFA supports maintaining an ambitious but realistic environmental framework, provided it is grounded in robust science and ensures balanced measures across all maritime sectors. It should avoid imposing additional constraints on sectors that are already highly regulated and socio-economically vulnerable. Also, simplification should enhance clarity and coherence, not create fragmented rules or undermine legal certainty.

In this context, EBFA considers that the revision of the MSFD should focus on improving the Directive's operability, coherence and legal clarity. In particular, it should:

Clarify the Concept of Good Environmental Status (GES)

- GES must not be interpreted as a return to a pristine, activity-free marine environment.
- Fully recognize maritime activities, particularly fishing, as an integrated component of the ecosystem that must be managed — not systematically excluded- to achieve environmental goals.
- Revise and simplify criteria, indicators, thresholds and methodological standards for GES, including those established in Commission Decision 2017/848. Provisions that are scientifically unworkable, methodologically underdeveloped, or impossible to effectively support and implement should be simplified, revised or removed to ensure a framework that is credible, transparent and realistically enforceable.



Ensure legal coherence

- The MSFD and the subsequent Ocean Act must remain a flexible framework Directive, allowing Member States to adapt implementation to regional/local realities.
- Fisheries management objectives must remain anchored in the CFP, with F_{MSY} as the primary sustainability benchmark for commercial stocks.
- The MSFD must be coherent with existing fisheries and environmental legislation.
- Duplication, conflicting objectives and overlapping measures must be avoided.

Adopt a holistic, ecosystem-based approach

- Marine pressures must be assessed cumulatively across all maritime sectors, not disproportionately focused on fisheries.
- The growing impacts of offshore wind farms, submarine cables, tourism, artificial reefs and other expanding uses must be fully evaluated.
- Climate change must be explicitly integrated into MSFD implementation, as warming, acidification and deoxygenation are major drivers of ecosystem change.
- The sea–land connection must be strengthened, ensuring that land-based pollution and runoff are addressed in parallel with maritime activities.

Safeguard proportionality in Marine Spatial Planning

- The rapid expansion of offshore renewable energy and other maritime uses is creating a significant spatial squeeze for fisheries.
- Protection measures, including MPAs, must be scientifically justified, proportionate and evidence-based, and designed to complement — rather than duplicate, contradict or undermine — existing management frameworks.
- Fishing grounds should not be systematically restricted where no significant environmental risk exists or where socio-economic costs would be disproportionate.
- Clear guidelines are needed to define compatible and non-compatible maritime uses.

Strengthen governance, simplification and funding

- Governance under the Ocean Act should improve coordination between DGs, break down administrative silos, consider the transboundary nature of the sea by strengthening regional cooperation, respect subsidiarity (particularly in territorial waters), and ensure meaningful stakeholder involvement.
- Streamlined reporting requirements and better alignment with existing fisheries data collection systems.
- Bring ocean-related environmental targets together in one legislative act without introducing new ones.
- Simplification that genuinely reduces administrative burden for fishers and coastal communities.
- Provide adequate and predictable funding to match the Directive's ambition, including for monitoring, data collection and analysis, innovation, implementation support and compensation.
- The projected 67% reduction in fisheries funding under the next MFF risks undermining environmental ambition and policy credibility.



EBFA also stresses the need to recognise the significant efforts already undertaken under existing EU policies — in particular the CFP — and to allow time for adopted measures to produce measurable ecological results before introducing additional constraints. Ecological recovery processes are often slower than regulatory cycles, and policy credibility depends on the reliable evaluation of existing measures.

Finally, the implementation of the MSFD must clearly reflect that conservation and competitiveness are not contradictory objectives, but mutually reinforcing ones. The conservation of marine ecosystems should be seen as an opportunity for the EU fleet to continue modernising, innovating and improving its environmental performance, not as a way to reduce fishing capacity or access to traditional fishing grounds. Through innovation, improved management and coherent policy integration, the MSFD can strengthen the long-term viability of the fishing sector while ensuring that EU fishers continue to provide healthy, sustainable food to European citizens.

1. Concept of Good Environmental Status

One key question that needs to be tackled for the MSFD to move forward is whether a good status should refer to a pristine ecosystem, excluding all anthropogenic activities, or should consider anthropogenic activities as an integrated component of the ecosystem.

Anthropogenic activities occurring in an ecosystem, however well managed they are, are creating opportunities and threats for ecosystem structures, functions and/or biodiversity. These opportunities and threats evolve with the variation of activities, but as often mistaken, the decrease of activities is not strictly correlated to a decrease of threats nor an increase of opportunities. The marine ecosystem is more complex than that. The example of the creation of offshore windfarms can be used to illustrate this idea as it tends on the short term to induce a shift in ecosystem characteristics from pelagic to benthic. Thereby creating opportunities for benthic organisms but threats for pelagic ones¹. Another example is the occurrence of bottom trawling that removes organisms from the seabed creating opportunities through available space for other organisms such as resistant benthic organisms², deep burrowers³ and infaunal communities⁴.

Ecosystems are inherently dynamic and evolve over time through processes of ecological succession, moving from colonising pioneer species to a more complex community structure under prevailing environmental conditions. These stages are not linear nor permanent, and multiple stable configurations may exist depending on time, natural variability and disturbance. All successional stages contribute to ecosystem functioning, resilience and biodiversity. Therefore, the objective of achieving GES should not be interpreted as restoring ecosystems to a theoretical or static “climax” state, but rather as maintaining ecosystem structure, functions and productivity within the bounds of natural variability while ensuring resilience and sustainable use.

¹ Si et al, 2025, [Offshore wind farms can enhance the structural composition and functional dynamics of coastal waters](#)

² Van Denderen et al, 2013, [When does fishing lead to more fish? Community consequences of bottom trawl fisheries in demersal food webs](#)

³ Tiago et al, 2020, [Experimental bottom trawling finds resilience in large-bodied infauna but vulnerability for epifauna in the Frisian Front](#)

⁴ Kaiser et al, 2001, [Chronic fishing disturbance has changed shelf sea benthic community structure](#)

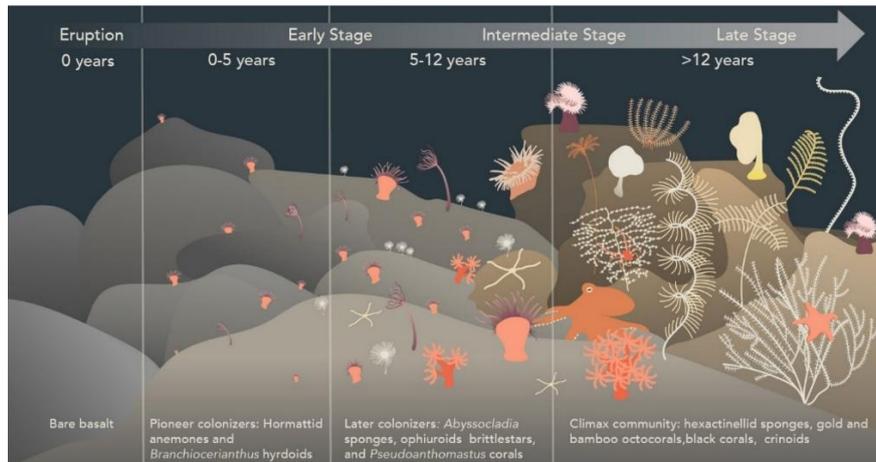


Figure 1. Ecological succession on the erupting Vailulu's deep seamount⁵

Overall, even when carefully managed and designed to minimise their footprint, anthropogenic activities may result in ecosystems that differ from their pristine, undisturbed state.

