# CrossGoW

**Coherent & Cross-compliant Ocean Governance for Delivering the EU Green Deal for European Seas** 

**Case Study: Mediterranean** 

STEP 2





### **Table of contents**

Introduction	Error! Bookmark not defined
Step 2 – Assessing the state of play in coherer	nce and cross-compliance





#### **General introduction**

Three stages frame the case study implementation process: design, implementation, and evaluation<sup>1</sup>. This process is documented following four consecutive steps:

- Step 1: prepares the case study research design by specifying research objectives, cases, research questions and key actors.
- Step 2: assesses, within the relevant case study area, the current state of play in coherence and cross-compliance and the implications for policy outcomes.
  - Both frameworks the <a href="D1.3 Policy Coherence framework">D1.4 SPSI framework</a> have been aligned: in the Policy Coherence framework, the guiding questions for the SPSI explanatory variable are the main questions of each building blocks in the SPSI framework.
- Step 3: answers WP3 and case-study specific research questions; summarises other findings (if any); draws conclusions from the cases including areas for improvement
  - The current document presents the template that case study leaders will use to document this analysis.
- Step 4: Evaluate the overall case study process.
  - This step is related to D3.4; independent guidelines for it will be provided in due time".

Case study leaders must follow these steps as that will help ensure collection of data in a harmonized way.

<sup>&</sup>lt;sup>1</sup> A framework for implementing case studies in CrossGov" was presented <u>Deliverable3.1.</u> This framework has been adapted according to the developments of the case study work, and the developments in the WP1 methodologies. In particular, the structure of the templates for Step 2, Step 3, and Step 4 have been adapted accordingly.



## Step 2 – Assessing the state of play in coherence and cross-compliance

All information answering the frameworks' questions should be made available in this document, which will later be used to write cross-case analyses in WP3, and feed into WP4 (Roadmaps and Methodologies). However, we encourage you to bring out only the key messages in the boxes given below. We therefore would suggest a limit of 2 - 3 pages per variable/attribute. Additional and supporting information, linked to the information provided in the boxes, can be included in the form of annexes. The number of Annexes and the number of pages for these is not limited.

All analyses must be scientifically argued with information gathered from different sources (e.g. literature review, interviews, ...).

Please note that the **SPSI framework** is seen as the further elaboration of one of the explanatory variables of the **Coherence Framework**; something that can help explain the lack of coherence. **Both frameworks (the SPSI and the Coherence framework) have been aligned**: in the Coherence framework, the guiding questions for the SPSI explanatory variable are the main questions of each building blocks in the SPSI framework.

For further analysis of the SPSI explanatory variable, please refer to the SPSI framework.

Based on your case study specificities, only relevant attributes/variables must be selected and answered. In the boxes below you can document the answers for the questions you addressed. Here we encourage you to bring out the key messages. Additional and supporting information, linked to the information provided in the boxes, can be included in the form of annexes. Please bear in mind that we are exploring the relationship (coherence) between policies/plans. Please indicate which cluster of policies/plans/strategies the coherence assessment is being applied to. It is expected that there will be a set of tables for each assessed cluster.

When relevant, the Figures provided in <u>D1.2 Policy brief</u> and Figure 6 of <u>D1.3</u> on the graphical mapping of coherence for a case study can be used as inspiration for presenting the data from your case study.





#### Coherence attribute nr. 1: Policy Objective

The outcomes, impacts, or the results that the policy sets out to achieve, as specified in the articles of the policy document, as well as broader objectives referred to in the preamble. May be referred to in policy documents as goals, objectives, targets, or commitments.

For policies to be coherent:

 The policy objectives should be aligned or complementary and not contradict or impede each other.

