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Background

The European Commission's legislative proposals for the revised Marine Strategy Framework Directive (MSFD) and the new Ocean Act are expected to be published in late 2026 or early 2027. It is clear to Coalition Clean Baltic (CCB) that the MSFD and the forthcoming Ocean Act, which builds on the revision of the Maritime Spatial Planning Directive, are key marine policy instruments that must be implemented in harmony, with the achievement of Good Environmental Status (GES) as a cornerstone for both.

CCB has put together a position paper on the MSFD outlining several key asks to strengthen its implementation and accelerate progress towards GES. CCB emphasises that the revised directive must continue to have 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.

In summer 2026, CCB also submitted a response to the European Commission's public consultation on the European Ocean Act. The in-depth paper developed as part of the consultation response outlines CCB's key asks to incorporate into the Ocean Act in order to make it successful, especially from a Baltic Sea perspective.

As the Baltic Sea is under mounting pressure from stressors such as eutrophication, overfishing, hazardous substances, and climate change, the ongoing revision of the MSFD and the development of the Ocean Act are both urgent and critical opportunities to improve the state of the Baltic Sea.

Action requested

The Session is invited to:

- note and comment on the asks made by CCB in the position paper on the MSFD as well as the in-depth paper for the Ocean Act;
- discuss how the group envisions the MSFD revision process and new Ocean Act to influence the Work Plan actions of WG GEAR as well as the collaboration across different HELCOM Working Groups.

Coalition Clean Baltic's position paper on the Marine Strategy Framework Directive

JUNE 2026

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 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 Plans:**[2] National maritime spatial plans (MSPs) need to make achieving GES a cornerstone and incorporate into their planning MSFD threshold

[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.

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 still 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 ecosystem[3] 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.2.2[4])**, implementing ecosystem-based fisheries management and reducing the impact on marine ecosystems** (Art 2.3[5]). 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 approach[6] 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, 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.

[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).

We support the Ocean Act objectives for improving coherence, coordination and effectiveness of EU ocean governance. However, we emphasize that the Act must deliver truly ecosystem-based management and that reaching Good Environmental Status (GES), as defined in the Marine Strategy Framework Directive (MSFD), should be established as a cornerstone of the Act.

The Ocean Act should ensure that all ocean-related policies are fully aligned with, and actively contribute to, the achievement of EU environmental objectives, making the protection and restoration of marine ecosystems a fundamental pillar of sustainable ocean governance.

Priorities for the Baltic Sea

We underline the importance of acknowledging and addressing regional challenges, particularly the severe effects of eutrophication caused by nutrient inputs from land-based sources, as well as hazardous substances in the Baltic Sea. Climate change must also be accounted for when managing the sea area and its resources, given that it is significantly affecting the Baltic Sea. Furthermore, the poor state of the ecosystem and Baltic Sea fish stocks must be tackled by treating fisheries and aquaculture as pressures in national and regional Maritime Spatial Plans (MSPs), and these activities must be planned for in a way that reduces their impact on the ecosystem and the species within it. Habitat degradation is a key challenge in the Baltic Sea, and the protection and restoration of marine habitats are essential for rebuilding ecosystem resilience, supporting biodiversity, and securing the long-term sustainability of fisheries and other blue economy sectors. Habitat degradation in the Baltic Sea is linked to multiple cumulative pressures rather than a single cause. In this regard, it is highly important to consider the cumulative impact of all the human-induced pressures on the marine ecosystem. This will necessitate strong cross-border and sea-basin coordination.

We recommend the following:

- **Ensure that the MSPD/Ocean Act fulfils the goals of the MSFD.** Reaching Good Environmental Status (GES) should be a cornerstone of the Ocean Act/revision of the Maritime Spatial Planning Directive (MSPD). National maritime spatial plans should make achieving GES the basis of their planning and incorporate MSFD measures, such as threshold values and pressure reduction targets,[7] where relevant, to ensure coherence between implementation of the two directives, whilst keeping them as two separate directives.
- **Include MPAs and restoration areas in the Ocean Act**. Current and future Marine Protected Areas (MPAs) and restoration areas need to be identified and considered when planning human activities at sea and should therefore be included in the Maritime Spatial Plans (MSPs). This is especially important to reach Favourable Conservation Status of habitats and species as well as to support targets for 30% effectively protected areas nationally of which at least a third is strictly protected and targets for restoration areas - such provisions outlined under the Birds and Habitats Directives, the EU Biodiversity Strategy and the Nature Restoration Regulation respectively. Full coherence with the MSFD (GES and ecosystem-based approach) as well as other environmental legislation and policies (including the Birds and Habitats Directives, the Marine Action Plan, EU Biodiversity Strategy, the NRR, and the Common Fisheries Policy) is needed to reach all the different conservation and protection targets. A Strategic Environmental Assessment (SEA) and Cumulative Impact Assessment of the MSPs should be carried out to ensure their compatibility with and contribution to achieving GES and other regional, EU and global conservation goals.
- **Ensure integration of an ecosystem-based approach[8] into the MSP.** As noted in HELCOM's recently updated guidelines for EBA integration in MSP for the Baltic Sea area: *"MSP applying an ecosystem-*

[7] *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%.