The current GES definition under the MSFD explicitly refers to safeguarding uses and activities. Therefore, anthropogenic activities should be recognised as an integral component of marine ecosystems. EBFA agrees that such activities must be managed in the best possible way to aim for a state where key characteristics of the habitat type, in particular its structure, functions and typical species/species group are maintained at a level of ecological integrity, stability and resilience necessary to ensure its long-term viability. This approach contributes to reaching and maintaining favourable conservation status.

Following the above considerations, the MSFD — notably its indicators and thresholds — as well as Commission Decision (EU) 2017/848, should be revised to reflect this integrated and ecosystem-based understanding.

2. Descriptors, indicators and thresholds of the Marine Strategy Framework Directive

The achievement of GES under the MSFD depends fundamentally on the clarity, robustness and operability of its descriptors, indicators and associated thresholds. While the Directive established a common framework, important knowledge gaps persist regarding the status of many marine habitats and species. In parallel, the increasing reliance on methodological indicators and quantitative thresholds — notably through the Commission Decision (EU) 2017/848 — has progressively transformed qualitative descriptors into de facto binding quantitative targets, often without sufficient political debate or socio-economic assessment. In this context, caution is required to avoid a shift towards pressure-based indicators that assume a direct and systematic link between the presence of a pressure and ecosystem degradation. Such an approach risks oversimplifying ecological complexity and promoting automatic restrictions rather than outcome-based management focused on ecosystem condition and functionality.

⁵ Herrera et al, 2023, [From basalt to biosphere: Early non-vent community succession on the erupting Vailulu'u deep seamount](#)



The scientific basis of indicators and thresholds needs to be revised, and the comparability of data improved. In addition, they must remain adaptable and regionally sensitive considering the ecological diversity of European seas.

Descriptors

- **Descriptor 3: Commercial fish and shellfish**

EBFA recalls that 900 different species or groups of species are landed by fishing vessels registered in the EU⁶ and this number doesn't take into account the number of bycatch species. EBFA supports the objectives of preventing human-induced biodiversity decline and maintaining ecosystem functionality. But the application of the Commission Decision (EU) 2017/848, notably the requirement to assess every single species, including "*any important species on a regional or national scale for small-scale/local coastal fisheries*" is not feasible from a scientific, methodological, or operational perspective. A more risk-based and proportionate approach, such as those taken by ICES and STECF, would be necessary to ensure effective implementation while maintaining biodiversity safeguards.

Also, descriptor 3 on exploited species, as operationalised in the MSFD, raises a major legal coherence and consistency issue. As such, fishing mortality is primarily used to determine the impacts on commercial fish and shellfish through extraction of species by fishery, while biomass indices ($B \geq BMSY$) as well as age and size distribution are used to determine the environmental status of the species. fishing mortality at Maximum Sustainable Yield (Fmsy) constitutes the primary sustainability benchmark and internationally recognised reference point. Achieving Fmsy is already a demanding objective in scientific, management and operational terms. Introducing additional or parallel sustainability descriptors creates confusion, frustration and inconsistent policy objectives, notably stocks that are healthy under the CFP could be considered unhealthy under MSFD.

The MSFD therefore goes beyond what is required under the CFP and fails to take into account more concretely the reality of mixed fisheries, for which multiannual plans recognise the need to use ranges of values but also pressures apart than that of fisheries. F_{MSY} must therefore remain the primary and authoritative indicator for commercial fish and shellfish populations under the future MSFD.

- **Descriptor 6: Seabed integrity**

In line with the need to consider anthropogenic activities as an integrated part of marine ecosystems, the key question regarding seabed integrity concerns the reference level against which seabed condition is assessed as good. Indeed, ensuring long term maintenance and reaching or maintaining favourable conservation status can be done with various levels of ecological integrity, stability and resilience. This point is fundamental, as the entire assessment of descriptor 6 depends on it, with potentially significant consequences for anthropogenic activities, particularly fishing, which could be subject to severe restrictions or even extensive spatial closures.

⁶ [Popescu et al, 2024, Handbook of fish species exploited in the EU](#)



This debate mirrors the one surrounding vulnerable marine ecosystems, contrasting a conservation approach—aimed at preventing significant adverse impacts—with a restoration approach, which may imply a substantial or even total cessation of activities to enable restoration of ecological processes and services. If the objective is conservation, closing already heavily impacted areas with little or no sensitive habitat may not be proportionate. By contrast, restoration inherently requires significant activity reductions. Yet this distinction remains blurred by ongoing ambiguity about the overall objective, compounded by the lack of clarity in defining GES and linkages with the Nature Restoration Regulation, which ultimately weakens the coherence and effectiveness of the MSFD framework.

It should be emphasized that resolving these ambiguities is not a scientific matter, but a political one. Scientists can inform decision-makers about the ecological consequences of different threshold levels, but they cannot define normative objectives on their own. In order to move forward, indicators and thresholds must be based on a sound ecological foundation, which takes into consideration socio-economic impacts as well as food security needs. This reinforces the need for clear political guidance prior to scientific work.

- **Descriptors inter-dependence**

While descriptors are currently assessed in silos, the revision of the MSFD should consider the inter-dependence of most of them. Indeed, the descriptors Non-indigenous species, Food web, Eutrophication, Seabed integrity, Hydrographical conditions, Contaminants, Energy and Marine litter can all impact Commercial fish and shellfish. Also, seabed integrity can be affected by Hydrographical conditions, Contaminants, Eutrophication, Energy and Marine litter.

More specifically on the marine litter descriptor, EBFA recalls that million tonnes of plastic are already present in the oceans and, to avoid the projected annual input increase, a need for attention to the results of the ongoing call for evidence on Rules on single-use plastic and fishing gear is necessary.

At the moment, a large share of marine litter is attributed to fishing gear resulting in targeted actions towards this activity. More recent figures drastically reduce to 2.5% the contribution for fishing gear to marine litter⁷. Considering this update, EBFA urge the commission to redirect and adapt the ongoing regulations and reporting requirement to the most concerned activities.

