

MARINE STRATEGY FRAMEWORK DIRECTIVE

CCB POSITION PAPER

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The Marine Strategy Framework Directive (MSFD) is a crucial directive when it comes to protecting marine biodiversity and ocean health. Under this directive, the central goal is to reach “Good Environmental Status” (GES), measured across 11 descriptors that reflect different facets of ecosystem health. As the Baltic Sea is under mounting pressure from stressors like eutrophication, overfishing, hazardous substances, and climate change, the ongoing revision of the MSFD is both an urgent and critical opportunity to improve the state of the Baltic Sea.

The revised directive must continue to keep the achievement of GES as its central goal and, in addition, be more enforceable, measurable, and implementable, with sufficient funding and political will to carry out the necessary measures. We recommend the following in order to achieve the overall GES goal:

- **Set legally binding threshold values for all descriptors.** Make all existing and forthcoming threshold values (TVs) for MSFD descriptors and relevant criteria legally binding within the main directive. In cases where descriptors and their criteria still lack threshold values, the directive must specify a binding deadline for their establishment and implementation, identify the responsible authority (EU or regional), and define the consequences of non-compliance or failure to reach agreement and implementation in time.
- **Establish time-bound, mandatory pressure reduction targets.** The revised directive should include legally binding pressure reduction targets addressing key pressures that hinder the achievement of GES, both overall and per descriptor wherever relevant.¹ Including these obligatory and time-bound pressure reduction targets would significantly support making the revised directive more implementable and enforceable.

- **Set a new deadline to reach GES throughout Europe's sea basins by 2034, aligned with the MSFD implementation cycle.** GES should have been reached by 2020, and all efforts must still be made to achieve it as fast as possible. However, in order to operationalise the implementation and enforcement of the directive, establishing a new, credible, yet ambitious deadline is recommended. A new GES deadline for 2034 allows for two full reporting cycles to be completed (2022-2028 and 2028-2034), which gives Member States time to implement the necessary measures whilst keeping a realistic and ambitious schedule. Additionally, intermediate milestones could be introduced in the revised MSFD, that could steer implementation towards continuous progress in achieving and/or maintaining GES.
- **Increase ambition and specificity for national Programmes of Measures.** National Programmes of Measures (PoMs) are a cornerstone of the MSFD. However, Member States currently have considerable flexibility when it comes to designing their PoMs, which has often led to insufficient ambition and high variability between neighbouring countries and across regions. National PoMs in the revised directive must have a high level of ambition, contain concrete and implementable measures, and ensure regional coordination. This can be achieved by, for example, including the time-bound pressure reduction targets in the PoMs together with measures to implement the legally binding TVs.
- **Restrict Article 14 exemptions.** Article 14 in the MSFD outlines the acceptable exceptions for when reaching GES is not possible. However, in practice, this provision is too permissive, since the potential exemptions are too broad in scope. The article should be revised so that Member States cannot invoke it to justify inaction but are required to demonstrate that all feasible measures within their national jurisdiction and have made genuine efforts to advance solutions regionally through cooperation with other Member States before any exemptions can be sought.
- **MSFD requirements must feed into Maritime Spatial Plans²:** National maritime spatial plans (MSPs) need to make achieving GES a cornerstone and incorporate into their planning MSFD threshold values and pressure reduction targets, thus functioning as a binding environmental framework within which maritime spatial plans are drawn up, not as one set of considerations alongside economic and other interests. This will ensure coherence between the implementation and planning cycles of the two directives, **whilst keeping them as two separate directives.**
- **Ease the reporting burden** by aligning MSFD reporting with the reporting obligations in the WFD's six-year cycle, as long as this does not delay the achievement of GES.