#### 1. Is the policy cross-referencing the policy objectives of another policy?

Barcelona Convention's post-2020 SAPBIO (Strategic Action Plan for Biodiversity) is the overarching biodiversity framework aligning the Barcelona Convention system with the Global Biodiversity Framework (GBF) under the Convention on Biological Biodiversity (CBD), and to a large extent also with the EU's Biodiversity Strategy for 2030 (BDS). On the latter, 30% protection commitment by 2030 is included in the SAPBIO, but 10% strict protection is not. All these policy objectives are referenced in the document. All that being said, European conservation policies have been judged ineffective in managing the complex Mediterranean situation (Katsanevakis et al., 2020). The Mediterranean countries also lack a shared vision and apply divergent conservation policies, consequently limiting transboundary collaboration and large scale coherent ecological networks (Katsanevakis et al., 2020).

The main overarching fisheries policy is the General Fisheries Commission for the Mediterranean and Black Sea's Strategy for 2030 (GFCM 2030 Strategy). This strategy mentions only global level policies explicitly, but based on interviews, it is clear that its elaboration was done in close cooperation with the SAPBIO. SAPBIO, in fact, mentions GFCM 2030 Strategy or its drafts a number of times, showing that cross-referencing and consideration of targets were done. Based on relevant institutional interviews, it can be concluded that the two main overarching policies are aligned with each other in their objectives and goals. There has been a continuous decline in catches since mid 1990s (Piroddi et al., 2020, FAO, 2023). Fishing thus remains one of the main driving forces behind changes in species dynamics, since overfishing and fishing outside of biologically sustainable limits remains prevalent (Piroddi et al., 2020).

Climate change, at this moment, does not have a dedicated overarching policies at the level of the Mediterranean yet. UNEP/MAP (United Nation's Environment Programme/Mediterranean Action Plan), which serves as Barcelona Convention Secretariat, is actively mainstreaming climate change topics into their policies. While they publicly admit that they might be a bit late doing that, they are moving into the right direction now (Fish Forum round table). At this moment, climate change topics are dispersed among different RACs (Regional Activity Centres) of the Barcelona Convention, with Plan Bleu (one of the RACs focussing on sustainable development) currently hosting Mediterranean climate change assessment (MedECC - Mediterranean equivalent to IPCC assessments). By the end of 2025 a new RAC will be established just on climate change in Turkiye. At the same time, the Barcelona Convention's Ecosystem Approach and IMAP (Integrated Monitoring and Assessment Programme), which mirror the EU's MSFD system are being revised and updated, with one of the aims being to include climate change considerations in them as well. This partly includes also coordination with GFCM and possible inclusion of considerations of climate change impacts on fisheries. This process is running in parallel with MSFD revision in the EU and is ongoing. Whether MSFD will actually enter into an actual revision is still unclear, at the time of writing. The background assessments have been prepared and published, but the actual review is pending a political decision at the level of the relevant European Commissioner. There is a recognition of climate change as a significant threat to biodiversity and having an impact on Barcelona Convention policy framework, but while the monitoring of impacts on MPAs (marine protected areas) is not comprehensive, the assessments of potential impacts on the socio-economic systems are non-existent (Plan Bleu, 2020). Plan Bleu (2020) has recommended four indicators, with the first one linked to fisheries and their revenue per unit effort, while also believing that MPAs may play a vital role in understanding climate change impacts on economic and social systems. Additionally, MPAs can contribute to protection of blue carbon habitats and mitigating the impacts of climate-driven events (e.g., tidal surges, storms, waves, floods, Plan Bleu, 2020). However, the integration of biodiversity actions with climate actions has not happened yet systematically. It is also important to note that even on EU level, with its ambitious climate change policies, DG CLIMA remains one of the smallest DGs and the majority of their work goes into mainstreaming climate changes into sectoral policies (interviews).





On the fisheries side, GFCM is also starting to integrate climate change considerations, but they are at the early stages, currently setting up their Network of Experts, to be coordinated by the Task Force and preparing the ToR for this group to support the functioning of GFCM (the first meeting of this new network took place 29<sup>th</sup> April 2025, consultation through July 2025, decisions expected in December 2025). Consequently, it is impossible to assess the cross-referencing of biodiversity, fisheries, and climate change policies, since the latter are just being set up. In relation to climate change, Pita et al. (2021) claim that northern Mediterranean fisheries target more climate vulnerable species, while northern African states are in general more vulnerable to climate change. They hypothesise that fishing is likely to negatively impact the growth rate of exploited species, reducing their resilience and recommend more MPAs to buffer the impacts of climate change and increase species resilience. Despite the existing policy framework, there is a lack of a formalised process to provide and integrate advice in support of the ecosystem approach into EU fisheries management, with barriers being identified among the lack of capacity to operationalise the concept (Ramirez-Monsalve et al., 2021).