On a global scale, considering that 88–95% of the global plastic load entering the seas comes from ten rivers, eight in Asia and two in Africa, and bearing in mind that at international level only ‘Voluntary Guidelines for the Marking of Fishing Gear’ exist, EBFA urges European institutions to address the issue through ocean diplomacy in the ongoing plastics Treaty negotiations by using the momentum of the recent chair election⁸.

⁷ EEA, 2024, *Marine Litter Watch – europe’s beach litter assessment*

⁸ <https://www.ciel.org/news/inc-5-3-reaction/>



Thresholds

In the MSFD, GES is defined as a qualitative objective and is operationalised through 11 qualitative descriptors. Because these descriptors are qualitative, threshold values have been introduced through Commission Decision (EU) 2017/848 to support their implementation. While initially intended to address non-essential methodological elements, these thresholds increasingly function in practice as binding quantitative targets. This evolution raises significant governance and procedural concerns for EBFA.

We consider that this development can only be envisaged if it is based on robust scientific work, developed under the mandate of EU co-legislators in close and transparent dialogue with the scientific community and relevant stakeholders.

European waters form a complex and highly intertwined patchwork of ecosystems. Member States are not confronted to the same challenges when it comes to reaching Good Environment Status. For instance, although Ireland and France both implement the MSFD within the OSPAR framework, their situations differ considerably in terms of geographic scope, governance arrangements and environmental conditions. Ireland manages a single vast marine region in the North-East Atlantic, largely offshore and deep-sea, requiring a focus on large-scale habitat mapping and deep-sea biodiversity. France, by contrast, implements the Directive across four distinct sub-regions — the English Channel/North Sea, the Celtic Seas, the Bay of Biscay and the Mediterranean — necessitating multiple tailored strategies and coordination with different neighbouring countries. Therefore, EBFA highlight the need to keep the MSFD in its Directive framework, allowing Member States the required flexibility to defining and implementing appropriate measures to achieve its objective.

Also, EBFA expresses strong reservations about the eventual introduction of pressure reduction targets that are presented as easier to track, monitor and enforce. The Directive's implementation often assumes that the presence of a given pressure necessarily results in habitat degradation and therefore requires systematic reduction or removal of that pressure. Such an approach is conceptually and operationally problematic. It implicitly treats anthropogenic activities as incompatible with GES, thereby limiting the possibility of coexistence between well-managed activities and biodiversity objectives. This binary reasoning fails to reflect the complexity of marine ecosystems previously presented, their adaptive capacity, and the contribution of existing management measures under other sectoral policies.

An example of eventual bias is the use of VMS as an indicator of fisheries environmental pressure. It has been demonstrated that the coast resolution of VMS tends to overestimate fishing footprints and distort conclusions relative to the real pressure fisheries has on environment^{9,10}.

By focusing predominantly on pressures rather than on observed ecosystem state and functionality, the MSFD risks promoting spatial exclusion as a default response, regardless of demonstrated environmental outcomes. This approach reduces the capacity to design balanced

⁹ Amoroso et al, 2018, [Comment on "Tracking the global footprint of fisheries"](#)

¹⁰ Nielsen et al, 2025 [The dual purpose of high spatiotemporal resolution of electronic monitoring data in fisheries](#)



solutions reconciling ecological objectives with the socio-economic sustainability of maritime sectors, particularly fisheries.

More fundamentally, a strictly pressure-driven framework is inconsistent with the integrated and sustainable development principles promoted by international conventions and the UN Sustainable Development Goals, which call for reconciling environmental protection, food security and economic viability.

In light of the above, EBFA calls for maintaining the MSFD as a flexible framework Directive, grounded in robust science, considering regional specificity and allowing meaningful stakeholder involvement. Any move towards binding quantitative thresholds or pressure-reduction targets must be carefully assessed to avoid legal uncertainty and disproportionate impacts on sustainable fishing activities. The achievement of GES should remain ecosystem-based, ensuring that environmental protection is reconciled with food security, coastal livelihoods and the EU's strategic autonomy.

3. A holistic approach

EBFA fully agrees with the Commission's observation in its consultation on the need to strengthen the resilience of marine ecosystems to cumulative pressures. However, this objective can only be achieved if the MSFD is part of a holistic ecosystem-based approach based on sound knowledge, proportionality across sectors and coherent maritime policies, rather than on an accumulation of regulatory constraints that are insufficiently coordinated.

Such an approach must explicitly integrate the accelerating impacts of climate change which increasingly shape ecosystem dynamics and fisheries productivity. It must also take into account the current situation of the fishing sector, which has undergone profound structural adjustment and delivered measurable sustainability improvements, yet remains economically vulnerable and exposed to growing spatial and regulatory pressures.

Strengthening ecosystem resilience therefore requires balanced and evidence-based governance that assesses cumulative impacts across all maritime uses, recognises past efforts, and ensures that environmental ambition is reconciled with socio-economic sustainability and food security objectives.

Other maritime uses

European marine waters host a wide range of activities: fishing, aquaculture, offshore energy production, oil and gas extraction, mineral and aggregate extraction, maritime transport, military activities, protected areas, scientific research, submarine cables and pipelines, tourism and underwater cultural heritage.

Under Annex III of the MSFD, Member States are required to take into account the pressures and impacts of anthropogenic activities across marine regions. In practice, however, implementation often focuses disproportionately on fisheries, while other sectors are not always addressed with equivalent scrutiny. Focusing on a limited number of activities risks

misidentifying priority pressures and undermining the comprehensive assessment of cumulative impacts.

- **Submarine cables¹¹**

Submarine cables constitute a crucial infrastructure for the European Union, carrying approximately 99% of intercontinental internet traffic. Their transmission capacity is estimated to be around 100 times greater than that of satellites, and in the event of damage they can be repaired within weeks, whereas satellite replacement may take months.

While submarine cables are associated with defence and national security considerations, EBFA stresses the need to clearly distinguish strategic military cables and general public telecommunication ones. EBFA fully recognises the importance of protecting strategic military cables, particularly in the context of recent disruptions suggesting that certain infrastructures may be exposed to hostile acts. However, the environmental and spatial implications of general telecommunication cables should be assessed transparently and proportionately within the MSFD framework.

Submarine cables – exposed and buried – are not without environmental impact, especially with regard to seabed integrity. Prior to installation, a corridor of several hundred metres wide is cleared to remove elements that could compromise cable integrity. In waters shallower than 1,500 to 2,000 metres, cables are typically buried in the seabed. A trench approximately one to one and a half metres deep — and up to three meters for particularly sensitive cables — is excavated over hundreds of kilometres, corresponding to the length of the cable, to allow burial. Finally, retrieval operations may involve dragging heavy equipment across the seabed in order to hook and lift the cable.

