# Position on bottom-trawling in MPAs

Brussels, 28 July 2026

The European Bottom Fishing Alliance (EBFA) supports the EU's ambition to protect and restore marine biodiversity and recognises Marine Protected Areas (MPAs) as an essential conservation tool. However, MPAs are not exclusion zones, and their effectiveness depends on site-specific, science-based measures that are proportionate to clearly defined conservation objectives.

The existing EU legal framework already provides robust mechanisms to assess environmental risks and adopt appropriate fisheries management measures where necessary. Blanket bans on fishing gears including bottom trawling depart from this risk-based approach and risk undermining both conservation outcomes and stakeholder support.

EBFA therefore highlights that:

- **MPAs should be managed on a case-by-case basis**, using the best available scientific evidence and incorporate tailored measures rather than automatic gear bans.
- **Fishers are key in marine conservation**, contributing to the identification, management and monitoring of MPAs, scientific data collection and the development of adaptive management measures.
- **Blanket bans may generate unintended environmental consequences**, leading to fisheries displacement and exporting environmental impacts outside the EU.
- **The EU should accelerate the recognition of Other Effective Area-Based Conservation Measures (OECMs)**, acknowledging the contribution of fisheries management to biodiversity conservation.
- **Continue and adequately fund research into gear modifications** that can reduce and minimise the impact of bottom trawls on the seabed.

## 1. The EU legal framework for MPAs

The EU legal framework governing marine environmental protection as it relates to fisheries has expanded and strengthened considerably over recent decades (Annex 1). It is built upon a complex framework of environmental legislation, regional sea conventions and international biodiversity commitments.

Development of this framework began in 1979, with the Birds Directive, which first introduced the concept of Marine Protected Areas (MPAs) a "*geographically defined area which is designated or regulated and managed to achieve specific conservation objectives*"[1].

[1] Convention on biological diversity 1992

In 2008, the Marine Strategy Framework Directive (MSFD) strengthened this approach by requiring Member States to achieve Good Environmental Status (GES) in their marine waters and recognising MPAs as one of the key tools for delivering healthy and resilient marine ecosystems.

The adoption of the EU Biodiversity Strategy for 2030 marked another important milestone by committing the European Union to protect at least 30% of its seas by 2030, including one-third under strict protection. This ambition was subsequently reinforced at global level through the Kunming-Montreal Global Biodiversity Framework (GBF), adopted at the UN Biodiversity Conference (COP15) in 2022, which established the internationally agreed "30x30" target.

The GBF also introduced the concept of Other Effective Area-Based Conservation Measures (OECMs), recognising that biodiversity conservation can also be achieved outside formally designated protected areas. OECMs acknowledge that sustainably managed areas, including fisheries management measures where they deliver effective long-term conservation outcomes, can make a significant contribution to global biodiversity objectives. The European Union has since begun integrating this concept into its approach to marine conservation.

More recently, the Nature Restoration Regulation, adopted in 2024, reinforced the role of the Natura 2000 network by requiring Member States to prioritise restoration measures within existing protected areas.

Finally, the entry in force in January 2026 of the Agreement under the United Nations Convention on the Law of the Sea on the Conservation and Sustainable Use of Marine Biological Diversity of Areas Beyond National Jurisdiction (BBNJ Agreement) further strengthens the international legal framework for marine conservation. Once implemented, the Agreement will establish procedures for the designation of MPAs and other area-based management tools in areas beyond national jurisdiction, while requiring environmental impact assessments for activities under its scope. Importantly, the BBNJ Agreement is designed to operate in cooperation with, and not undermine, existing global, regional and sectoral bodies, including Regional Fisheries Management Organisations (RFMOs), which remain responsible for the conservation and management of fisheries resources. Its implementation will therefore further complement the already extensive framework governing marine biodiversity protection without replacing the existing science-based fisheries management mechanisms.

Alongside this legislative evolution, a broad ecosystem of governance, management and knowledge-sharing initiatives has also emerged, including the EU blue park community, blue4all, IUCN green list and the European MSP Platform strengthening the implementation and exchange of best practices for marine conservation across Europe.

