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BSAC Advice on the Implementation of the Nature Restoration Regulation (NRR) in the Baltic Sea

The Baltic Sea Advisory Council (BSAC) welcomes the implementation of the Nature Restoration Regulation (NRR) and its potential to contribute to the recovery of the Baltic Sea ecosystem and its fish populations. The BSAC emphasises that restoration and fisheries objectives are closely interconnected. Restoration supports healthier and more productive fisheries and reduces the risk of future stock decline. Restoration efforts should therefore be understood as an active and/or passive recovery process that improves the condition and functioning of the marine ecosystem and fosters the sustainable, long-term use of natural resources. The BSAC also notes that in the ICES advice for fishing opportunities for 2027, ICES strongly recommends restoration measures in order to increase the productivity and healthiness of many fish stocks in the Baltic Sea.

The BSAC considers that, in the implementation of the NRR, one of the key starting points is to clarify what is meant by “degraded” fishing grounds. The BSAC emphasises that this definition must be science-based and ensure that sustainable fishing practices are not misinterpreted as degradation.

Another challenge to be clarified is alignment of fisheries management with the habitat-based approach of the NRR. While fisheries management focuses on fishing activities and fish populations, the NRR introduces spatially defined obligations linked to habitat condition. Where trade-offs arise, the decision-making process must be transparent and balanced, ensuring that socio-economic consequences for coastal communities and the fishing sector are properly taken into account whilst also ensuring the ecosystem recovery that supports the fishing sector and local communities.

Furthermore, the application of area-based restoration measures must take into account the dynamic nature of marine ecosystems. In particular, pelagic systems and mobile species do not conform to fixed spatial boundaries, and restoration approaches must reflect this reality.

The BSAC also underlines that fisheries alone cannot deliver ecosystem restoration in the Baltic Sea. Other major pressures, such as eutrophication, pollution and habitat modification, must be addressed through a coordinated, cross-sectoral approach.

The BSAC highlights that Baltic Sea is a unique brackish water inland sea with irregular inflows of oxygenated water and with the difference between outflow and inflow coming almost entirely from fresh water running from the surrounding waterways. The quality of the inflowing water is therefore essential for restoring the Baltic Sea ecosystem, and the Water Framework Directive (WFD) is the key instrument for ensuring this.

The BSAC also stresses that the interspecies interactions and the role of predators, such as seals and cormorants as well as other fish species, should be properly assessed and

recognised as part of ecosystem dynamics and food web, and taken into account when evaluating the expected outcomes of restoration measures.

Principles for implementation

The BSAC stresses that successful implementation of the NRR requires an inclusive, source to sea and co-designed approach. Restoration plans and measures should be science based and developed and implemented early and in close cooperation with stakeholders to ensure both legitimacy and effectiveness.

The BSAC emphasises that fishers, together with other on-the-ground stakeholders, should be considered as key actors in restoration success. Their local ecological knowledge, practical experience and involvement in monitoring are essential for effective implementation. Restoration should therefore be developed and implemented as a partnership-driven process rather than a top-down regulatory exercise.

Socio-economic considerations must be fully integrated into the implementation process. Restoration should aim at delivering benefits not only for ecosystems, such as marine ecosystems, but also for people, including fishing communities.

At the same time, restoration should be action-oriented and according to the precautionary principle not delayed due to incomplete knowledge. Existing scientific and policy frameworks as well as monitoring systems provide a sufficient basis to initiate measures, while further knowledge can be developed in parallel.

The BSAC also highlights the importance of ensuring that cross-sectoral co-operation secures that ecosystem conditions do not deteriorate further due to human activities, particularly in areas where restoration measures are needed or are already implemented.

Priority Actions for the Baltic Sea

The BSAC underlines the importance of addressing land–sea interactions, particularly nutrient inputs and hazardous substances, and of building on existing restoration initiatives and best practices in the region.

The BSAC considers that restoration efforts in the Baltic Sea should prioritise measures that deliver clear ecological benefits while minimizing conflicts with existing sustainable fishing activities. These include e.g. nutrient reduction measures in the catchment area, restoration of spawning and nursery habitats, reopening of migration routes, and the recovery of key habitats such as eelgrass meadows, stone reefs and mussel beds.

The Baltic Sea Advisory Council is strongly of the opinion that the Water Framework Directive, the Birds and Habitats Directive, the Marine Strategy Framework Directive and the EU Biodiversity Strategy are essential tools in restoring the Baltic Sea to good health. The priority should be to implement these rather than weakening regulations, such as the Water Framework Directive which should be maintained in its current form. Removing or

allowing exemptions for certain sectors from the non-deterioration obligation would have direct negative consequences for the long-term health of the Baltic Sea.

Recommendations

The BSAC recommends that the European Commission:

- clarify the definition of “degraded” habitats, ensuring that sustainable fishing practices are not misclassified as degradation;
- promote a cross-sectoral approach addressing all major drivers of ecosystem degradation, both non-site and site-specific, not only fisheries;
- ensure effective stakeholder involvement, including co-design of measures with the fisheries sector and other stakeholders;
- assess and address the socio-economic impacts of restoration measures whilst prioritising the restoration of the resources that healthy coastal communities of the Baltic Sea depend on;
- prioritise restoration actions that deliver clear benefits for both ecosystem recovery and fisheries, including water protection measures in the catchment area, spawning and nursery habitats restoration and migration routes;
- take into account the role of species interactions and natural predators, such as seals and cormorants and other fish species, in ecosystem dynamics, and take this into account when evaluating the outcomes of restoration measures.

Conclusions

The BSAC concludes that in the Baltic Sea context restoration is a necessary and urgent step towards restoring productive marine ecosystems and ensuring the long-term sustainability of fisheries. A holistic, inclusive, urgent and action-oriented approach is required to successfully implement the NRR in the Baltic Sea. The BSAC stands ready to contribute to this process and support balanced and effective outcomes towards restoration of the Baltic Sea ecosystem.