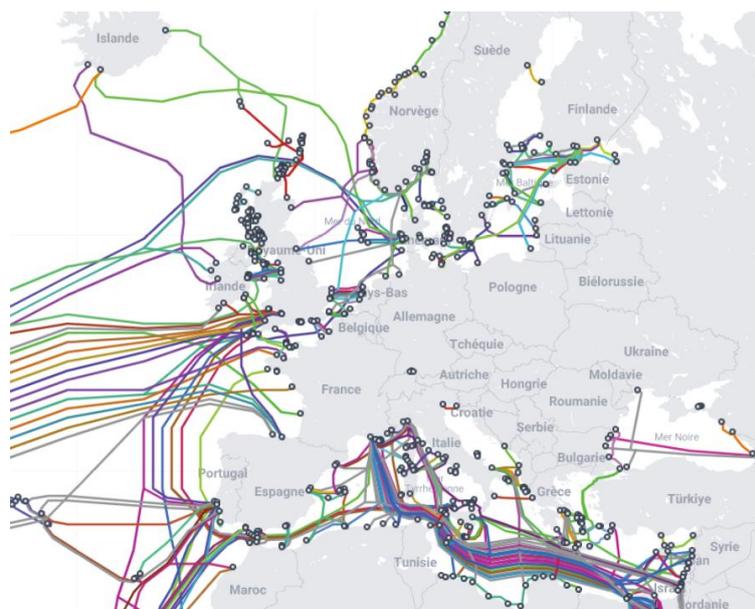


Figure 2. EU submarine cables for general public telecommunication¹²

¹¹ Marine Academy conference, Yves Noël MASSAC, the work of a submarine cable ships

¹² <https://www.submarinecablemap.com>



Cables are typically designed for a minimum operational life of around 25 years, yet rapid technological evolution often results in earlier replacement. Historically, decommissioned cables were left in place on the seabed. Fortunately, more recently, operators may retrieve them either to free space in congested areas — such as parts of the Mediterranean — or to recover valuable materials such as copper. However, many remains and cables buried at significant depth are not technically removable, eventually leading to seabed contamination. In addition, cable deployment is expected to increase exponentially with the expansion of offshore wind farms.

In this context, EBFA calls for proper impact assessments, concrete measures to reduce seabed disturbance during installation, maintenance and retrieval operations and mandatory removal of inactive cables where technically feasible.

Also, interactions with fishing activities raise operational and socio-economic concerns. International rules prioritise cable integrity, meaning that when fishing gear becomes entangled with a cable, fishers are required to abandon their equipment. EBFA considers necessary to revise priorities by considering the distinction previously mentioned between strategic military cable and telecommunication ones. Especially considering military cables localization is not always public and cables are not always buried. Indeed, in rocky seabed areas, burial is not technically possible, leaving cables exposed on the seabed. Additionally, in areas characterised by strong currents and sediment mobility, such as parts of the English Channel and the southern North Sea, buried cables may become re-exposed over time, increasing the likelihood of renewed interaction. In light of the above, fair and effective compensation mechanisms to address gear losses incurred by fishers as a result of cable interactions should be reinstated.

EBFA notes that the European Commission has recently allocated €347 million to strengthen submarine cable infrastructure, recognising that these systems are essential for modern life and the European economy¹³. EBFA hopes that this investment will also support improved environmental safeguards, responsible lifecycle management and better coexistence with fisheries.

- **Offshore windfarms¹⁴**

The rapid expansion of offshore renewable energy is significantly reshaping Europe's marine space, particularly in coastal and shelf waters where fishing activities are also concentrated. While EBFA recognises the strategic importance of renewable energy for climate neutrality

¹³ https://ec.europa.eu/commission/presscorner/detail/en/ip_26_327

¹⁴

- [Si et al, 2025, Offshore wind farms can enhance the structural composition and functional dynamics of coastal waters](#)
- [Squire et al, 2026, Understanding the role of offshore energy structures in ecosystem service delivery](#)
- [Hengstmann et al, 2025, Chemical emissions from offshore wind farms](#)
- [Mattson et al, 2026, Efficient finite difference modeling of infrasound propagation in realistic 3D domains](#)
- [Wawrzynkowski et al, 2026, Balancing wind energy expansion and fisheries in the Mediterranean Sea](#)
- [Thomassen et al, 2025, Case-dependent impacts of offshore wind farms on ecosystems](#)
- [Watson et al, 2025, Assessing, monitoring and mitigating the effects of offshore wind farms on biodiversity](#)
- [Silva et al, 2026, A Framework for monitoring the socio-economic impacts of offshore wind energy development on fisheries](#)



and energy autonomy, the development of offshore wind farms must be assessed within a comprehensive and science-based framework that accounts for their full lifecycle impacts and cumulative effects.

Offshore wind farms interact with a wide range of environmental descriptors under the MSFD. During the construction phase, activities such as pile driving, seabed preparation and cable installation generate intense underwater noise, sediment resuspension and localised habitat disturbance. Pile driving can affect marine mammals and fish behaviour, while trenching and cable burial disturb benthic habitats over considerable distances.

During the operational phase, impacts are more complex and case dependent. The physical presence of turbine foundations and associated infrastructure modifies hydrodynamic conditions and seabed characteristics. Colonisation of monopiles by sessile organisms can create artificial reef effects. However, these structural changes may also modify species composition, favour opportunistic species, and alter food-web interactions in ways that are not yet fully understood.

In addition, offshore wind farms may generate chemical emissions from anti-corrosion systems, produce continuous operational noise and low-frequency vibrations, and contribute to electromagnetic fields associated with subsea cables. The ecological consequences of these factors vary across species and habitats and remain subject to ongoing research.

In many cases, fishing activities are restricted or excluded within wind farm areas for safety reasons, leading to displacement of fishing effort. Such displacement can increase pressure in other areas, with indirect consequences for both ecosystems and fisheries management objectives, including the achievement of MSY and Good Environment Status under the MSFD.

Scientific reviews emphasise that the impacts of offshore wind farms are highly context-specific, depending on site characteristics, design, scale and cumulative interactions with other pressures. Some ecological changes may be locally positive, others negative or uncertain. This diversity of outcomes underscores the need for site-specific environmental impact assessments, adaptive monitoring and transparent evaluation of long-term ecosystem effects.

Furthermore, not all marine regions are equally suitable for offshore renewable energy development, and this geographical variability must be properly considered when setting future deployment targets.