2. Are the policy objectives aligned between policies? (substance as well as spatial and temporal scales such as deadlines for achievement, and geographical application)

Post-2020 SAPBIO and GFCM 2030 Strategy are aligned in their objectives and timelines, as well as their assessment deadlines, even if assessments are performed separately (SAPBIO is assessed by SPA/RAC – Specially Protected Areas, while GFCM conducts their own assessments on their end). Barcelona Convention, as a whole and including SPA/RAC, have a signed Memorandum of Understanding with GFCM, which is the basis for their cooperation.

According to the interviews, this cooperation is not always the most straightforward and there are wishes for closer cooperation. Nevertheless, all fishery components included within the Barcelona Convention's system are fully integrated and dependent on GFCM. Therefore, institutionally and on the policy level, everything is in place for continued cooperation and future alignment of policies. Some interviewees also pointed out that there is still need for more policy coherence.

3. Are the EGD objectives mainstreamed into the policy?

EGD objectives as such are not directly binding or relevant for the entirety of the Mediterranean. While the Mediterranean EU Member States and the European Commission as a contracting party to both GFCM and Barcelona Convention, are using their influence to push their policy priorities, including elements of EGD into the Regional Sea policy framework too, both through their representation of interests in the meetings, as well as through extensive funding and political maneuvering. Still, it is crucial to realise that the EGD objectives cannot be seen as directly relevant at the scale of the Mediterranean.

The biodiversity commitments of the EGD are partly mainstreamed into Mediterranean policies. Both Barcelona Convention and GFCM are committed to 30:30 targets, although whether this is due to the EGD/BDS or the GBF or BBNJ is debatable. The 10% strict protection target is only relevant for the EU Member States and has not been taken up at the Mediterranean level. While the EU Nature Restoration Regulation has been adopted, neither Barcelona Convention nor GFCM have yet considered nature restoration through their policies and decisions, although the expectation is that this will be tabled at the next Barcelona Convention Conference of Parties (CoP) in Egypt in December 2025. Some interviewees also pointed out that the implementation of the Nature Restoration Regulation in EU waters should bring more focus on marine habitats that have not been sufficiently covered in the existing legislation.

As mentioned above, while the global commitments, such as the Paris Agreement are binding for the Mediterranean states, this has not yet been translated into direct Mediterranean level policies, like the EGD's EU Climate Law. Similarly, the ambitious EU climate related targets are not directly relevant, nor translated at the Mediterranean level.

For the EU Member States in the region, the upcoming EU Ocean Pact could bring further coherence among fisheries and biodiversity policies and their objectives (although climate change has not been discussed much yet), but since the Pact has not been unveiled yet, it is unclear to what extent it could deliver on this.

<sup>&</sup>lt;sup>2</sup> Mainstreaming is understood as the integration of key policy and societal goals and considerations across policies from different sectors. In CrossGov, the focus is primarily on mainstreaming of the EGD marine relevant objectives for biodiversity, climate change and pollution









#### Coherence attribute nr. 2: Policy Instruments

- All mechanisms that are put in place by the policy to achieve its objectives.
- Set of techniques that governments use, aiming at influencing the behavior of organizations or individuals in support of public objectives
- Typologies of policy instruments have been created<sup>3</sup>

For policies to be coherent:

- Alignment of policy instruments is considered beneficial for policy coherence.

1. Would / has putting the policy instruments into practice lead / led to results that are in accordance with 1) the policy's own objectives, 2) other policies' objectives, 3) the EGD (CrossGov specific) objectives

Both the Barcelona Convention and GFCM pass a number of policy instruments within their competence areas, but it has to be noted that their implementation is at the national level, with neither having strong enforcement mechanisms, similar to what the EU has, at their disposal.