The evolution of this framework demonstrates that the European Union now possesses a comprehensive framework of legal instruments to protect marine biodiversity through science-based, site-specific and proportionate management measures.

## 2. MPAs - a site-specific conservation tool

MPAs are established to achieve clearly defined conservation objectives, such as protecting vulnerable habitats—including seagrass meadows and coral reefs—or conserving species such as marine mammals and seabirds. They should be used as an adaptive management tool rather

than blunt “no-take areas”, meaning that management measures should be determined according to the conservation objectives of each site and supported by the best available scientific evidence. Their purpose is to ensure that human activities, including fishing where relevant, remain compatible with the favourable conservation status of protected habitats and species through efficient, proportionate and site-specific measures.

At EU level, the principal categories of MPAs are Special Areas of Conservation (SACs) designated under the Habitats Directive and Special Protection Areas (SPAs) designated under the Birds Directive. Beyond these common legal categories, however, Europe has developed a remarkably diverse network of protected areas. For example, combining international, European and National designation, France alone comprise 44 different categories of MPAs (11 national, 9 Polynesian, 15 new Caledonian, 9 international treaties) while Spain has 3 (MPA declared by the Spanish national administration, Natura 2000 both national and regional and marine reserves both national and regional but devoted to fisheries management). Furthermore, at the Mediterranean level, MedPAN has identified 91 different MPA designations.

This diversity reflects an important principle: MPAs are not an objective in themselves but one of several available tools to achieve marine conservation. Before introducing management measures within an MPA or deciding whether an MPA is the most appropriate instrument in the first place, authorities should assess the ecological objectives to be achieved, the pressures affecting the site and the effectiveness of the available management options.

Scientific literature has shown that MPAs are not equally effective for all conservation challenges. Their effectiveness may be limited for highly migratory, wide-ranging[2] or generalist[3] species, for reducing certain forms of bycatch[4], or for addressing pressures driven primarily by climate change[5,6]. Where MPAs are designated or managed without a clear link between conservation objectives, identified pressures and appropriate management measures, they risk becoming so-called "paper parks", protected areas that impose socio-economic costs without delivering the expected biodiversity benefits[7].

EBFA also draws attention to the importance of maintaining an ecosystem-based approach when developing conservation measures. Disproportionate management actions focusing exclusively on charismatic or umbrella species, often located at the top of the food web, may unintentionally disrupt ecosystem balance if broader trophic interactions and ecosystem functioning are not adequately considered. Experience in some sea basins, such as the Baltic Sea, demonstrates the importance of considering predator-prey relationships[8,9].

Ultimately, MPAs should not be regarded as the default solution to every marine conservation challenge. They are one of several complementary instruments available under the EU environmental framework and should be used where they are demonstrably the most effective and proportionate means of achieving specific conservation objectives. Where MPAs are established, their success depends on science-based, site-specific management rather than generic restrictions.

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[2] Mouton et al, 2025, Shortfalls in the protection of Important Shark and Ray Areas undermine shark conservation efforts in Central and South American Pacific
[3] Gutowsky et al, 2026, A half century of monitoring reveals contrasting survival responses of Icelandic seabirds to climate and fisheries pressures
[4] Pons et al, 2021, Trade-offs between bycatch and target catches in static versus dynamic fishery closures
[5] Smith et al, 2023, A marine protected area network does not confer community structure resilience to a marine heatwave across coastal ecosystems
[6] Kawade et al, 2025, Climate Change Impacts on Aquatic Ecosystems: Biodiversity Shifts, Ecological Risks and Mitigation Strategies
[7] Petra et al, 2023, Contribution of area-based fisheries management measures to fisheries sustainability and marine conservation: a global scoping review
[8] Aarts et al, 2019, Top-down pressure on a coastal ecosystem by harbor seals
[9] Tanner and Davis, 2026, The extent and severity of seal-interactions with fisheries in the United Kingdom

## 3. Delivering the 30x30 target: different starting points across Member States

To establish an effective and credible network of MPAs, designation is only the first step. Successful implementation by Member States requires a comprehensive process including the development of national methodologies, collection of scientific data, environmental assessments to identify conservation priorities, impact assessments to determine the pressures affecting protected features, socio-economic assessments to identify proportionate management measures, stakeholder consultation, and the effective implementation, monitoring and enforcement of those measures.

