

MEDAC Advice on the Call for evidence on the Revision of the Marine Strategy Framework Directive (MSFD)

Context

The Mediterranean Advisory Council (MEDAC) welcomes the opportunity to contribute to the ongoing revision of the Marine Strategy Framework Directive (MSFD), following the European Commission's launch of a public consultation on 16 December 2025¹, which highlighted the need to strengthen marine environmental protection, simplify implementation, and reduce administrative burden. The Commission's Evaluation presented in 2025² emphasised persistent challenges in MSFD implementation, including gaps in Good Environmental Status (GES) assessment, need for clearer threshold values and aggregation rules for biodiversity descriptors, need to simplify reporting requirements under some articles, limited interoperability with fisheries and maritime policies and data fragmentation across sea basins. Obstacles for an integrated approach for Programme of Measures under the MSFD and the implementation of these measures, included 1) uncertainty about cumulative pressures that defines GES at national level, 2) the sectoral approach of decision making and related difference in political and socio-economic priorities, 3) the resulting need of policy coordination at different levels, and 4) ensuring a fair, transparent, and integrated involvement of all stakeholders³. There is a substantial capacity need to coordinate a cross-sectoral approach between fisheries and environmental departments^{4,5}.

MEDAC would like to emphasize that the revision of the MSFD represents an opportunity to better monitor and address the impacts of human activities beyond fishing on commercial fish species as well as on other fisheries-relevant biodiversity that provides key ecosystem, economic and cultural services, including in the context of climate change for the fisheries sector. At the same time, the revision should ensure both fisheries-dependent and fisheries-independent monitoring and provide greater clarity and direction for Member States to ensure achieving GES.

General Principles relevant for this advice:

- **Strengthen science-based and regionally proportionate measures:**

¹ https://environment.ec.europa.eu/news/commission-launches-consultation-marine-protection-rules-2025-12-16_en

² https://environment.ec.europa.eu/document/557d77b9-06d8-42a6-8a1f-c6a2e76da148_en

³ Raicevich et al. (2017) Critical Inconsistencies in Early Implementations of the Marine Strategy Framework Directive and Common Fisheries Policy Objectives Hamper Policy Synergies in Fostering the Sustainable Exploitation of Mediterranean Fisheries Resources. *Frontiers in Marine Science* Volume 4 <https://www.frontiersin.org/journals/marine-science/articles/10.3389/fmars.2017.00316/full>

⁴ van Leeuwen, et al. (2014) Implementing the Marine Strategy Framework Directive: A policy perspective on regulatory, institutional and stakeholder impediments to effective implementation, *Marine Policy* 50: 325-330 <https://doi.org/10.1016/j.marpol.2014.03.004>

⁵ Murillas-Maza, et al. (2020), Programmes of measures of the marine strategy framework directive: Are they contributing to achieving good environmental status in the Mediterranean?, *Mar Pollut Bull* 161: 111715. <https://doi.org/10.1016/j.marpolbul.2020.111715>

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Reinforce ecological thresholds and harmonized GES methodologies while ensuring that measures reflect the biological, socioeconomic, and cultural specificities of the Mediterranean.

- **Streamline implementation and reduce administrative burden:**

Consolidate reporting streams, especially where MSFD intersects with CFP, Natura 2000, and the Nature Restoration Regulation.

- **Promote coherence with fisheries management (CFP/GFCM):**

Ensure MSFD requirements translate into practical and implementable fisheries management tools and avoid parallel or conflicting processes.

- **Ensure predictability and viable transitions for fleets:**

Consider science-based recovery rates of Mediterranean fish stocks and design realistic, gradual transition pathways with measurable interim milestones while maintaining alignment with the 2030 biodiversity objectives.

MEDAC specifically recommends:

Improving Definitions and Thresholds

- Adopt specific threshold values for bycatch, noise, seafloor integrity and other key descriptors relevant for the fisheries sector and consistent with regional scientific work under different scientific advisory bodies in both environmental and fisheries fora where appropriate, and consider cumulative stressors and impacts, the ecosystem impact and the impact of climate change.
- Where science is still developing, use adaptive thresholds with scheduled reviews (e.g., every 3 years), for more enforceable metrics while ensuring proportionality, and where data gaps persist, apply the precautionary principle to guide threshold-setting and measures.
- Align these thresholds with CFP and GFCM management frameworks, ensuring a unified compliance system for Member States and operators.

Monitoring, Reporting and Data Harmonisation

- Simplify reporting where appropriate through integrated data platforms such as WISEMarine and merge MSFD reporting with existing CFP data streams (logbooks, observer data, REM, RCG structures) where applicable.
- Address data gaps identified through targeted monitoring campaigns (e.g., abundance indices, bycatch data), using EMFAF or regional funding mechanisms where appropriate.
- Consider the use of data gathering not only in MPAs but also in FRAs and future marine OECMs.
- Ensure that species listed under fisheries and environmental frameworks including the CFP and Annexes of regional and international agreements for monitoring and management are included in the PoM (Program of Measures) and the national and transboundary monitoring programme to avoid duplication, maximise synergies and reduce administrative burden.

