



MARINE STRATEGY FRAMEWORK DIRECTIVE

WWF POSITION
MARCH 2026

CHARTING THE COURSE TO HEALTHY SEAS

Healthy oceans are essential to climate resilience, food security, and long-term economic prosperity in Europe.

The revision of the Marine Strategy Framework Directive (MSFD) is a key opportunity to reset the goal towards **Good Environmental Status (GES) by 2034 and align marine European governance with the EU's broader vision for protecting at least 30% of its oceans, with 10% under strict protection by 2030**. This would place European seas on a clear trajectory to recover by 2030, in line with global biodiversity commitments.

To achieve this vision, WWF recommends **six key priorities** that should guide the revision of the MSFD:

1. **The EU should set new quantitative minimum environmental targets for all sea basins.** This is important as Member States have not yet set environmental targets for all GES descriptors. The EU must therefore step in to clarify minimum targets for each sea basin and finally establish a route towards the achievement of GES;
2. Strengthen **reporting, monitoring and**

management of Marine Protected Areas (MPAs) as part of a solution to reach GES;

3. Align the MSFD with **other EU marine legislation**;
4. Mandate **enforceable and measurable actions** in the Programmes of Measures (PoMs);
5. Secure **adequate funding** for environmental monitoring and PoMs to achieve GES;
6. Improve **data sharing, implementation, monitoring and reporting procedures**.

These six priorities will result in an effective MSFD, which will yield real benefits for the health of the ocean, and complement the EU's parallel ambition for protecting 30% of its oceans by 2030, including 10% of strict protection.

CONTEXT



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The MSFD is the EU's cornerstone marine law when it comes to protecting and conserving the ocean's health. The Directive establishes the objective of achieving 'Good Environmental Status' (GES) in all marine waters in the EU, with an initial deadline originally set for 2020. The aim of GES is set through assessing 11 interconnected descriptors, which depict different aspects of marine ecosystem health. The European Commission has calculated the potential benefits deriving from the full achievement of GES at 15.8 billion a year.¹ The need to empower the MSFD therefore goes far beyond purely environmental benefits.

The 11 GES descriptors (see box below) are the basis of the MSFD, but several criteria and methodological standards under each descriptor are also used to guide action in Member States. Descriptors define what needs to be assessed (e.g., invasive species or marine foodwebs), while criteria and methodological standards,

set at EU level and applied nationally, establish how much improvement is needed (e.g., reducing marine litter by a certain percentage by a given year). Then the environmental targets and associated indicators, set at national level, showcase how much improvement is needed in each Member State. This adds flexibility to the Directive, so that each Member State can investigate the critical environmental issues in its waters and create Programs of Measures (PoMs) to reach the targets accordingly.

Through the MSFD, Member States are supposed to coordinate at sea basin level (the Baltic Sea, Black Sea, Mediterranean and North Sea). This is important because pressures like pollution and overfishing do not stop at marine borders and coordinated action delivers more consistent and effective results. The role of Regional Sea Conventions (RSC), namely the Barcelona Convention, Bucharest Convention, HELCOM and OSPAR, is encouraged through the MSFD and plays a central role in facilitating joint assessments and providing shared approaches. The Directive ensures that monitoring and measures are coordinated regionally, using common methods and data, so that GES is achieved collectively rather than in isolation.

¹ European Commission, Staff working document executive summary of the evaluation, [557d77b9-06d8-42a6-8a1f-c6a2e76da148_en](https://ec.europa.eu/eurostat/tgm/table.do?tab=table&init=1&language=en&plugin=1)

The 11 MSFD descriptors include: the health of biodiversity (**D1**), the incidence of non-indigenous species (**D2**), the health of commercial fish stocks (**D3**), the balance of marine food webs (**D4**), the major issues of eutrophication (**D5**), damage to the seabed (**D6**), and changes to hydrographical conditions (**D7**). There are also marine health problems like pollution through contaminants in marine environments (**D8**) and through contaminants found in fish (**D9**), reduced levels of marine litter (**D10**), and damage to marine life through underwater noise (**D11**).

WWF RECOMMENDATIONS

The original target of achieving GES by 2020 was missed. Since then, there has not been sufficient action to ensure the health of our ocean through this Directive. To set a new course, we recommend setting a strict new deadline to reach GES throughout Europe's sea basins by 2034.

This date is derived directly from the implementation cycle of the MSFD. The Directive follows the six-year implementation cycle of PoMs, last submitted in 2022. This allows for two full reporting cycles, (2022-2028 and 2028-2034), to be completed, and gives Member States a realistic timescale with which to put in place the measures needed to reach GES. WWF highlights the following improvements in the MSFD revision:

1. The EU should set new quantitative minimum environmental targets for all sea basins

While the Directive's flexibility allows countries to tailor measures to their specific marine pressures, it has also resulted in fragmented action, inconsistent protection levels, and weak regional coherence. To address these shortcomings, the revised MSFD should establish EU minimum quantitative environmental targets for all 11 descriptors in all sea basins.