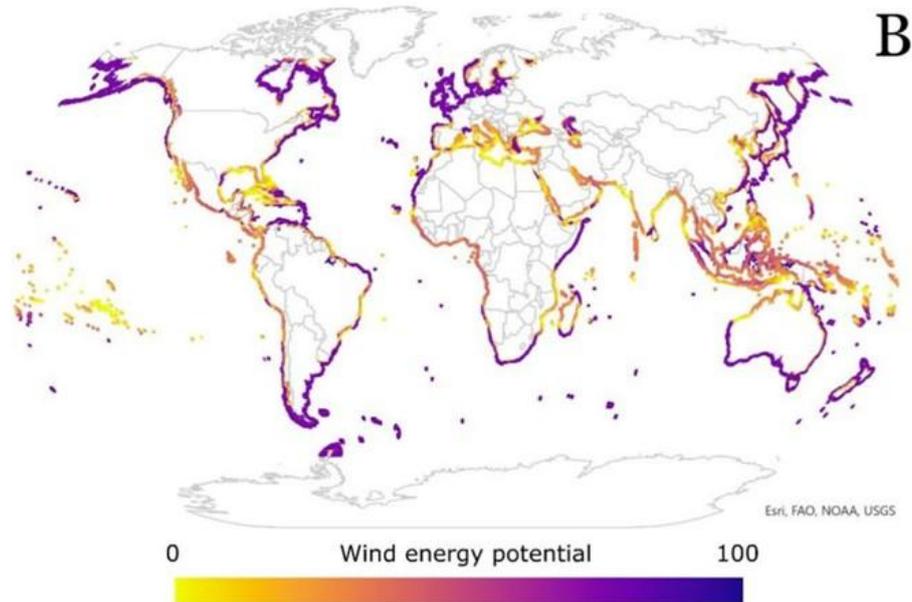


Figure 3. World wind energy potential¹⁵

EBFA therefore calls for offshore renewable energy development to be integrated into a genuinely ecosystem-based and proportionate spatial planning framework. Impacts on biodiversity, seabed integrity, fisheries productivity and cumulative pressures must be assessed holistically. Renewable energy expansion should not automatically result in the systematic exclusion of fishing activities without socio-economic evaluation and clear justification.

- **Tourism**

Coastal and marine tourism exerts increasing pressure on sensitive ecosystems. In certain Mediterranean regions, tourism intensity exceeds the ecological carrying capacity of coastal areas, contributing to pollution and habitat degradation.

The role of tourism in cumulative marine pressures must be acknowledged in MSFD implementation. Marine Protected Areas may generate tourism benefits in some contexts, but they may also concentrate pressure if not properly managed. Any projected tourism gains should therefore be evaluated realistically. When using projections based on previous research, they must be carefully adapted to the specific local context, to avoid overestimations or misapplications. A holistic framework requires that tourism impacts be addressed alongside other maritime uses.

- **Artificial reefs**

Artificial reefs represent one of the fastest-growing forms of marine construction globally, third after aquaculture and commercial ports. While sometimes promoted as conservation or

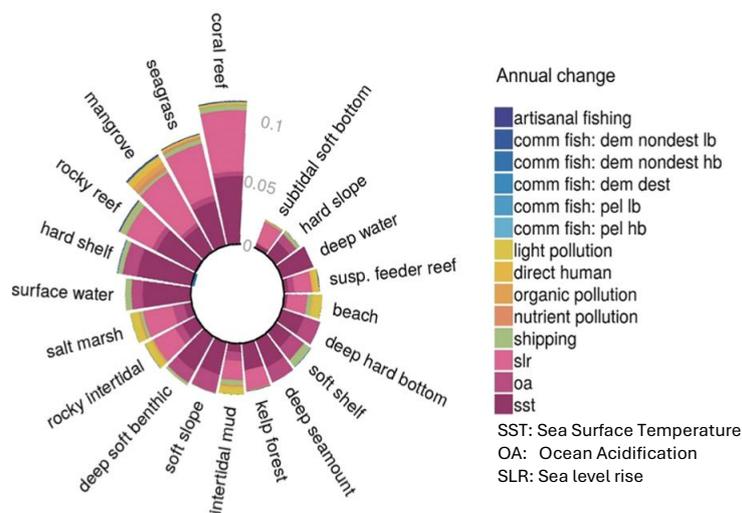
¹⁵ Cisneros-Montemayor et al, 2026, [Ocean renewable energy for equitable energy access in a Blue Economy](#)

fisheries enhancement tools, their ecological effectiveness and long-term impacts require careful evaluation and oversight. Protection and restoration objectives must not be substituted by infrastructure-based solutions without clear ecological evidence¹⁶.

Artificial reefs may have mixed effects on fish stocks. While they can appear to increase local fish abundance, this often reflects aggregation rather than a genuine increase in biomass, as fish may simply relocate from surrounding areas to the new structure. This concentration can benefit some reef-associated or commercially valuable species, but it may also increase predation pressure, intensify competition, or disadvantage species that depend on open or natural habitats. As a result, artificial reefs do not automatically enhance overall stock productivity and their effects must be assessed at the ecosystem scale, not only at the site level.

Climate change

The limited integration of climate change within the current MSFD framework constitutes a significant gap. Ocean warming, acidification and deoxygenation are the main existing threats and pressures to the ocean¹⁷.



Recent studies indicate a particular attention to the seafloor considering bottom marine heatwaves are increasing in frequency and intensity, in the Mediterranean¹⁸ and on the northwestern European shelf¹⁹, where seafloor heatwaves may outpace surface events. These developments directly affect benthic habitats, species resilience and fisheries productivity.

Climate change should therefore be more explicitly integrated into MSFD implementation, potentially through strengthened assessment mechanisms or a dedicated descriptor. Without accounting for climate-driven variability, environmental status assessments risk misattributing ecosystem changes to anthropogenic sectors.

¹⁶ [Allgeier and Griffith, 2025, Greenwashing Marine Conservation: The Use of Artificial Reefs for Fisheries and Coral Restoration](#)

¹⁷ [Halpern et al, 2019, Recent pace of change in human impact on the world's ocean](#)

¹⁸ [Konsta et al, 2026, Increasing bottom marine heatwaves pose a critical risk to Mediterranean benthic species](#)

¹⁹ [Wilson et al, 2025, Seafloor marine heatwaves outpace surface events in the future on the northwestern European shelf](#)



The fishing sector situation

In the last decades, the fishing sector has undergone substantial structural adjustments and endured enormous amounts of restrictions to actively contribute to the recovery of fish stocks and help achieving Good Environment Status targets.

The reward for these efforts can be observed thanks to multiple encouraging figures:

- The European Commission (DG MARE) recently highlighted that the proportion of EU-managed stocks located in the Atlantic fished in line with the maximum sustainable yield, rose from 50% in 2013 to 100% in 2023²⁰.
- The FAO report *'Review of the State of World Marine Fishery Resources 2025'*²¹ indicates that in the Northeast Atlantic, 75.8% of assessed fish stocks are considered biologically sustainable—a figure that rises to 86.6% when weighted by catch volume (landings). For tuna, the results are particularly impressive, with 99.3% of global landings coming from sustainable sources thanks to the successful implementation of robust management plans by Regional Fisheries Management Organizations (RFMOs).
- The GFCM report *'The State of Mediterranean and Black Sea Fisheries 2023'*²² illustrates that the percentage of overexploited fish stocks in the region has fallen from 73% in 2020 to 58% in 2021, representing the lowest rate observed since the trend in overexploitation was first reversed a decade ago.

