Feedback from the European Marine Board Secretariat to the European Commission's call for evidence on the revision of rules protecting marine environment

(6 February 2026)

The European Marine Board (EMB) welcomes this initiative to improve the MSFD to better protect the marine environment and simplify its implementation. EMB strongly supports the hard law measures approach in the MSFD revision. The current Directive uses guidelines and recommendations to support legislation, and the evaluation has shown that this is not effective. Greater clarity and direction would support Member States to achieve GES. We further urge that the revised text enables periodic revision of the required threshold values and pressure-reduction targets to ensure that the Directive remains aligned with the best available science. We urge that updated reporting requires data to comply with standards compatible with EMODnet for direct ingestion and public availability. This will greatly enhance open access to public data and complement the Ocean observing system. To improve efficiency, opportunities for Member State cooperation in data gathering should also be sought. In addition, greater alignment of indicators and methodological standards would improve comparability, reduce administrative burden and improve the interplay between the MSFD and other relevant legislations, strengthening the uptake of innovation in regulatory decision-making and overall boosting the impact of research outcomes on policy implementation. The MSFD should therefore support standard operating procedures, quality assurance frameworks, and cross-validation with laboratory methods, to ensure data reliability while enabling innovation. This is further elaborated at the RHE-MEDiation project response.

EMB welcomes the proposal to clarify the definition of the ecosystem-based approach in this context, as recommended in the EMB Position Paper No. 27. At present, the thresholds of the eleven Descriptors for GES are being addressed independently, with limited consideration of the policy overlaps or cumulative effects of these different stressors. For example, assuming that the loss of a small proportion of a species' population is acceptable within GES for each Descriptor, this does not consider what the ecosystem implications are of this loss.

EMB also strongly welcomes the proposed objectives to align the implementation cycle and data collection with the Water Framework Directive, the Habitats and Birds Directives and the Nature Restoration Regulation and to improve coherence with broader maritime policy, in particular maritime spatial planning and fisheries. Considering the Ocean Act, the objectives of the MSFD and Maritime Spatial Planning (MSP) Directive are difficult to reconcile when priority is given to the development of new economic activities, which change the marine and coastal environment, without considering the possible critical consequences (EMB Position Paper No. 27). There is a significant opportunity to strengthen the interplay between the Environmental Impact Assessments' (EIA) requirements for granting human

activities at sea (e.g. offshore renewable energy) and the MSFD requirements at Member State level (EMB Future Science Brief No. 9). Managing the terrestrial water cycle is also critical for healthy coastal ecosystems. Thus, there should also be a more comprehensive link between land and sea-based EU policies, such as the Common Agriculture Policy, not only with EU law and policies on water, nature and marine.

EMB appreciates the formal inclusion of likely impacts of the revision on the environment, economy, society, and cultural values, as recommended in our flagship document EMB Navigating the Future VI. The role and impact of climate change should be central to the MSFD revision. Climate-driven stressors including temperature variability, seasonal shifts and extreme events directly affect marine ecosystems and their health (GES). It is critical for Europe's climate resilience that the marine environment is managed with consideration of future climate change.

All EMB publications referenced can be found here: https://www.marineboard.eu/publication/EMB-publications

Additional feedback from the European Marine Board Secretariat to the European Commission's call for evidence on the revision of rules protecting marine environment

(6 February 2026)

The European Marine Board (EMB) has supported the implementation of the MSFD since it lead the establishment of effective science-policy interfaces for the achievement of GES in European waters under the EU FP7 STAGES project. The EMB has also continuously highlighted knowledge gaps and provided recommendations for the implementation of the different Descriptors for GES, such as outstanding issues and highlights priority actions for addressing underwater noise (EMB Future Science Brief No.7) and better understand seafloor integrity, including deep-sea ecosystems (see EMB Future Science Briefs No. 11, No. 12 and No. 13). In addition, the EMB recommends that the GES descriptions for the 22 Benthic Broad Habitat Types, which requires the description of marine habitat status, could also inform the Habitats and Birds Directives, the 30x30 target under the EU Biodiversity Strategy 2030, and the restoration prioritization under the EU Nature Restoration Law (EMB Future Science Brief No. 11), aligning the implementation and data collection for these EU laws. EMB has also highlighted the importance of other phenomena in achieving GES, not originally explicitly considered in the MSFD, such as Ocean deoxygenation (EMB Future Science Brief No. 10) and acidification (EMB Position Paper No. 27).

EMB notes that under the Mission Ocean, Europe is already taking steps towards a clean, water-wise and circular economy. The findings of the funded projects under this framework should inform the revision of the MSFD. For example, the RHE-MEDiation project (https://rhemediation.eu/) underlines persistent challenges in the coherence between the MSFD, the Water Framework Directive, the Urban Wastewater Treatment Directive, and related environmental legislation. Differences in assessment of concepts, thresholds and reporting requirements complicate implementation across land–sea interfaces. This fragmentation limits the effectiveness of measures addressing nutrient and contaminants' pressures. Likewise, the project reveals limitations related to sensitivity, calibration, robustness of sensors and observation technologies under real environmental conditions, and the influence of water characteristics such as salinity, pH and organic matter. Greater alignment of indicators and methodological standards would improve comparability, reduce administrative burden, and strengthen the uptake of innovation in regulatory decision-making. The MSFD should therefore support standard operating procedures, quality assurance frameworks, and cross-validation with laboratory methods to ensure data reliability while enabling innovation.