

# Marine Strategy Framework Directive

## CONSULTATION RESPONSE

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Bellona welcomes the European Commission's initiative to revise the Marine Strategy Framework Directive (MSFD).

**Global marine environments are undergoing a systemic transformation that threatens the foundational stability of global climate and food security.** In a European context, the 2025 evaluation of the MSFD confirmed a sobering reality: **the European Union failed to achieve the 2020 goal of Good Environmental Status (GES) in most of its waters.** This failure represents a fundamental mismatch between the ecological reality and threats many marine environments face, and the political ability to protect them.

We are witnessing a cocktail effect on European oceans driven by climate change, biodiversity loss, and pollution. **These pressures compound one another, creating a multistressor situation that represents a synchronised collapse of the ocean's self-regulating capacity, pushing many marine habitats beyond their ecological tipping points.** The primary obstacle to effective protection is not a lack of scientific data but a chronic lack of accountability and binding targets. Under the current MSFD, Member States have enjoyed excessive discretionary space to define their own targets, strategies, and timelines. **This has led to a fragmented landscape where marine environmental protection is often treated as a secondary ambition rather than a primary legal requirement.**

Bellona recommends three priorities for the Commission to consider in the upcoming MSFD revision.

## **Priority 1: Protect the breadth of marine diversity and address fragmented management**

**The most critical flaw in the current MSFD is the judicial and political fragmentation that allows for an inconsistent and narrow application of marine protection.** To date, protection strategies have often focused on a limited set of species or a small fraction of coastal habitats while leaving the vast diversity of the ocean, including deep-sea ecosystems and pelagic zones, largely ignored. **A future MSFD must establish a unified, ambitious framework that binds Member States to a larger degree than today, ensuring that the entire breadth of marine ecosystems is sufficiently protected.** This requires adopting a protection strategy that reflects the biological reality of the ocean as an interconnected continuum.

To align with the Kunming-Montreal Global Biodiversity Framework, **the EU must establish legally binding targets that mandate the protection of the ocean's inherent diversity.** Protection must not only address ecosystems already under threat but must ensure that vulnerable ecosystems are protected before they reach a state of collapse. This means that the MSFD must move beyond a one-size-fits-all approach and recognise that threats manifest differently across different ecosystems.

Ambitious protection policy must include specific ramifications for failure to achieve these targets. **If a Member State fails to protect the diversity of ecosystems within its waters, there must be a clear legal mechanism for intervention.** Bellona recommends that the revised MSFD moves to ensure that marine protection goals accurately reflect the actual ecological threats and the functional roles of ecosystems within the wider ocean. Current frameworks often overlook the complex interactions and services that allow ecosystems to withstand external stressors.

**The EU needs to have a strategy that effectively protects critical biological infrastructure, from coastal kelp forests to deep sea reefs.** A protection strategy that reflects the true diversity of species and marine ecosystems is the only way to ensure the long-term resilience of European waters in future climate change conditions.

## Priority 2: Protection must be combined with restoration

In the context of 21st-century climate change, **protection alone is no longer a sufficient tool for marine conservation.** The revision of the MSFD must recognise that marine protection and active restoration are two equally important, inseparable tools that must be deployed in conjunction. Bellona recommends establishing guidelines in the revised MSFD that safeguards key marine regions from intensive human activity while simultaneously restoring the functional integrity of the ecosystems within the protected area. In many regions, human activity and climate change have damaged ecosystem resilience so severely that a passive approach will fail to achieve GES. Protecting a degraded ecosystem will not necessarily lead to recovery if the ecosystem has passed a tipping point. Bellona therefore recommends that **the EU must shift its focus toward large-scale restoration techniques and provide the necessary funding to ensure these projects succeed on a meaningful scale.**

A significant issue in current marine governance is the loss of transition zones, with a severe reduction in the ecological boundaries between coastal, shelf, and deep-sea environments. The degradation of these zones has led to ecosystem fragmentation, which ultimately leads to a loss of diversity on multiple scales (genetic, species and ecosystem diversity). **A holistic MSFD must mandate the creation of protected areas that have the size and capacity to be ecologically functional, combined with restoration plans designed to restore the transitional nature of many marine ecosystems.** The EU must prioritise ocean resilience on a scale that secures the essential services we depend on, such as carbon sequestration.

## Priority 3: Management systems must protect the land-sea continuum

Current MSFD and management frameworks across Member States insufficiently captures the dynamics between marine and terrestrial systems. **This creates a governance gap that ignores the most dramatic ecological shifts occurring.** While the MSFD is focused on the ocean, it

must evolve to understand that the oceans are the ultimate recipient of terrestrial inputs. Climate change and land use changes are no longer localised threats, they are fundamentally altering the biological, chemical and physical cycles connecting land and ocean.

**Bellona recommends that the revised MSFD must enable a new type of ecosystem management focused on the dynamics across ecosystems and the land-ocean interface.**

As climate change intensifies extreme weather events, the influx of terrestrial organic matter, sediments, and nutrients into our coastal waters is reaching unprecedented levels, driving to eutrophication, coastal darkening, and freshening of our oceans. When the EU manages marine habitats in isolation, terrestrial-driven cycles that can decrease the effect of even the most robust marine protection measures are ignored.

To achieve a dynamic and resilient marine environment, **Bellona recommends that a revised MSFD must adopt a framework that transcends traditional geographic and administrative ecosystem boundaries.** The revised MSFD should recognise coastal marine regions as a transition zone through which vast quantities of matter and energy flow, and incorporates global biogeochemical cycles, such as carbon, nitrogen, and phosphorus, as core indicators of marine health.

## Conclusion

The revision of the MSFD represents a historic opportunity for the EU to bridge the gap between ambitious climate rhetoric and the ecological threats facing our ocean. The failures of the past two decades have not been for a lack of scientific understanding, but rather a lack of environmental management that sufficiently understands the requirements of ecological protection and recovery. Bellona therefore emphasises that the revised MSFD must represent a shift in management strategy and ambition.

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