[8] The ecosystem-based approach is one of four key principles that were suggested as a basis for actions in the Commissions European Ocean Pact: "*a source-to-sea approach on tackling pollution; a precautionary principle; a science-based approach to policy decisions; and an ecosystems-based approach"* EOP, p.6. Further, application of an ecosystem-based approach is listed as an objective of maritime spatial planning (Directive 2014/89/EU, Art 5.1): "*When*

based approach is essential for sustainable use and preservation of ecosystem functioning, aiming to reach good environmental status (GES)".[9]

- **Include fisheries and aquaculture in national and regional MSPs to reduce their impact on habitats and species.**[10] As a first step, data on fisheries, such as extent and gear type, and aquaculture must be included as a planning and pressure layer for national and regional MSPs. This would enable planners to suggest evidence-based zoning areas where fisheries and/or aquaculture could be restricted to support achieving GES and threshold values such as the ones for D6 on seabed integrity.
- **Align the Ocean Act with the goals and objectives of the Common Fisheries Policy (CFP).** To reverse the continuous poor status and decline of many fish populations, the Act must support the CFP's objectives on protecting and rebuilding fish populations.[11] National MSPs could, for example, map and include important areas for fish population recovery, such as spawning, nursery and migration areas,[12] as the degradation of marine habitats is not only an environmental issue but also affects food-web functioning, fish stock productivity, and long-term fishing opportunities.
- **Strengthen land-sea interface requirements in the MSPD** to prevent land-based activities from harming marine ecosystems.[13],[14] National MSPs could, for example, map and address hotspots for nutrient runoff,[15] including maritime activities that lead to nutrient input into the Baltic Sea and aquaculture. Furthermore, a Source-to-Sea approach should be adopted for land-based, coastal and marine restoration when planning (this is particularly urgent for the Baltic Sea given its eutrophication and pollution challenges). As many of the pressures affecting marine ecosystems originate on land, integrated governance responses and collaboration between the MSP and land-based planning processes are needed.
- **Strengthen the role of the Regional Sea Conventions (RSCs) in implementing the Ocean Act and EU marine legislation.**[16,17] This can, for example, be done via the establishment of regional MSPs and by increasing the RSCs' capacities and mandates, within their existing remit, for both the MSPD and the MSFD. At minimum, national MSPs should be collated into a regional overview per sea basin, evolving over time into full regional maritime spatial planning, to, for instance, enable cumulative impact assessments. Collaboration between RSCs should also be strengthened at EU level to share knowledge and build joint capacity. RSCs could coordinate and establish platforms to promote or try to enable better collaboration between Member States and enable early exchange of information to try to align planning and reporting processes.

establishing and implementing maritime spatial planning, Member States shall consider economic, social and environmental aspects to support sustainable development and growth in the maritime sector, applying an ecosystem-based approach, and to promote the coexistence of relevant activities and uses."

[9] Revised Guideline for the implementation of ecosystem-based approach in maritime spatial planning (MSP) in the Baltic Sea area. HELCOM (2026) Link

[10] MSP Objectives, Directive 2014/89/EU, Art 5.2: "*Through their maritime spatial plans, Member States shall aim to contribute to the sustainable development of energy sectors at sea, of maritime transport, and of the fisheries and aquaculture sectors, and to the preservation, protection and improvement of the environment, including resilience to climate change impacts. In addition, Member States may pursue other objectives such as the promotion of sustainable tourism and the sustainable extraction of raw materials.*"

[11] 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.*"

[12] Art 8 of CFP: "*The Union shall, while taking due account of existing conservation areas, endeavour to establish protected areas due to their biological sensitivity, including areas where there is clear evidence of heavy concentrations of fish below minimum conservation reference size and of spawning grounds. In such areas fishing activities may be restricted or prohibited in order to contribute to the conservation of living aquatic resources and marine ecosystems. The Union shall continue to give additional protection to existing biologically sensitive areas.*"

[13] The MSP directive (*Directive 2014/89/EU of the European parliament and of the council of 23 July 2014 establishing a maritime planning framework*) highlights that "*in order to promote the sustainable use of maritime space, maritime spatial planning should take into account land-sea interactions*" and that "*Maritime spatial planning should aim to integrate the maritime dimension of some coastal uses or activities and their impacts and ultimately allow an integrated and strategic vision*".

[14] As stated in the objectives of the MSP directive Art 5.1, Member States must "*consider economic, social and environmental aspects to support sustainable development and growth in the maritime sector, applying an ecosystem based approach, and to promote the coexistence of relevant activities and uses*" when maritime spatial planning is established and implemented.

[15] During discussions at the HELCOM-VASAB Maritime Spatial Planning Working Group meeting 8-2026 it was noted that "*under HELCOM work strands there is decades of tradition in tracking nutrient inputs from the catchment of the Baltic Sea from over 300 river catchments and point sources, with accurate spatial information e.g. on major river mouths and aquaculture with their precise nutrient inputs, and that the new criteria for dedicating HELCOM hot spots include a category for sea-based hot spots."*

[16] Art 11 of MSP "*1. As part of the planning and management process, Member States bordering marine waters shall cooperate with the aim of ensuring that maritime spatial plans are coherent and coordinated across the marine region concerned. Such cooperation shall take into account, in particular, issues of a transnational nature.*" And "*2. The cooperation referred to in paragraph 1 shall be pursued through: (a) existing regional institutional cooperation structures such as Regional Sea Conventions; and/or (b) networks or structures of Member States' competent authorities; and/or (c) any other method that meets the requirements of paragraph 1, for example in the context of sea-basin strategies.*"

[17] Art 197 of the United Nations Convention on the Law of the Sea, "*States shall cooperate on a global basis and, as appropriate, on a regional basis, directly or through competent international organizations, in formulating and elaborating international rules, standards and recommended practices and procedures consistent with this Convention, for the protection and preservation of the marine environment, taking into account characteristic regional features.*"

Links to supplemental documents supporting our positions:

- Guiding Recommendations for Source-to-Sea Restoration in Riverine, Coastal, and Marine Ecosystems (Coalition Clean Baltic, 2025)
- Position Paper on Marine Protected Areas (Coalition Clean Baltic, 2024)
- Don't sink the Common Fisheries Policy – fulfil its potential (joint NGO Briefing, 2025)
- Blue Manifesto (joint NGO paper, 2024)