Against this background, achieving the 30x30 target presents very different challenges across Member States. While significant progress has been made in designating MPAs, management remains uneven. Of the 281 Marine Sites of Community Importance (SCIs) designated across the EU, only 119 currently have a management plan. Furthermore, the mapping of marine areas requiring protection remains incomplete, particularly in offshore waters and transboundary ecosystems.

The experience of MPA managers confirms that effective conservation depends on far more than legal designation. According to a MedPAN survey, the three main determinants of successful MPA management are adequate management capacity, an appropriate level of protection, and effective stakeholder cooperation. These depend on a range of practical elements, including clearly defined conservation objectives and indicators, sufficient staffing and equipment, effective governance, scientific monitoring, surveillance and enforcement capacity, sustainable funding, transparent communication and the delivery of tangible socio-economic benefits for coastal communities.

The complexity of these challenges varies considerably between Member States. Differences in governance structures, the diversity of MPA categories and the scale of marine areas to be managed all influence implementation. For example, 1% of France's Exclusive Economic Zone represents approximately 109,000 km², whereas 1% of Slovenia's EEZ corresponds to just 1,67 km². In addition, most European MPAs are in coastal waters, where competing maritime activities make Marine Spatial Planning particularly complex.

The challenge for the European Union is therefore no longer limited to designating additional protected areas. It increasingly lies in ensuring that existing MPAs are effectively managed, adequately funded, scientifically supported and broadly accepted by stakeholders. Strengthening implementation and management effectiveness should remain the priority if MPAs are to deliver measurable biodiversity outcomes.

## 4. OECMs: recognising effective fisheries conservation

While MPAs are an essential instrument for marine conservation, they are not the only mechanism capable of delivering biodiversity outcomes. The GBF explicitly recognises OECMs as complementary tools that can achieve long-term conservation objectives outside formally designated protected areas. The European Union has incorporated this concept into its environmental framework, yet its practical implementation remains limited.

This is particularly relevant in the fisheries sector. European fisheries operate under one of the world's most comprehensive and precautionary management frameworks. As a result, many

marine areas that are not formally designated as MPAs are nevertheless subject to strict spatial management measures designed to protect marine ecosystems. These measures often deliver conservation outcomes equivalent to those expected from protected areas.

Examples include:

- 14% of the NAFO Regulatory Area closed to bottom trawling for VME protection;
- 69% of the GFCM area closed to bottom trawling;
- 97% of the NEAFC Convention Area closed to bottom trawling;
- Approximately 505,000 km² of the SEAFO Convention Area closed to bottom fishing;
- The EU Deep-Sea Access Regulation, prohibiting bottom fishing below 800 metres and in areas between 400 and 800 metres where VMEs occur or are likely to occur;
- Real-time fisheries closures such as those protecting Northern prawn fisheries in the Skagerrak;
- National spatial management measures, including bottom-trawling closures within Ireland's six nautical mile zone, throughout the Azores EEZ, within the Canary Islands EEZ, and in shallow waters of the Cantabrian Sea, Northwest Spain and the Gulf of Cádiz.

These examples demonstrate that effective spatial conservation measures already exist across European fisheries, based on scientific advice, adaptive management and legally binding conservation objectives. They illustrate that biodiversity protection is not exclusively dependent on the designation of MPAs.

Despite the international recognition of OECMs and their integration into the EU biodiversity framework, progress in formally recognising marine OECMs has been extremely limited. According to the World Database on OECMs, while 229 marine OECMs have been reported globally, none have been formally recognised by the European Union or its Member States in EU waters.

**EBFA therefore encourages the European Commission to accelerate the identification and recognition of marine OECMs.** This would acknowledge existing conservation achievements, improve the coherence of the EU's area-based conservation framework and promote an outcome-based approach that recognises effective biodiversity conservation regardless of the regulatory instrument used.