But these achievements have been realized without considering the increasing pressure on EU fisheries, leading the sector to a period of profound fragility and uncertainty. Since 1990, the fleet has contracted by more than half²³, vessels are ageing, with an average age exceeding 36 years²⁴, since 2000 full-time employment has fallen by approximately one third and the fishing activity fell by around 50% on average (as shown in the figure below). Unfortunately, the situation is getting worse.

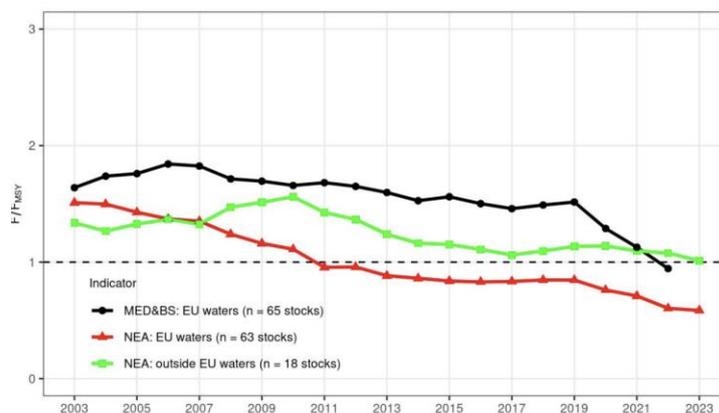


Figure 4. Trends in fishing pressure 2003-2023 (STECF)

²⁰ https://ec.europa.eu/commission/presscorner/detail/es/qanda_25_2556

²¹ <https://www.fao.org/about/fao-unoc-series/2025/fao-global-marine-fish-stock-assessment/en>

²² FAO, 2023, *The state of Mediterranean and Black sea fisheries*

²³ UNCTAD, 2024, *Energy transition of fishing fleets - opportunities and challenges for developing countries*

²⁴ EU, 2025, *facts and figures on the common fisheries policy*

EBFA highlight that the EU is the only region in the world where production is decreasing and regrets the lack of support to this strategic activity. Especially in a context where other countries, with whom EU is facilitating trading agreements, are investing in this sector such as India²⁵ and Indonesia²⁶.

Marine Spatial Planning

While the fishing sector has significantly contributed, at a great cost, to the recovery of fish stocks, environmental stewardship and getting closer to Good Environment Status targets, other sectors are still missing assessment and/or are expending.

The expansion of other maritime uses has created a growing spatial squeeze, making it increasingly difficult to determine where future activities — including fishing — can sustainably take place. Moreover, mobile activities such as fisheries are inherently dynamic and do not lend themselves easily to fixed geographical allocation within Marine Spatial Planning, as they are more complex to represent and manage through static maps.

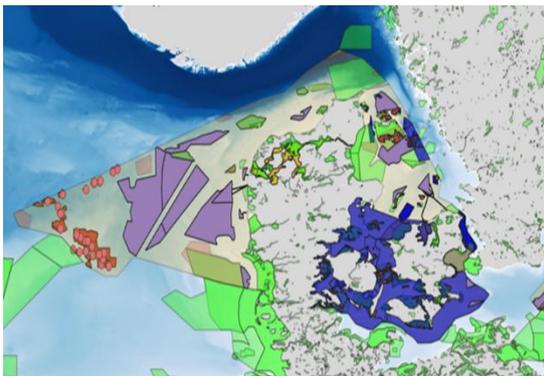


Figure 5. Denmark's maritime uses

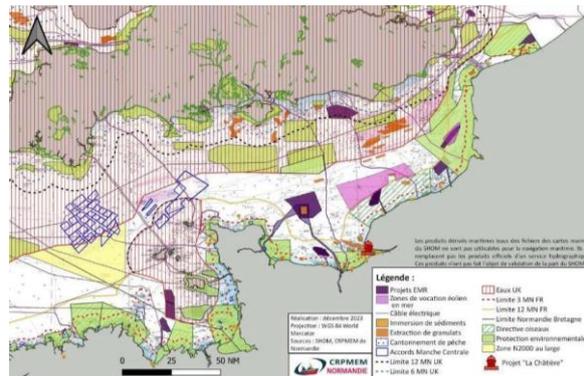


Figure 6. English Channel's maritime uses

Although fisheries are the oldest and most traditional use of EU waters, there is growing legal, scientific and practical uncertainty about where they can operate — and where they may be excluded. For example:

- Legally, fisheries – a significant contributor to Europe's food security - are often treated as a lower-priority use compared to defence, marine energy and submarine cables and are required to avoid them, thereby reducing access to traditional fishing grounds and limiting operational opportunities.
- Scientifically, studies highlight habitat alteration and ecosystem changes from offshore windfarms that justify exclusion from Marine Protected Areas. These diverging interpretations often lead to additional spatial designations, further reducing available fishing grounds.

²⁵ [Seafoodsource, 2026, India proposes record fisheries budget to lift output, exports after big EU, Us deals](#)

²⁶ [Le Marin, 2026, L'indonésie va construire plus de 1500 navires de pêche d'ici trois ans, avec le soutien du Royaume-Uni](#)



- Practically, offshore wind farms are occasionally portrayed as potential new fishing grounds. Yet most fishing practices are banned within or around these structures. In addition, interactions with the associated infrastructure increase safety concerns (including insurance issues), and question remains on whether commercial catches are actually available and can be realistically accessed.

Considering the important spatial squeeze, and in line with recent political clarifications provided by Commissioner Costas Kadić, Member States should not be required to take specific conservation steps where there is no significant risk to the marine environment, nor where the socio-economic costs would be disproportionate. Also, protection measures should be taken, provided that they are properly justified. More specifically, EBFA calls on the Member States attention to not systematically use MPAs as a protection tool as they can affect significantly fisheries socio-economy without necessarily providing environmental benefits²⁷ by lacking efficiency in various situations such as migratory, broad-ranged²⁸ and generalist²⁹ species, species bycatch³⁰ and climate change^{31,32}.

As an alternative, EBFA recalls that it is not because it is not labelled as protected that a fishing area is not highly regulated. For instance, actual fisheries regulation allows the closure to bottom trawling of 69% of GFCM fishing grounds and 97% of NEAFC. Furthermore, fishing gear each have environmental advantages and drawbacks. EBFA therefore cautions against targeting specific gears in isolation, as the diversity of fishing methods helps distribute effort and pressures, contributing to a more balanced and adaptable management of marine resources.