The minimum baseline targets would set a floor and not a ceiling, meaning that Member States can develop and move beyond them according to their sea basin pressures and ecological conditions (or if environmental targets are already in place for that descriptor or sea basin).

Minimum targets per sea basin would ensure a level playing field for Member State and across ocean industries. At the same time, minimum standards would improve regional cooperation between Member States with differing levels of ambition or regulatory capacity. Additionally, this could support the identification and restoration of degraded marine ecosystems and provides coherence with the EU Nature Restoration Regulation (NRL) and the CBD Global Biodiversity Framework Target 2.

2. Strengthen reporting, monitoring and management of Marine Protected Areas (MPAs) as part of a solution to reach GES

The role of Marine Protected Areas (MPAs) must be strengthened as a key tool for GES delivery. All Member States have established MPAs, but effective management measures to address harmful activities within these areas are largely absent.¹ Destructive fishing, underwater noise, pollution, to name a few, continue to persist in these locations.

MPAs are often designated as part of Natura 2000 sites through the Habitats Directive. However, this Directive allows designation of MPAs for a limited number of marine species and habitats, which has led to a fragmented feature-based approach when implementing protection against e.g. mobile, bottom-contacting fishing gear. In contrast, the

¹ WWF, 2025. [Protecting and restoring our seas: Europe's challenge to meet the 2030 targets](#)

MSFD addresses the whole spectrum of marine ecosystems. MPAs can immediately affect a wide range of GES descriptors, for example biodiversity (D1), commercial fish stocks (D3), food webs (D4), seafloor integrity (D6), marine litter (D10) and noise (D11) provided effective management is in place. Therefore, MPAs are a very useful tool to promote achievement of GES and policymakers should strengthen the MSFD to allow greater monitoring, assessment and enforcement of MPAs set up under the MSFD.

The revised MSFD should incorporate new provisions for obligatory preparatory assessments, targets and measures to monitor and improve the state of MPAs. This can be done through strengthened reporting obligations on ecological coherence, representativity and effectiveness of national MPA networks. This would enable the assessment of MPAs as data reported would follow consistent metrics, enabling effective transboundary assessment. Additionally, Fisheries Restrictive Areas (FRAs) and other effective area-based conservation measures (OECMs)¹ outside MPAs should be considered as complementary measures of marine conservation, as they can also contribute to similar GES descriptors as MPAs.

3. Align the MSFD with other EU marine legislation

One weakness in the implementation of MSFD is the absence of coherence with other marine EU laws. The MSFD has limited harmonisation with other laws such as the Maritime Spatial Planning Directive (MSPD) and the Nature Restoration Law (NRL). In some Member States, the measures proposed in their PoMs are not implemented because they contradict other decisions taken in other laws, such as the maritime spatial plans and fisheries policies. Commission assessments² show that only a small number of Member States have incorporated MSFD descriptors, thresholds, or measures for active or passive restoration into their maritime spatial plans. Natura 2000 sites also remain largely unmanaged in ways that would support GES. For example, Dutch marine spatial planning follows a strongly sectoral approach that neglects the MSFD's precautionary requirements³, while in France the gaps identified in

the national strategic document stem largely from poor alignment between MSPD decisions and MSFD measures for fisheries, energy development, and habitat protection.⁴

Better alignment between the MSFD and MSPD is needed, as spatial planning decisions directly affect the cumulative pressures on the marine environment. However, according to the Commission,⁵ very few Member States maintain a link between maritime spatial plans and MSFD thresholds, resulting in expanding offshore renewable energy development, shipping routes, and aquaculture development without conducting systematic assessments of their compatibility with GES. The revised MSFD should make Member States set up a single national competent authority or an interministerial coordinating system to ensure that there is a stronger alignment between MSFD targets and measures and the implementation of MSPD processes. Better governance coherence can ensure spatial planning becomes a driver rather than a barrier to GES.

The MSFD should also recognise the role of Common Fisheries Policy (CFP) objectives, such as the implementation of ecosystem-based approach fisheries management, in achieving GES through its contribution to health of commercial fish stocks (D3) and food webs (D4). The revised MSFD should also reinforce its coherence with the Water Framework Directive (WFD) to ensure that the measures addressing the land-based pressures, e.g., nutrient and chemical pollution, are mutually reinforcing in both water and marine environments. Greater alignment with the ecological status elements of the WFD will reduce the causes of eutrophication (D5) and pollution (D8), improve the health of our ocean.

1 WWF, 2025. [Beyond Marine Protected Areas \(MPAs\): Integrating other effective area-based conservation measures \(OECMs\) to strengthen EU conservation networks](#)

2 European Commission, 2025. [Commission staff working document](#) accompanying the document report from the Commission to the Council and the European Parliament.

3 Birdlife, 2023. [Assessment of the Marine Spatial Plan of the Netherlands:](#)

[Alignment of the Dutch Marine Spatial Plan with EU environmental objectives](#)
4 CrossGov, 2025. [Coherent & Cross-compliant Ocean Governance for Delivering the EU Green Deal for European Seas, Marine Policy Frameworks in the French Mediterranean Sea: Assessing Coherence and Cross-Compliance Challenges](#)

5 European Commission, 2025. [Commission staff working document](#) accompanying the document report from the Commission to the Council and the European Parliament.