## 5. The consequences of blanket bottom-trawling bans

In recent years, calls for a blanket prohibition of bottom trawling within MPAs have gained increasing political traction and public attention. Reflecting this trend, several Member States have either introduced or announced general restrictions on bottom trawling within their MPAs.

While recognising the importance of ensuring that fishing activities remain compatible with the conservation objectives of protected areas, EBFA considers that automatic gear prohibitions are not consistent with the site-specific, evidence-based approach underpinning the EU environmental framework. Replacing scientific assessments with generic restrictions risks undermining both conservation effectiveness and the balanced implementation of EU legislation.

EBFA considers that blanket bans on bottom trawling may have several unintended consequences:

- **Risking ineffective conservation ("paper parks")**

Sweden, Denmark and Greece have introduced, or announced their intention to introduce, ban on bottom trawling within MPAs. EBFA is concerned that these measures appear to have been developed without first completing the necessary site-specific environmental assessments or engaging adequately with affected stakeholders to determine which measures are required to achieve the conservation objectives of each MPA.

Restrictions adopted without a clear assessment of the protected features, the pressures affecting them and the contribution of each activity to those pressures, risk that the measure selected will not be fit for purpose. A general prohibition on bottom trawling may therefore create the appearance of stronger protection without necessarily addressing the actual causes of environmental degradation. This may reinforce criticism of so-called “paper parks”: areas that are formally protected but whose management measures are poorly connected to their stated conservation objectives.

Blanket bans may also be applied in areas where bottom trawling does not occur and has therefore not been a pressure. In such cases, the prohibition would deliver no additional conservation benefit while potentially creating a misleading public perception that bottom trawling had previously threatened the site.

Management measures should therefore target the activities and pressures demonstrated to affect the protected habitats or species. Applying generic prohibitions unrelated to the ecological conditions of a site risks diverting attention and resources from the measures that are genuinely necessary to achieve its conservation objectives.

- **Weakening stakeholder engagement in MPAs**

The success of MPAs depends not only on legal designation but also on the active engagement of those operating at sea. Fishers are not only users of marine space, in many cases they are key partners in the design, implementation and long-term management of MPAs. Blanket prohibitions that disregard this role risk undermining the trust and cooperation that effective conservation requires.

Across Europe, the fishing sector has actively contributed to marine conservation for decades. In several cases, fishers themselves have been at the origin of proposals for protected areas after identifying ecologically important ecosystems requiring protection. Their practical knowledge of the marine environment has frequently complemented scientific assessments and improved management decisions.

Fishers also participate directly in the establishment and management of MPAs. Through collaborative initiatives such as the LIFE DREAM[10] and LIFE SEA.NET[11] projects, fisheries organisations have worked alongside scientists, conservation organisations and public authorities to identify conservation priorities, collect scientific evidence and design appropriate

[10] https://www.life-dream.eu/
[11] https://lifeseanet.eu/

management measures. In several Member States, fisheries organisations are also directly involved in the governance and day-to-day management of protected areas.

A good example is the French methodology for assessing the risks of degradation of habitats and species by professional fishing activities in Natura 2000 marine sites, developed jointly by the French Ministry responsible for Fisheries, the National Museum of Natural History (MNHN), the French Biodiversity Office (OFB), Ifremer and representatives of the fishing sector (Annexe 2). Rather than imposing generic restrictions, this methodology evaluates the interaction between specific fishing gears and protected habitats, assesses the actual level of risk, and only where necessary develops proportionate management measures through consultation with fishing professionals. This demonstrates that evidence-based, site-specific management can reconcile fisheries with conservation objectives while ensuring compliance with the Habitats Directive, as illustrated in the recent judgement of the General Court[12].

Weakening fishers' confidence in the MPA process through indiscriminate prohibitions would risk reducing participation in scientific programmes, collaborative governance and voluntary conservation initiatives. In the long term, this could undermine both the effectiveness and the social acceptance of MPAs, as seen in the case of two SACs in Ireland[13].

- **Generating unintended environmental consequences**

Marine ecosystems are complex, and all fishing gears present different environmental characteristics, advantages and limitations depending on the species targeted, the habitat concerned and the way they are operated. Effective marine conservation should therefore focus on achieving conservation objectives through evidence-based, site-specific management rather than assuming that a specific fishing method is inherently incompatible with all MPAs.

