BELLONA EUROPA

Bellona Response to the Call for Evidence on the European Ocean Act

CONSULTATION RESPONSE

February, 2026

1. Coherent legal framework for integrated ocean governance

The Marine Strategy Framework Directive remains the core EU law for marine protection, but its implementation is fragmented and often insufficient to achieve Good Environmental Status. The Maritime Spatial Planning Directive has improved coordination of maritime activities, yet it lacks the tools needed to address cumulative pressures and deliver effective ecosystem-based management.

The European Ocean Act should therefore provide a coherent governance framework that integrates and reinforces existing instruments. It **must clarify responsibilities**, strengthen Member State accountability, align spatial planning, environmental protection, and climate objectives. Without such integration, EU commitments will continue to fall short in practice.

Growing competition for maritime space from shipping, fisheries, aquaculture, offshore energy, restoration and conservation demands a **harmonised ecosystem-based approach**. The Act should establish mechanisms to assess cumulative pressures and ensure that multi-use areas do not lead to environmental degradation. Maritime spatial planning must move beyond sectoral decision-making and apply binding, science-based thresholds for ecosystem protection.

Bellona supports the EU's precautionary stance on seabed mineral extraction and urges that it be embedded in the Ocean Act. Deep-sea mining poses significant and poorly understood risks and should not be authorised without robust scientific knowledge and strict safeguards.

The Act should also address legacy impacts from past petroleum activities through systematic mapping, binding restoration obligations and innovative solutions such as habitat reconstruction. Destructive practices like bottom trawling must be subject to ecological risk-based limits, particularly in sensitive habitats.
A common European methodology for identifying particularly valuable and vulnerable areas is essential. Divergent national approaches create inconsistent protection; science-based processes, such as Norway's model for defining vulnerable areas, should guide EU-wide criteria, with protection insulated from short-term political pressures[1].
Finally, the Ocean Act should strengthen cooperation with regional sea conventions including OSPAR, HELCOM and the Barcelona Convention, and establish clearer compliance mechanisms to ensure consistent application of environmental rules across Europe's sea basins.

[1] Faglig forum for norske havområder Faglig forum for norske havområder

2. Open-source and transparent data sharing must be achieved for ocean governance

A central priority for the Ocean Act must be to strengthen cooperation on ocean data and observation across the Union. Fragmented data systems remain a major barrier to effective ocean governance, as marine information is dispersed across national agencies and institutions in incompatible formats and with uneven access conditions. As a result, valuable data are often unavailable for wider use, limiting coordinated monitoring, shared responsibilities and efficient use of resources.

These gaps undermine assessments of cumulative environmental impacts, hinder evaluation under the Marine Strategy Framework Directive, and weaken Europe's capacity to monitor climate-related risks and support EU-wide modelling and forecasting. Comparable time series and coordinated observation strategies are frequently lacking, while inconsistent standards and metadata practices create uneven datasets and persistent gaps, particularly in biological and biodiversity monitoring[2].

EU initiatives such as EMODnet and the Copernicus Marine Service have improved access to marine data, but they still rely heavily on voluntary contributions and legacy national systems. This prevents the full use of existing observations for climate modelling, maritime spatial planning and environmental protection[3].

The Ocean Act should therefore establish a clear and enforceable legal framework to ensure the standardisation, interoperability and open accessibility of marine data generated by public authorities and through EU and national public funding. All publicly funded marine data should be made available in harmonised formats with common metadata standards and transparent access conditions.

Where marine data are generated by private operators under licenses, permits or public support schemes, the Act should include appropriate data-sharing obligations so that information essential for environmental assessment and marine planning is treated as a public good.

3. Strengthening ecological knowledge and biodiversity monitoring

Beyond physical and oceanographic parameters, the Act must significantly strengthen the collection and accessibility of ecological data. Europe currently lacks consistent mapping and monitoring of degraded marine species and habitats. This gap limits the ability to evaluate biodiversity trends or to project how ecosystems will respond to climate change, pollution and human pressures.

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[2] https://maritime-forum.ec.europa.eu/theme/governance/european-ocean-days_en

[3] B. Martín Míguez and others, 'The European Marine Observation and Data Network (EMODnet): Visions and Roles of the Gateway to Marine Data in Europe' (2019) *Frontiers in Marine Science* 6, article 313, doi:10.3389/fmars.2019.00313.

The Ocean Act should therefore require systematic monitoring of vulnerable species and habitats, harmonised ecological indicators across sea basins, common methodologies for assessing habitat degradation and open access to biodiversity datasets. Such requirements would support the EU Biodiversity Strategy for 2030, the Nature Restoration Law and upcoming EU Nature Credits methodologies by providing a robust evidence-base for restoration planning and for the identification and management of Particularly Valuable and Vulnerable Areas.

4. Governance of a European Ocean Observing System

To deliver these objectives, Bellona supports establishing a formal European Ocean Observing System with a clear governance structure linking the Commission, Member States, regional sea conventions and scientific organisations. This system should coordinate observation planning, reduce duplication and develop federated data infrastructures consistent with EU digital standards, the FAIR principles and the European Data Spaces framework.

Investments in secure and energy-efficient European cloud solutions should be prioritised to ensure that expanded digital monitoring aligns with EU climate objectives. Coordinated infrastructures, building on Copernicus services and the EU Digital Twin of the Ocean, can enable real-time assessments, early warning systems and more effective enforcement of environmental rules.

Transparent and standardised data are essential for managing cumulative pressures from fisheries, shipping, aquaculture, offshore energy and legacy pollution. Strong data governance will improve protection of sensitive areas, support seabed restoration and enable science-based decision-making.

The Ocean Act should also address Invasive Aquatic Species by establishing EU rules on biofouling management. The EU should align with the IMO 2023 Biofouling Guidelines and forthcoming 2025 Guidance for In-Water Cleaning. Proactive, environmentally sound hull cleaning, supported by cooperation between ports and regulators, is one of the most effective tools to limit the spread of invasive species.

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