Nevertheless, particularly the GFCM actions have led to 31% decrease in overexploited stocks across the Mediterranean in the last decade, which is an impressive achievement. GFCM has also established some new and in parts strongly protected Fishery Restricted Areas (FRAs), which are in the process of being recognized as OECMs (Other Effective Conservation Measures), thus contributing to their own objectives, Barcelona Convention objectives, and aligned with EGD objectives (FAO, 2023).

All that being said, a lot of work remains. More than 50% of Mediterranean fish stocks remain overexploited and only 50% of commercially exploited fish stocks have the assessments available. In terms of spatial protection, less than 10% of the whole Mediterranean Sea is currently protected (most of this in the northern Mediterranean), with estimates that between 1-3% of Mediterranean can be considered actually protected, the rest being paper parks, and only about 0.1% currently enjoys strict protection. This means that Mediterranean is quite far from achieving 30:30 targets. Additionally, the Mediterranean is warming and acidifying faster than the global average, while also suffering high degree of biological invasions through the Suez Canal and due to shipping traffic. The fact that the climate change policy is only now being develop, indicates that the progress is delayed already. Additionally, the Mediterranean is predicted to lose up to 40% of its winter precipitation, with this further drying likely to exacerbate social and geopolitical complexities in the region (Tuel & Eltahir, 2020). Despite marine ecosystem changes already being observed, climate change is only rarely considered operationally in EU MSPs (Marine Spatial Plans) and MSFD Programmes of Measures. While both the EU framework directives and IMAP are already intending to move away from sectorial management and working towards greater integration of climate change in both (interviews, FishForum), some would claim that MSP has the best potential to achieve that objective (Rilov et al. 2020). Yet, there remains a challenge in the operationalisation of sustainable development between the powerplays of maritime activities and conservation objectives (Rilov et al., 2020). The more and more common Mediterranean heatwaves impact species assemblages, which can experience long-term directional changes in functional identity, with consequences for ecosystem functioning. Heatwaves are mainly affecting taxa with large sizes, arborescent and massive morphologies, coloniality, high physical defences, slow-growing and long-lived, which often provide 3-D habitats for other species (Gomez-Gras et al., 2021, Pisaro et al., 2020). More than 90% of existing Mediterranean MPAs are characterised by high vulnerability to climate change, with only 5.7% exhibiting high and very high stability (Kyprioti et al., 2021). So, the current MPA network cannot guarantee the resilience against climate change and continued effectiveness. A particular challenge are thermophillic invasive alien species entering through the Suez Canal, with endemic, habitatforming species like Posidonia oceanica, being particularly vulnerable to being replaced (Beca-Carretero et al., 2024, Kyprioti et al., 2021). Additionally, since the Mediterranean is both a biodiversity and global climate change hotspot, it is projected that fish and other marine species will

<sup>&</sup>lt;sup>3</sup> Examples of typologies: <u>Economic</u> (taxes, charges, fees, fines, penalties, liability and compensation schemes, subsidies and incentives, deposit-refund systems, and tradable permit schemes); <u>Information</u> (state-of-the-environment reporting, impact assessments, labelling schemes, technical standards, education campaigns); <u>Legal</u> (licenses, permits, prescriptions, prohibitions, bans); <u>Compliance</u> procedures (including monitoring and reporting schemes); <u>Enforcement</u> procedures (litigation and access to justice).





shift their geographical distributions (already happening), leading to decreases in functional and phylogenic diversity (Moullec et al., 2022).