Bottom trawling itself has evolved considerably over recent decades through continuous technological innovation aimed at improving selectivity, reducing environmental interactions and increasing operational efficiency. These developments include:

- The optimisation of fishing operations through control of towing speed and duration (doppler logs);
- Adjustments to gear dimensions and design to reduce drag;
- Adapting pelagic trawl gear to target demersal species;
- Innovations in mesh size and orientation (square and diamond) and selectivity devices (sorting grids and square mesh panels) to improve selectivity;
- Novel trawl footrope configurations and trawl doors that minimise bottom contact;
- Underwater cameras, gear sensors and innovative echo sunders that better discriminate habitat type.

EBFA cautions against regulating fishing activities solely based on gear type. The diversity of fishing methods used across European fisheries - including demersal and pelagic gears, passive and active gears, and coastal and offshore - allows fishing effort to be distributed across different ecosystems and target species. Maintaining a diverse fishing sector contributes to more resilient fisheries and provides managers with greater flexibility to achieve conservation objectives while limiting unintended ecological and socio-economic consequences.

[12] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=OJ:C_202603837
[13] https://kfo.ie/minister-remains-silent-on-sacs/

Blanket prohibitions on bottom trawling in MPAs where the activity has historically coexisted with conservation objectives are also likely to generate fisheries displacement rather than environmental gains. Fishing effort does not simply disappear; it is redirected towards adjacent fishing grounds, potentially concentrating pressure on habitats and ecosystems that may be equally or even more sensitive. Such displacement may also increase steaming distances, fuel consumption and greenhouse gas emissions, while create congestion and increase interactions between different fishing fleets.

Furthermore, bottom trawling supplies a wide range of species that are an integral part of the European seafood market. The European Union already imports more than 70% of the seafood it consumes. Restricting access to productive fishing grounds without a case-by-case scientific justification would further reduce domestic production, increase dependence on imports and potentially export environmental impacts and greenhouse gas emissions to third countries operating under less stringent environmental, labour and fisheries management standards. Some species commonly available to European consumers would become increasingly reliant on imports or disappear from the EU market altogether.

Rather than promoting blanket gear bans, EBFA supports management measures that are proportionate, evidence-based and tailored to the conservation objectives of each protected area. This approach is more likely to deliver tangible biodiversity benefits while avoiding the unintended environmental consequences associated with effort displacement and carbon leakage.

- **Undermining the EU legal framework**

As previously indicated the legislative framework surrounding fisheries and MPAs evolved by taking a strong, strict and precautious environmental perspective. EBFA is concerned that this framework is increasingly being challenged by calls for automatic prohibitions on specific fishing gears, irrespective of the site-specific assessments required under EU law.

In recent years, environmental litigation has become an increasingly prominent instrument for influencing fisheries management, with legal actions often seeking the systematic phase-out of bottom trawling from MPAs rather than the implementation of the case-by-case assessment process established by the European legislative framework.

This trend may intensify following the recent coalition of environmental organisations advocating for EU-wide bans on bottom trawling within MPAs[14].

EBFA also expresses serious concern regarding unlawful direct actions carried out by activist organisations against fishing vessels[15,16,17]. Such actions not only interfere with lawful fishing activities but may also endanger the safety of fishers at sea. Respect for the rule of law, public authorities and established legal procedures remains essential to ensuring both effective environmental protection and safe maritime operations.

[14] Undercurrentnews, 2026, New coalition forms to defend EU marine protection in courts
[15] The Guardian, 2022, UK drops 'absurd' case against Greenpeace for dropping rocks in sea
[16] Le Marin, 2026, Action anti-chalutage : l'État ne peut pas porter plainte contre Greenpeace, les rochers resteront au fond de l'eau
[17] Visserij.NL, 2026, Greenpeace wants to dump stones in British waters again

Importantly, the experience gained during the implementation of the environmental framework demonstrates that the existing EU approach can deliver balanced conservation outcomes. Across several Member States, scientific assessments and stakeholder dialogue have resulted in management measures tailored to the specific ecological characteristics of each site, allowing conservation objectives to be achieved while maintaining sustainable fishing activities where appropriate.