Finally, EBFA draws attention to the potential risks of disproportionate species protection measures, which is disrupting ecosystem balance in certain sea regions (e.g. Baltic) by prioritising charismatic or umbrella species — often located at the top of the trophic chain — without fully considering broader food-web dynamics^{33,34}.

In this context, EBFA calls for more balanced approaches that integrate the ecological impact of these species within marine ecosystems, alongside the development of clear guidelines defining compatible and non-compatible maritime uses from legal, scientific and practical perspectives. Greater clarity would enhance predictability, reduce conflicts and support balanced spatial planning.

EBFA also urges the Commission to safeguard fishing grounds and to conduct a comprehensive, transparent and ecosystem-based assessment of the cumulative impacts of maritime policies adopted in recent years. Such an evaluation should compare how different maritime sectors — including fisheries, offshore energy, transport and tourism — have been affected by regulatory developments, taking into account indicators such as industry size, number of employment, productivity and spatial access.

²⁷ [Petra et al. 2023, Contribution of area-based fisheries management measures to fisheries sustainability and marine conservation: a global scoping review](#)

²⁸ [Mouton et al. 2025, Shortfalls in the protection of Important Shark and Ray Areas undermine shark conservation efforts in Central and South American Pacific](#)

²⁹ [Gutowky et al. 2026, A half century of monitoring reveals contrasting survival responses of Icelandic seabirds to climate and fisheries pressures](#)

³⁰ [Pons et al. 2021, Trade-offs between bycatch and target catches in static versus dynamic fishery closures](#)

³¹ [Smith et al. 2023, A marine protected area network does not confer community structure resilience to a marine heatwave across coastal ecosystems](#)

³² [Kawade et al. 2025, Climate Change Impacts on Aquatic Ecosystems: Biodiversity Shifts, Ecological Risks and Mitigation Strategies](#)

³³ [Aarts et al. 2019, Top-down pressure on a coastal ecosystem by harbor seals](#)

³⁴ [Tanner and Davis, 2026, The extent and severity of seal-interactions with fisheries in the United Kingdom](#)

This assessment is essential to determine which sectors have borne the greatest adjustments and whether the distribution of constraints remains proportionate and equitable, particularly in light of research indicating imbalances in the focus placed on certain species, regions and activities³⁵.

Sea-Land Connection

The EU MSFD revision needs to consider future needs in term of nutritional sovereignty. EBFA recalls that global population projection by 2050 approaches 9.7 billion, requesting an increase of food production to meet future demands of approximately 60%.³⁶ Additionally, several lines of evidence now indicate that global agricultural extent has peaked with European member states lands being particularly demanded³⁷. The maritime strategy should be considered as an opportunity considering that replacing seafood consumption by livestock would require an additional 4.99 million km² of lands but also because the extinction risks per million tonnes of animal protein produced are 2.6 times higher for agriculture than marine capture fisheries.³⁸ EBFA therefore calls for fisheries to be recognized as a major contributor to food security.

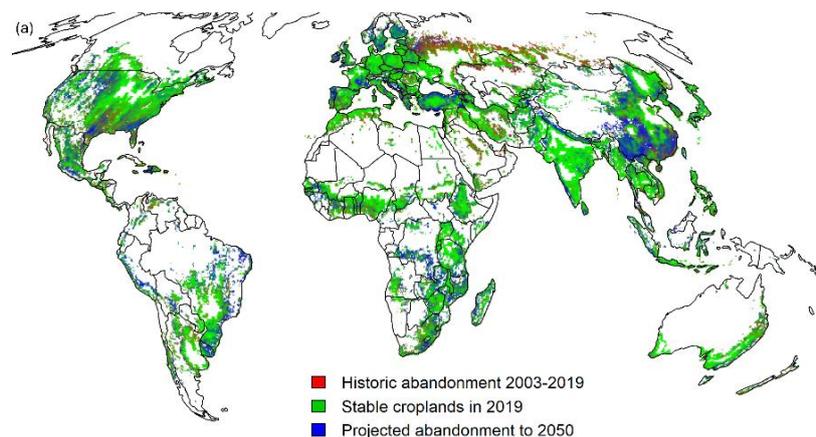


Figure 7. Worldwide agriculture coverage

The revision of the MSFD must more fully integrate the sea–land nexus, particularly the impacts of land-based runoff and pollution on marine ecosystems. Nutrient inputs, chemical contaminants, plastics and sediments originating from agriculture, industry and urban areas significantly affect coastal waters, contributing to eutrophication, habitat degradation and biodiversity loss. These pressures directly undermine the productivity and resilience of marine ecosystems on which sustainable fisheries depend. Addressing marine environmental objectives in isolation from land-based sources would therefore be incomplete. A coherent approach is needed, ensuring stronger alignment between the MSFD and relevant land-based policies (e.g. water, agriculture, tourism and industrial emissions), so that the burden of achieving GES does not fall disproportionately on maritime sectors while key drivers of degradation originate on land.

³⁵ [Newton et al. 2026. Measuring consideration of aquatic ecosystems in national biodiversity conservation planning through text analysis](#)

³⁶ [Zaman, 2025. Harnessing the oceans for global food security](#)

³⁷ [Borrell, 2026. Bending the curve of agricultural expansion offers a new era for biodiversity and climate](#)

³⁸ [Leadbitter et al. 2025. Biodiversity consequences of replacing animal protein from capture fisheries with animal protein from agriculture](#)



4. Integrated Regulatory Framework

Policy coherence remains a major challenge. The MSFD revision must avoid overlapping legislation, objectives, assessments and measures as they create complexity and uncertainty for stakeholders. Particular attention should be given to ensuring clear and coherent articulation with the following legislative instruments.

The CFP is the European Union's set of regulations for managing fisheries and aquaculture, aiming to ensure long-term environmental, economic, and social sustainability. For more than 20 years, the Common Fisheries Policy (CFP) has provided a clear and structured pathway towards sustainability, built on multiannual management plans, the progressive achievement of Maximum Sustainable Yield (MSY), modernised technical measures, strengthened action against illegal, unreported and unregulated (IUU) fishing, and enhanced marine conservation efforts.

These instruments have produced measurable results and contribute directly or indirectly to several MSFD descriptors. However, this contribution remains largely undervalued in the assessment of the achievement of GES, which fuels a sense of disconnection between the objectives set out in the directive and the efforts already made by professionals in the sector.

As established in the NRL (recital 45), *'where the protection of coastal and marine habitats requires that fishing or aquaculture activities be regulated, the common fisheries policy (CFP) applies. In particular, the CFP is to implement the ecosystem-based approach to fisheries management so as to ensure that negative impacts of fishing activities on the marine ecosystem are minimised. That Regulation also provides that the CFP is to endeavour to ensure that aquaculture and fisheries activities avoid degradation of the marine environment.'* EBFA encourages the European Commission to take a similar approach in the design of the future MSFD under the Ocean Act.