Additionally, some interviews have pointed to the fact that underneath the overarching policy coherence, the policy instruments do not show similar levels of coherence. It has to be noted that the information provided in this paragraph is somewhat contentious, with different interviews providing sometimes opposing views on the status of policy coherence among policy instruments. However, it has been pointed out that some of the vulnerable species that have been listed as protected under the SPA/BD Protocol (biodiversity protocol under the Barcelona Convention and administered by SPA/RAC) and that have associated agreed Action Plans passed under the Barcelona Convention since 2012, or that are listed on CITES Annexes, have not yet been given the same statuses under GFCM decisions and in fact some are still targeted and sold openly on fish markets (particularly some elasmobranch species). Furthermore, certain biodiversity Action Plans under the SPA/RAC's purview have not been considered yet at all within GFCM. Birds are generally well covered, as out of 30 bird species listed as needing protection under the SPA/BD Protocol, 24 are threatened by fisheries bycatch, with both GFCM and ICCAT having implementation decisions in place to address bycatch, with GFCM also specifically mentioning 5 bird species. Similarly, for 19 marine mammal species and 6 turtles, mentioned in SPA/BD Protocol are covered with relevant overarching bycatch decisions under GFCM and ICCAT. However, the picture is less ideal for fish species, as the SPA/BD Protocol protects 65 species, of which 56 are threatened by bycatch and out of those 34 also by tuna fisheries by catch. GFCM only addresses 10 of these fish species explicitly, while ICCAT covers 16, while also having an overarching decision for all elasmobranch bycatch. On this topic, ICCAT has a more pronounced focus on addressing elasmobranch bycatch, compared to GFCM. The other SPA/BD protected taxa are not relevant for ICCAT, as they are only threatened by bottom fisheries (and thus not tuna fisheries). However, out of 8 listed arthropod species, only 2 are covered by GFCM, while none of the 16 species of cnidarians, 11 species of molluscs, 2 echinoderms, 8 sponges, 1 bryozoan, as well as 7 plant and algae species that are threatened due to effects of bottom fisheries and recreational fisheries.

Some interviews pointed out that while GFCM considers a number of important biodiversity initiatives, many of them are rejected by contracting parties. The discrepancy between the same contracting parties committing to conservation action plans within Barcelona Convention and rejecting them within the GFCM's system has been attributed to the fact that different sectors at national levels are still not working together, and while the environmental authorities attend Barcelona Convention meetings, the fisheries authorities only frequent GFCM meetings and there is a disconnect then between the policy instruments adopted under each framework.

2. To what extent are spatial and temporal scales aligned between instrument of the different policies?

At the level of the whole Mediterranean, the international policy frameworks largely cover the same spatial scales and the strategic fisheries and biodiversity policies have been elaborated to cover the same temporal scale (up to 2030).

GFCM and ICCAT cover broader areas than the Barcelona Convention, which covers the entirety of the Mediterranean Sea and its coastal states. GFCM also covers Black Sea and its coastal states, while ICCAT further extends across the rest of the Atlantic Ocean.

The EU spatial scope is smaller and its policies cover the territorial waters and EEZs of the 8 EU Member States (Spain, France, Italy, Malta, Slovenia, Croatia, Greece, and Cyprus).

In terms of temporal scale alignment, there are some disconnects in reporting requirements under EU Directives, producing implementation document and in decision-making, which happens annually under GFCM and biannually under Barcelona Convention.

3. Do the instruments support the cross-fertilization of information and knowledge across policies with similar instruments?

Generally, this is at least nominally addressed at the level of the Mediterranean, as the data collected is generally aggregated through IMAP system and with the support of INFO/RAC and GFCM's fishery data is directly fed into this system too.





However, it should also be noted that based on a number of interviews, the quality of data in the Mediterranean is often poor, with instances of data being manipulated, non-reported, or simply non-existing, often linked to lacking funds to undertake extensive monitoring, particularly in the southern and eastern Mediterranean. On the other hand, quite a few interviewees pointed out that this argument can be used as an excuse for further inaction and that there is enough data available to start acting. Particularly, some of the EU level interviewees pointed out that there is considerable EU attention currently on the Mediterranean.

The information exchanges between the institutions are at least on paper set up, with Barcelona Convention, GFCM, and the EU working together and attending each other's meetings. However, the issue of different power relations between institutions should also be acknowledged, with socioeconomic sectors such as fisheries often finding themselves in privileged and more influential positions compared to environmental sectors.

An additional issue has been pointed out in terms of persisting silos, where fisheries data tend to be kept classified and not fully shared with other institutions and countries. Apparently, at the level of the EU there are positive developments on the way and the situation could get better in a few years, but sharing of data across sectors remains an issue at the Mediterranean level. There are even constraints to sharing data collected through Barcelona Convention with EU data repositories, as some of the non-EU states object to it.