For example:

- In Portugal, the assessment of marine Natura 2000 sites concluded that none had seabed conservation objectives requiring restrictions on bottom trawling.
- In Sweden, despite the introduction of a general prohibition on bottom trawling within MPAs from 1 July 2026, the Swedish Agency for Marine and Water Management authorised an exemption for the shrimp fishery in Kosterfjorden–Väderöfjorden. The exemption is subject to strict environmental safeguards, including mandatory training on the protected area's conservation objectives, the use of selective trawls to minimise bycatch and continuous vessel monitoring through AIS.
- In France, the Marine Natural Park of Iroise and the Baie de Seine occidentale, where bottom trawling continues under site-specific management measures, have both been recognised under the IUCN MPA Green List, demonstrating that sustainable bottom-contact fisheries and effective protected area management can successfully coexist.

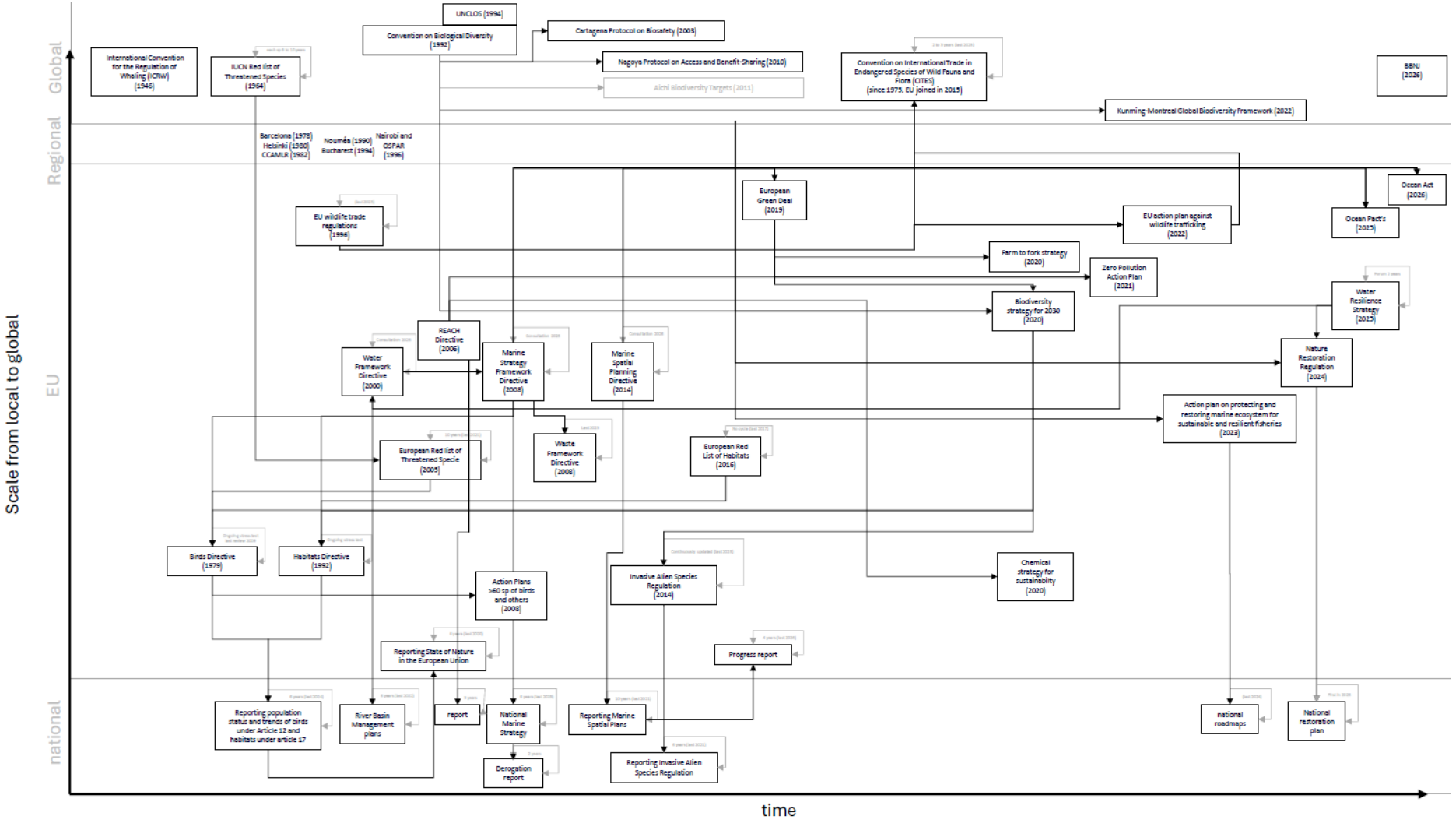
These examples illustrate that the current EU framework can deliver conservation results through science-based, site-specific and proportionate management, without resorting to automatic prohibitions. The existing legal framework already provides mechanisms to restrict or prohibit fishing activities whenever scientific evidence demonstrates that this is required. Replacing this risk-based approach with blanket gear bans would not strengthen implementation of EU environmental law, simply fundamentally depart from it.