In addition, moving towards an ecosystem-based management and the explicit recognition of other effective conservation measures (OECMs) as contributing to the achievement of GES should be a priority of the MSFD revision.

As previously demonstrated, moving towards an ecosystem-based management will not be possible without having a holistic approach considering all maritime uses and their cumulative impacts. Therefore, the MSFD revision will have to carefully complement the Marine Spatial Planning Directive as planned under the Ocean Act.

In addition, Member States rely on extensive networks of spatial protection measures, including Marine Protected Areas (MPA), Special Areas of Conservation (SACs) and Special Protection Areas (SPAs). The most abundant one probably being the site- and species-based Natura 2000 areas established under the Birds and Habitat Directives. To improve consistency between Member States, the revision of the MSFD should help clarifying the implementation processes and government departments responsible to administrate these measures.

Finally, the Nature Restoration Law introduces legally binding targets for the restoration of marine ecosystems that should contribute to improving the Good Environment Status. Close and coherent coordination between the two frameworks will be essential to avoid duplication,



inconsistencies or disproportionate measures, and to ensure that habitat restoration objectives are effectively reconciled with sustainable fishing activities.

The current positive trends observed in MSFD indicators reflect the broader EU regulatory framework outlined above and cannot be attributed solely to the Directive itself or to spatial protection measures alone. It is therefore needed to assess Good Environment Status in light of all policies and measures that effectively contribute to the preservation of species and habitats. EBFA regrets that the progress already achieved is not adequately reflected in the responses to the evaluation and urges the Commission to restore trust by ensuring that public debate presents a balanced narrative, acknowledging both remaining challenges and tangible improvements. This is essential to prevent further declines in seafood consumption and to maintain confidence in sustainable EU fisheries.

5. Governance

EBFA is convinced that the full integration of the Directive under the Ocean Act will also help improving and facilitating its governance. Indeed, it should contribute to breaking down administrative silos between environmental and maritime departments to foster a holistic approach. It should also improve coordination between correspondent technical groups, in particular the Member States Coordination Group (MSCG) and TG SEABED by recognizing the contributions of existing sectoral policies to the environmental objectives pursued by the MSFD. Considering the above, DG MARE involvement should be equivalent to DG ENV. Furthermore, the governance should address the transboundary nature of the sea by involving all the relevant coastal states and reaching a higher regional coordination.

6. Funding

EBFA recalls the prevision of a drastic decrease of 67% of the funding allocated to fisheries and aquaculture in the next MFF 2028-2034. The Commission has consistently highlighted the need to be a leader and model in environment management and marine spatial planning. For fisheries, adequate and predictable financing is a prerequisite for investment in better environmental performance, gear efficiency, decarbonisation, digitalisation, selectivity, data collection, and innovation.

The funding level currently envisaged in the MFF proposal would significantly constrain the sector's ability to respond to these expectations. Therefore, EBFA urges the Commission to review this figure to properly address the ambitions and concerns raised above.

7. Simplification and reduction of administrative burden

In its consultation document, the European Commission explicitly identifies the complexity of the current MSFD implementation framework, the administrative burden on Member States and stakeholders, and the lack of consistency and harmonisation in the assessment of GES. EBFA shares the stated concerns and stresses that the intended simplification must deliver



tangible benefits for fishers and coastal communities, rather than merely shifting administrative complexity from one level to another.

To support the simplification, EBFA encourages:

- Review and simplification of the criteria and methodological standards for GES. Provisions that are scientifically unworkable, methodologically underdeveloped, or impossible to effectively support and implement should be simplified, revised or removed to ensure a framework that is credible, transparent and realistically enforceable.
- Bring ocean-related environmental targets together in one legislative act without introducing new ones.
- Establish a safeguard mechanism whereby the achievement of a target that results in disproportionate social and economic impacts, or that is practically not feasible, shall trigger a review and possible modification, suspension, or postponement of the applicable obligations.
- Simplify, reduce and streamline reporting activities (GES assessment, Monitoring report, Programme of measures, etc.) avoiding data duplication and prioritising data already submitted under fisheries DCF.
- Align the objectives and implementation cycle with other relevant EU legislation, including EU law on nature, water, maritime spatial planning and fisheries.
- Improve data management and analysis in line with the ongoing call for evidence on a European Ocean Observation Initiative, while preserving and respecting the fundamental role played by existing advisory scientific bodies (ICES, STECF).
- Improve coordination between relevant DGs, increase cross-sectoral coordination and promote a more organised sea basin approach.

EBFA reminds that pressure-based indicators, that are presented as easier to track, monitor and enforce, risks reducing the capacity to design balanced solutions reconciling ecological objectives with the socio-economic sustainability of maritime sectors, particularly fisheries and should be carefully assessed and used only if grounded in robust science.

Conclusion

The revision of the Marine Strategy Framework Directive represents a strategic opportunity to improve marine environmental protection while restoring coherence, proportionality and trust within the EU maritime policy framework.

The MSFD must remain a flexible framework Directive, respectful of regional diversity and grounded in robust science. Its implementation should be ecosystem-based, outcome-oriented



and proportionate, avoiding a shift towards rigid quantitative thresholds or pressure-reduction targets that risk creating legal uncertainty and disproportionate socio-economic impacts.

In line with the EESC, EBFA calls for an environmental protection strategy³⁹ that prioritises innovation and technological progress over the elimination of fishing activities, ensures equal consideration of the three pillars of sustainability—environmental, social and economic—and places all maritime sectors on an equal footing. The EU fishing sector has undergone profound structural adjustments over recent decades and has delivered measurable improvements in stock sustainability. These efforts must be recognised and fairly reflected in future policy development.

A credible MSFD revision must therefore:

- Clarify the scope of Good Environment Status by recognizing maritime activities, such as fisheries, as an integrated part of the ecosystem.
- Ensure balanced treatment of all maritime sectors and properly assess cumulative impacts.
- Strengthen policy coherence with MSPD, Natura 2000, Nature Restoration Law and other relevant frameworks by avoiding duplications, contradictions and regulatory overreach.
- Align fisheries-related policy objectives with those established under the Common Fisheries Policy (CFP), by explicitly cross-referencing and ensuring full coherence with its legal framework and targets.
- Secure adequate financial support to enable the improvement of sustainable fisheries.
- Maintain meaningful stakeholder involvement and transparent governance.

By embedding the MSFD within a coherent, holistic and proportionate ocean governance framework, the European Union can reconcile biodiversity protection with sustainable food production, coastal livelihoods and economic vitality.

³⁹ <https://www.eesc.europa.eu/en/our-work/opinions-information-reports/opinions/action-plan-conserve-fisheries-resources-and-protect-marine-ecosystems>