BALTIC SEA PRIORITIES

In addition to the overarching recommendations above, the following Baltic Sea-specific priorities must be accounted for in the revised directive and its implementation, keeping in mind that the Baltic Sea is in a particularly critical condition, subject to multiple and intensifying pressures that demand urgent, targeted measures:

Fisheries and aquaculture are among the major pressures affecting the Baltic Sea ecosystem³ and must therefore be addressed in order to reach GES. This requires coherence with the CFP. Setting and implementing binding TVs for descriptors and their criteria related to fisheries (including D1 and D3) and aquaculture would not only support progress toward GES but also advance the CFP objectives, including **rebuilding fish stocks and ending overfishing** (Art.2.2⁴), **implementing ecosystem-based fisheries management and reducing the impact on marine ecosystems** (Art 2.3⁵). Fisheries management must be more ambitious in aiming to achieve GES, particularly with regard to food webs (D4), seabed integrity (D6) and marine litter (D10).

Nutrient runoff, primarily from agriculture, remains the dominant pressure driving severe **eutrophication** in the Baltic Sea. **Accordingly, coherence and synergies between the MSFD and the Water Framework Directive (WFD), the Common Agricultural Policy (CAP), and the EU Zero Pollution Action Plan is important to identify and utilise.** Both passive and active restoration in rivers, waterways, marine areas, as well as on land are needed. Adopting a source-to-sea approach⁶ that integrates land-based and coastal restoration efforts, is crucial to achieve Baltic Sea ecosystem recovery. Full implementation of the MSFD, particularly D5 and D6, will help restore the Baltic Sea and curb the effects of eutrophication.

The Baltic Sea is warming faster than most other marine regions and **climate change must be factored in when setting pressure reduction targets and threshold values**, with the precautionary principle used in cases where effects cannot be reliably measured or predicted. **Furthermore, the effects of climate change must not be used by Member States as grounds for claiming exemptions to achieving GES under Art. 14.**

Regional Seas Conventions (RSCs), and HELCOM in particular for the Baltic Sea, should be given a **clear mandate to work on MSFD implementation within their existing remit in the revised directive**. The RSCs play an important role in improving regional coherence, coordination and effectiveness of MSFD implementation, monitoring, as well as in assessment of GES. It is also important that efforts are made to support coherence between the national PoMs and the actions in the HELCOM Baltic Sea Action Plan.

Lastly, the achievement of GES and the full implementation of the MSFD require coherent implementation across multiple pieces of EU legislation. The forthcoming Ocean Act,⁷ building on the revision of the Maritime Spatial Planning Directive (MSPD), must be aligned with the MSFD goals and make achieving GES a cornerstone of the Act. It is also crucial that, in addition to making the revised MSFD simpler and more efficient to implement and enforce, this must be accompanied by political will and a high level of ambition among Member States. The poor state of the Baltic Sea ecosystems and EU seas demands the rapid implementation of ambitious measures to turn the tide and to finally achieve GES.

¹ Pressure reduction targets refer to specific goals aimed at lowering human-induced stressors on marine ecosystems. Examples could be to reduce cetacean bycatch mortality by x% by a certain year (for D1), and for D6 it could for example be that each year the extent of seabed that is disturbed, by e.g. bottom trawling, is reduced by x %.

² The 2024 [Blue Manifesto](#), which is co-signed by over 140 NGOs, underscores the need for overarching policy coherence, in which the Marine Strategy Framework Directive (MSFD) and the Maritime Spatial Planning Directive (MSPD) play a central role.

³ ICES [Baltic Sea ecosystem overview](#) 2024.

⁴ CFP Art 2.2. "The CFP shall apply the precautionary approach to fisheries management, and shall aim to ensure that exploitation of living marine biological resources restores and maintains populations of harvested species above levels which can produce the maximum sustainable yield.

In order to reach the objective of progressively restoring and maintaining populations of fish stocks above biomass levels capable of producing maximum sustainable yield, the maximum sustainable yield exploitation rate shall be achieved by 2015 where possible and, on a progressive, incremental basis at the latest by 2020 for all stocks."

⁵ CFP Art 2.3 "The CFP shall implement the ecosystem-based approach to fisheries management so as to ensure that negative impacts of fishing activities on the marine ecosystem are minimised, and shall endeavour to ensure that aquaculture and fisheries activities avoid the degradation of the marine environment."

⁶ See [Guiding Recommendations for Source-to-Sea Restoration](#) in Riverine, Coastal, and Marine Ecosystems (CCB, 2025).

⁷ CCB [submission](#) for Ocean Act Call for evidence.

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