Phasing and Transition Mechanisms

- Establish a Mediterranean Transition Envelope (2027–2030) allowing for gradual implementation of new requirements, especially where measures may have significant socioeconomic impacts, but with clear targets and end dates in line with regional and global 2030 targets.
- involving stakeholders early to enhance social acceptance and consider the introduction of co-management schemes linking MSFD environmental objectives with local fishery management plans and MPA/Natura 2000 management and objectives, improving stakeholder ownership and compliance.

Improve governance

- Improving coordination across authorities to ensure that MSFD measures dependent on other policies are fully implemented by the relevant authorities dealing with the implementation of these policies;
- Involving the public and stakeholders at the planning stage, taking their contributions into account in the design of measures and ensuring social acceptability of the measures proposed, adopting accompanying measures to limit potential negative impacts if necessary;
- Ensure transboundary coordination across EU Member States for the Programmes of Measures and the Mediterranean Regional Sea Convention to ensure joint action, avoid redundancies and complementarity especially where transboundary impacts are to be expected such as for shared stocks and migratory species.

Alignment with Other (EU) Initiatives

- Ensure legal and practical coherence between MSFD revision, the Nature Restoration Regulation, the Water Framework Directive, the Ocean Pact, the Nature Restoration Regulation, the CFP, National and regional species action plans and legislation currently in revision and preparation like the MSP Directive/the EU Ocean Act to avoid regulatory duplication and ensures a harmonised marine governance architecture.
- Ensure alignment of timelines of the Marine Strategy Framework Directive (MSFD) and maritime spatial planning (MSP) and/or future Ocean Act and ensure the appropriate use of the MSFD data in the MSP planning process (see also the MEDAC advice on MSP) and vice versa include spatial measures and action planned under the Nature Restoration Regulation in the MSFD programme of measures to avoid duplication.
- Consider the Socio-economic impact in the Programme of Measures and ensure alignment with 2030 Sustainable Development and Biodiversity goals to support their objectives.

Data collection and sharing

- Consider how fishers and other relevant stakeholders can be appropriately included in data collection and monitoring programmes.

Ensure level playing field and regional cooperation

Given that the Mediterranean Sea is shared by both EU and non-EU coastal states—and that pressures from fishing and other sectors are often transboundary—MEDAC stresses the importance of strengthened cooperation among all countries. MEDAC recommends therefore that the MSFD revision should:

- Prioritize basin wide alignment of environmental targets, ensuring that obligations applied to EU fleets are not undermined by divergent requirements for neighbouring non-EU fleets operating in shared waters.
- Enhance cooperation through regional frameworks (e.g., UNEP/MAP, Barcelona Convention, ACCOBAMS, GFCM) to maintain and promote equivalent monitoring standards and shared threshold values where applicable and further strengthen the alignment such as the Integrated Monitoring and Assessment Programme (IMAP), that strives for alignment with the MSFD indicators.
- Ensure equity and competitiveness by promoting environmental obligations that correspond with the transboundary nature of Mediterranean ecosystems, especially in areas such as bycatch mitigation, noise management and habitat protection.
- Encourage joint enforcement actions and shared data platforms making full use of already existing platforms e.g. European Marine Observation and Data Network (EMODnet) with non-EU partners to strengthen compliance and reduce risks of regulatory asymmetry.
- Ensure adequate financial and technical capacity for the above.

This approach supports the EU's aim for more integrated ocean governance and ensures that EU fleets—particularly small-scale Mediterranean operators—are not placed at a competitive disadvantage due to unilateral regulatory tightening.

Socio-Economic Perspective

- Support predictable timelines for the introduction of new thresholds;
- Support measures (EMFAF and other funds) for innovation, selectivity improvements, and the rollout of monitoring tools;
- Assessment templates to evaluate socioeconomic impacts before adopting restrictive measures.

Stakeholder Involvement

- MEDAC calls for systematic consultation of Advisory Councils during the drafting of thresholds, aggregation rules and reporting simplification tools.

MEDAC supports a strengthened, enforceable and more coherent revision of the MSFD, one that is firmly grounded in robust scientific evidence, fully aligned with the practical realities of fisheries management, and capable of supporting the socioeconomic resilience of Mediterranean coastal communities. At the same time, the revised framework must ensure effective and measurable



environmental outcomes across the entire basin. MEDAC remains committed to further dialogue with the European Commission and stands ready to collaborate closely throughout the revision process.



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