## 2. Conclusions

EBFA therefore recommends that the European Commission:

- Adopt a joint area-based conservation Directive by merging the Birds and Habitats directives;
- Promote and secure its legal framework to ensure that fisheries restrictions are adopted only following appropriate scientific and socio-economic assessments;
- Recognise and encourage fisheries as partners in MPA governance and implementation;
- Accelerate the recognition of OECMs as a complementary conservation tool;
- Avoid blanket gear prohibitions that risk generating fisheries displacement, carbon leakage and increased dependence on seafood imports.

## Annexe 1: Environmental Framework applying to EU fisheries



**Annexe 2: French method for analyzing the risks of degradation of habitats/species by professional fishing activities in Natura 2000 sites at sea**

*Application of the article 6 § 3 of Council Directive 92/43/EEC on conservation of natural habitats and of wild fauna and flora ("Nature" Directive)*

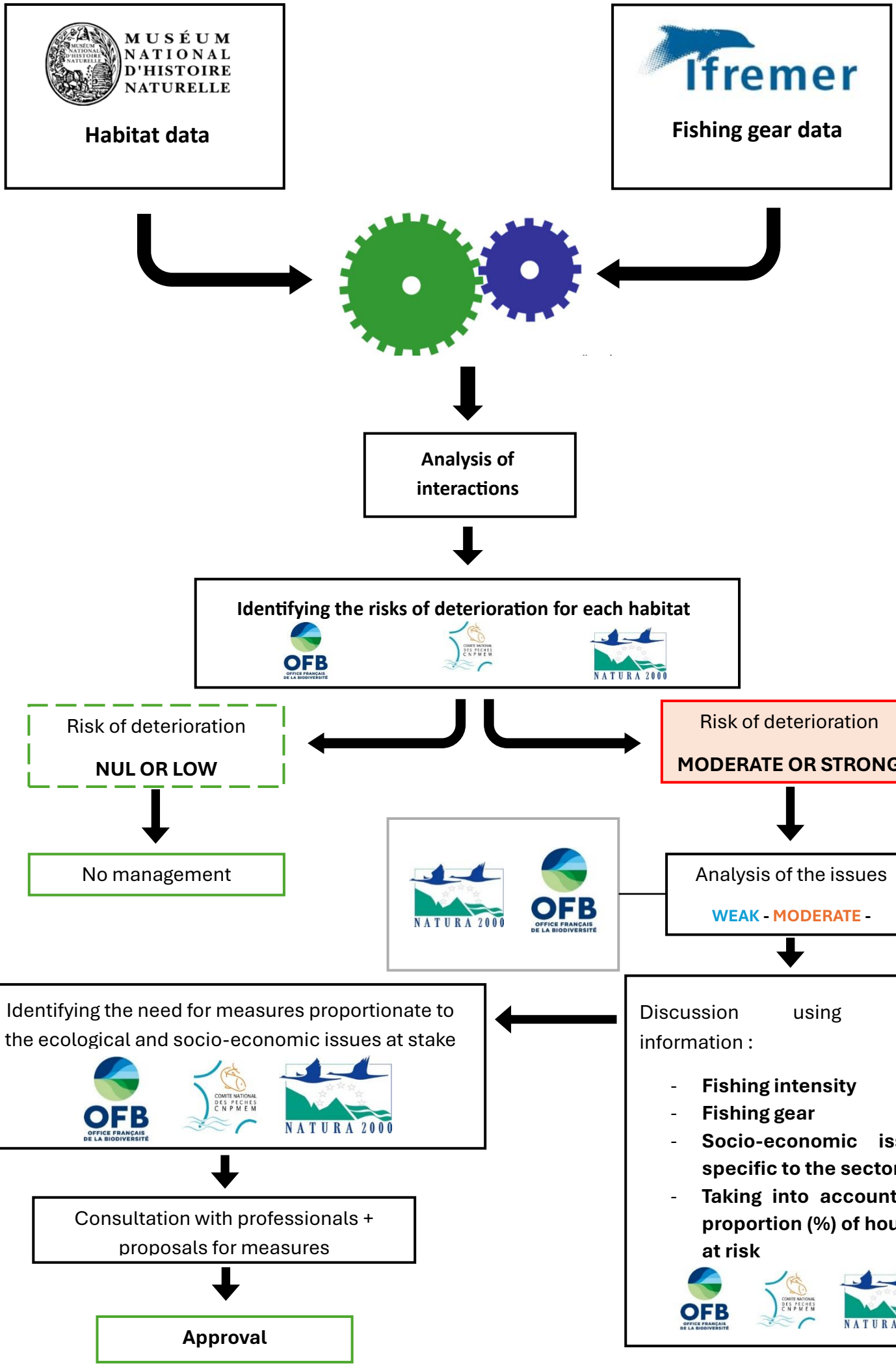
Analyses of the risks of degradation of habitats/species by fishing activities in Natura 2000 sites were developed in 2012 in France as part of a partnership between the **French Ministry responsible for fisheries, the National Museum of Natural History (MNHN), the French Biodiversity Office (OFB) and fishing professionals' bodies representatives.**

The aim is to **assess the risks of degradation posed by fishing activities**. These analyses are in line with the assessment of the impact of activities carried out in Natura 2000 sites at sea, as required by the European Birds (2009/147/EC) and Habitats (92/43/EEC) Directives. These analyses are carried out when Natura 2000 site objective documents are drawn up or revised, and **ensure that fishing activities remain compatible with the conservation objectives of Natura 2000 sites,** defined on a case-by-case basis.