4. Mandate enforceable and measurable actions in the Programmes of Measures (PoMs)

The most recent assessment of the Commission¹ revealed that regional incoherence of MSFD implementation is a systemic problem affecting all the EU's sea basins. For the Baltic, Member States have differing approaches on defining the concepts of GES, setting targets, and monitoring in descriptors such as biodiversity, seafloor integrity, and underwater noise. This has meant that there has been fragmentation with regards to the baselines, assumptions and exemptions that countries apply. Within the North East Atlantic region, there are considerable differences among countries regarding the adequacy of descriptors such as D6, D10, D11, and D7, but mostly due to the lack of harmonised application of OSPAR thresholds.

Within the Mediterranean region, regional coherence is weak, in particular with non-EU countries, undermining the collective delivery of GES at sea basin scale. Member States apply different indicators and thresholds, while PoMs often consist of studies, monitoring or further assessments rather than concrete management actions. Lastly, MSFD data is almost completely lacking in the Black Sea.

A solution for the MSFD here is to focus on an opt-in approach to greater regional cooperation. For sea basins where closer cooperation is possible, an opt-in mechanism could be included, where these states formally indicate their willingness to submit joint monitoring, targets, or PoMs. This would enable sea basins that are ready to advance at a faster rate to do so, while maintaining flexibility across all sea basins.

Moreover, the revised Directive should improve reporting of concrete and detailed measures that have been implemented in the PoMs. Member States need to be encouraged to deliver spatially-explicit, time-bound, actionable and measurable targets to reduce pressures in the marine environment for each of the 11 descriptors when reporting in their PoMs.

5. Secure adequate funding

The effectiveness of the MSFD has been hampered by a lack of financing. To be effective, the revised MSFD should ensure substantial increases in public financial resources. Strengthened implementation requirements under Articles 10 and 13 should be matched by dedicated and predictable financing streams that also support effective MPA management and large-scale ecosystem restoration.

Consistency of finance is key to sustaining monitoring networks, enforcing measures, coordinating at the regional level and enabling delivery of GES by 2034.

Future EU funding for ocean and fisheries should be explicitly aligned with MSFD implementation, with funding conditional on demonstrable contributions to GES. This includes prioritising support for low-impact fishing practices, gear selectivity improvements, participatory monitoring, spatial adaptation to MPAs, ecosystem restoration and co-management structures. Clear earmarking of EU and national funding for MSFD delivery would strengthen coherence between fisheries, biodiversity and climate objectives.

6. Improve data sharing, implementation, monitoring and reporting procedures

An imbalance in data collection and the lack of sharing of data among Member States and among EU legislation creates another obstacle for proper MSFD implementation. This is because the data collected by Member States for the MSFD is different from that collected for the Common Fisheries Policy (CFP) and the Maritime Spatial Planning Directive (MSPD). Similarly, at the RSC's level data are not easily extrapolated from one to the other, causing more problems with data sharing. This results either in duplication or in gaps forming in the datasets. EMODnet, which was meant to standardise and centralise the data input from Member States, often remains underutilised. This has resulted in a lack of transparency and slowed down overall progress towards achieving GES.

A more effective MSFD would need to ensure that Member States use existing EU platforms such as WISE Marine, EMODnet, RSC databases, Digital Twin of the Ocean better and allowing for real-time sharing between national authorities, RSCs, research institutions, and stakeholders. Simplified reporting cycles and harmonised data standards will enable faster assessments, better analysis of cumulative effects, and better regional coordination. The MSFD should also support coordination across national authorities, to ensure that MSFD data is properly shared across competent bodies. This would enable Member States to collectively analyse pressures and trends, avoid duplicating requests for data and provide a clearer picture of monitoring environmental change.

¹ European Commission, 2025. [Commission staff working document](#) accompanying the document report from the Commission to the Council and the European Parliament.

CONCLUSION

To achieve a healthy and productive ocean for future generations and to restore the marine environment in Europe, **the MSFD should set a new science-based target and time-bound objective to achieve GES by 2034**. This should be accompanied by commitments, implementation, long-term, continuous monitoring and financial resources. This new target should be accompanied by new minimum quantitative environmental targets for all 11 descriptors in all sea basins. This is important not only for reversing the loss of biodiversity and reducing cumulative pressures, but also for providing policy certainty for those sectors that operate in the marine environment and for scaling up the restoration of degraded marine ecosystems where pressure reduction alone will not be sufficient to achieve GES. Together with other EU commitments, such as protecting 30% of European seas with 10% strictly protected, a new MSFD with a revised GES target can finally put the EU on a credible path towards true marine stewardship to restore a healthy ocean.

CONTACT:

ALIKI KOLOVOU, OCEAN POLICY OFFICER
WWF EUROPEAN POLICY OFFICE
AKOLOVOU@WWF.EU



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WWF, 28 rue Mauverney, 1196 Gland, Switzerland. Tel. +41 22 364 9111
CH-550.0.128.920-7

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