The silos could also still remain, as for example on the issue of climate change, the different international organisations are setting up or have already set up their own climate change advisory networks, which operate within their confines with unclear connections with others. ICCAT has its own climate change expert group, GFCM established a climate change Task Force and is in the process of setting up its Expert Network on the topic, and Barcelona Convention has a functioning process producing MedECC reports on climate change in the Mediterranean (through Plan Bleu RAC) and is in the process of setting up a new climate change RAC. While these groups cover the same geographical area and often similar expertises (fisheries both in GFCM and ICCAT), there is no process for the groups to interact with each other, apart from through their overarching policy frameworks (Barcelona Convention-GFCM-ICCAT).

4. Do policies have shared implementation mechanisms (shared licensing, common indicators, shared monitoring frameworks)?

Barcelona Convention and GFCM follow their own decision and implementation patterns. Some integration has occurred, as Barcelona Convention's IMAP system includes fishing indicators that are aligned with MSFD's requirements (D3) and are being filled by GFCM, with close cooperation between SPA/RAC and GFCM being in place.

The extent of the integration and sharing of implementation mechanisms between specific policy instruments vary, depending if both frameworks adopt decisions on the same topics or not.

Given the chronic and often severe lack of funding at the level of the Mediterranean, a considerable part of the implementation is done through project work, which is supported either by the EU, World Bank, GES, international foundations (e.g., CEPF, MAVA Foundation) or national development agencies (e.g., GIZ, AFD), or philanthropists. On such projects, Barcelona Convention seems to work well with GFCM, producing joint and impactful results that are integrated into both frameworks (see MedByCatch and Depredation projects).

5. Do the policy instruments provide mechanisms to deal with conflicting objectives, incentives, etc.? In short, no, unless such mechanisms are provided at national levels, which are tasked with implementation of international policies, but analysis of national instruments and mechanisms was beyond the scope of this case study.





After evaluating the two Coherence Attributes (policy objectives and instruments), you are now requested to explore the three sets of Explanatory Variables that help explaining why a certain level of policy coherence is observed. If you found explanations that do not fit into any of these three categories, please document the information in the additional box provided at the end.

#### **Explanatory variable nr. 1: Governmental organizational structures**

- Structures (within/across local, regional and national authorities, EU and international organizations) that set the framework within which policies are formulated and implemented.
- These structures include the involved and responsible governmental organizations, their roles and responsibilities, their ability to address broader issues than their own "silo" issues, as well as their coordination mechanisms
- It plays a role in the level of coherence:
- Organizational behaviour and collaboration to overcome working in silos (e.g. coordination and collaboration within and across organizations<sup>4</sup>)
- Clear mandates aimed at overcoming barriers
- Clear responsibilities to work towards EGD objectives, and clear means to do so

1. Are the mandates and roles of governmental organizations governing a policy issue clearly defined (overlaps or redundancies)? How does this affect their involvement in policy formulation and implementation, and their collaboration with other organizations?

The roles of the institutions are clearly defined, but they do overlap.

Geographically, Barcelona Convention and its RACs overlap entirely with GFCM area of competence (only that GFCM extends further across the Black Sea too). Similarly, there is a geographical overlap across almost the entire Mediterranean (there are a few non-signatory countries) with ICCAT (International Commission for Conservation of Atlantic Tunas). The EU covers a subsection of the region, particularly the coastal, territorial, and EEZs of 8 Member States (Spain, France, Italy, Slovenia, Croatia, Malta, Greece, and Cyprus). Additionally, the legal system of Monaco is largely aligned with EU policies, while the areas of Bosnia and Herzegovina, Montenegro, Albania, and Turkiye are partly influenced by EU policies, given their accession status.

Thematically, the overlap becomes more complex.

