

Ref: BSAC/2025-2026/20

Copenhagen 6 March 2026

BSAC input on MSFD call for evidence

The Baltic Sea Advisory Council welcomes the revision of the Marine Strategy Framework Directive (MSFD) as an important opportunity to enhance protection of the marine environment as well as address the challenges affecting marine ecosystems and livelihoods that depends on the healthy marine ecosystems. The BSAC recognises the added value of the MSFD in establishing a comprehensive framework for protecting EU marine waters. The Directive has improved knowledge generation and data collection and strengthened regional cooperation. However, the failure to achieve Good Environmental Status (GES) and the limited progress on the ground demonstrate the need for substantial improvements.

Advisory Councils were, among others, set up to provide stakeholder input to achieving the objectives of the Common Fisheries Policy (CFP). While most of the BSAC recommendations focus on fisheries management, the BSAC notes that despite intensive fisheries management in the Baltic Sea, in many cases, the expected recovery of fish stocks has not materialised. The BSAC therefore considers that the Baltic Sea require a holistic approach due to its unique and vulnerable nature. Efforts at sea must go hand in hand with measures on land.

With regards to the revision of the MSFD, the BSAC highlights the need for an overarching approach that authorities on all levels, be they fisheries, environmental or agricultural, should coordinate their efforts even more to allow the Baltic Sea to overcome the serious degradation it has already suffered. From the BSAC perspective, the coherence and mutual implementation of the fisheries policy, MSFD and the Water Framework Directive is utter most important as reaching the goals of the Common Fisheries Policy is in many ways dependent on progress made within the marine and water protection measures.

In the light of the above, the BSAC suggests following recommendations to enhance the effectiveness, coherence and efficiency of the MSFD, with particular attention to the Baltic Sea.

1. Clarify target setting

- Establish clearer, operational definitions of Good Environmental Status (GES) and the Ecosystem-Based Approach (EBA).
- Harmonise procedures for setting legally binding thresholds at regional and EU level.

- Set measurable, descriptor-specific operational targets and milestones that allow Member States and stakeholders to assess the progress and identify priority action areas.
- Measures should include interdependence between fish species, size and age structure of fish populations and the role of non-fish species predators such as seals and cormorants.

2. Improve Regional Approach

- Clarify obligations and processes on regional coordination to ensure consistent measures and ambition levels within the Baltic Sea region.
- Establish stronger mechanisms to address disparities among Member States within the same region.

3. Strengthen coherence with other sectoral policies

- Ensure that MSFD, CFP, Water Framework Directive and Blue Economy/energy policies mutually enhance and complement each other and allow better and holistic application of the Ecosystem-Based Management.
- Incorporate MSFD objectives into Maritime Spatial Planning to prevent further degradation of marine ecosystems and to avoid conflicts with food production and other existing sea-based economic activities.

4. Integrate Climate Change considerations

- Embed climate resilience considerations into Programmes of Measures.
- Introduce adaptive management mechanisms to ensure flexibility in response to emerging pressures.

Conclusion

For the Baltic Sea region, strengthened regional coordination, clear and practical operational targets, and improved cross-sectoral governance are essential. BSAC stands ready to contribute constructively to the refinement and effective implementation of the Directive to ensure healthy, productive and resilient Baltic Sea ecosystems.