

## **CCB full submission European Ocean Act, Public consultation, July 2026**

**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<sup>1</sup>, 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

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<sup>1</sup> *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 %.

when planning human activities at sea and should therefore be included in the Maritime Spatial Plans (MSPs). This is especially important to reach the goal of a minimum of 30 % effectively protected areas nationally of which at least a third is strictly protected (EU Biodiversity Strategy) as well as the targets for restoration areas outlined in the Nature Restoration Regulation (NRR). 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<sup>2</sup> 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-based approach is essential for sustainable use and preservation of ecosystem functioning, aiming to reach good environmental status (GES)".*<sup>3</sup>
- **Include fisheries and aquaculture in national and regional MSPs to reduce their impact on habitats and species.**<sup>4</sup> 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.<sup>5</sup> National MSPs could, for example, map and include important areas for fish population recovery, such as spawning, nursery and migration areas,<sup>6</sup> 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.

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<sup>2</sup> 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 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."*

<sup>3</sup> Revised Guideline for the implementation of ecosystem-based approach in maritime spatial planning (MSP) in the Baltic Sea area. HELCOM (2026) [Link](#)

<sup>4</sup> 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."*

<sup>5</sup> 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."*

<sup>6</sup> 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."*

- **Strengthen land-sea interface requirements in the MSPD** to prevent land-based activities from harming marine ecosystems.<sup>7,8</sup> National MSPs could, for example, map and address hotspots for nutrient runoff,<sup>9</sup> 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.**<sup>10,11</sup> 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.

*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)

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<sup>7</sup> 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".

<sup>8</sup> 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.

<sup>9</sup> 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."

<sup>10</sup> 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."

<sup>11</sup> 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."