Two methodologies have been put in place: one dedicated to **habitats** and the other to **species.**

Matrices on the intensity of the impact of fishing gear on natural habitats of Community interest have been produced by the French scientific institute Ifremer and the MNHN, making it possible to adapt any management measure to the **sensitivity of habitats to fishing gear (habitats/pressures)**, and **the exposure of habitats to fishing gear (gear/pressures),** with the aim of assessing the physical pressures of fishing gear in the marine environment (type of substrate of the benthic habitats considered) according to their nature and design.

Following these risk analyses, **regulatory measures can be adopted** for fishing activities, **adapted to the conservation objectives of each Natura 2000 site.**


MUSÉUM NATIONAL D'HISTOIRE NATURELLE
Habitat data
Ifremer
Fishing gear data
Analysis of interactions
Identifying the risks of deterioration for each habitat
OFB
NATURA 2000
Risk of deterioration
NUL OR LOW
Risk of deterioration
MODERATE OR STRONG
No management
NATURA 2000
OFB
Analysis of the issues
WEAK - MODERATE -
Identifying the need for measures proportionate to the ecological and socio-economic issues at stake
OFB
NATURA 2000
Discussion using local information :
- Fishing intensity
- Fishing gear
- Socio-economic issues specific to the sector
- Taking into account the proportion (%) of housing at risk
OFB
NATURA 2000
Consultation with professionals + proposals for measures
Approval