- Barcelona Convention is the overarching Regional Sea Convention focusing on the environmental quality, with 7 Protocols (Dumping, Prevention and Emergency, Land-based Sources, Specially Protected Areas and Biological Diversity, Offshore, Hazardous Wastes, Integrated Coastal Zone Management).
- GFCM is an intergovernmental organization (Regional Fisheries Management Organisation
  – RMFO) under FAO and has a mandate to promote the development, rational management,
  responsible utilization and conservation of living marine resources, together with the
  responsible development of aquaculture
- ICCAT is an RMFO committed to maintaining tuna population at levels which permit maximum sustainable yields
- EU competence across its Member States and to varying degrees the accession states covers the exclusive competence over fishery management (Common Fisheries Policy – CFP) and shared environmental competencies (MSFD, Habitats & Birds Directives, Maritime Spatial Planning – MSP, EGD)

Clearly, the Barcelona Convention's and GFCM's mandates overlap when it comes to fisheries and conservation of living marine resources. They have a signed MoU between them to ensure their cooperation and division of Tasks. While this cooperation functions, there are some critics pointing out that the actual cooperation does not go far enough. While ICCAT and GFCM both cover fisheries, tuna and tuna-like species are under exclusive management of ICCAT. The two RMFOs cooperate and have recently also signed a Letter of Cooperation, but a deeper MoU was unsuccessful. On top of this, the EU competences intersect with all of the above. Within the EU waters, the EU policies functionally take precedence over the international policies, but the systems seem well integrated and aligned. The MSFD reporting and criteria are mirrored in IMAP, thus the Member States report same data twice into both systems and the policy instruments that they have to produce are integrated into both frameworks. Likewise, the CFP system is fully integrated with GFCM and EU

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<sup>&</sup>lt;sup>4</sup> Formalized processes such as the creation of supra- or lead institutions, inter-ministerial committees, joint task forces and decision-making bodies; or ad-hoc and informal coordination mechanisms.



maintains an active presence in ICCAT. Other interviewees have pointed out that the European Commission drafts a lot of the recommendations, which are then discussed at the GFCM, therefore representing a lot of the push for GFCM to adopt more decisions (a trend that can be observed over the years).

All interviews admitted that implementation of policies in the Mediterranean is challenging to say the least, due to the complexity of the region and a complicated geopolitical situation. Additionally, outside of the EU part of the region, the enforcement mechanisms are scarce. Therefore, numerous interviews pointed out that the Mediterranean functions based on cooperation, communication, and collaboration. There are numerous cases of best practices of such collaborations being very successful and could be further upscaled (e.g., MedByCatch and Depredation projects). Therefore, while this complexity and the need to establish such cooperations can be seen as hindering the policy implementation, others claim that the strength of the Mediterranean and its institutions is in this way of working. Additionally, several interviewees pointed out that the arguments of complexity in the Mediterranean, while not unwarranted, are blocking action and serve as a convenient excuse.

2. Which intra- and inter-organizational (formal and informal) coordination mechanisms are in place and how do they support coordination across policies?

Barcelona Convention and its secretariat (UNEP/MAP) and RACs work hard on coordination between different stakeholders and states, often with limited resources and very complex situations. They work actively on raising awareness of commitments, pushing for implementation, leveraging funds, and maneuvering between states to advance. This is done through different mechanisms.

- Bi-annual CoP supreme decision-making body
- Bureau rotating institution of 6 representative of contracting parties, led by a rotating 2 year presidency of one of the contracting parties
- MAP Focal Points review the progress and ensure implementation at national level
- Mediterranean Commission on Sustainable Development advisory body, forum for experience sharing and peer learning
- Compliance Committee

All these mechanisms are supposed to ensure implementation and coordination underneath the overarching, Mediterranean-level policies. Based on interviews, their effectiveness varies greatly between countries, policies, and initiatives.

GFCM is also composed of a number of different mechanisms:

- Commission
- Bureau
- Secretariat
- Scientific Advisory Committees on Fisheries and Aquaculture
- Compliance Committee
- Committee on Administration and Finance
- Working Group on the Black Sea
- A number of technical working groups

GFCM then engages with signatory states, as well as coordinates closely with Barcelona Convention (MoU) and ICCAT (Letter of Cooperation).

EU has integrated both the RSCs (incl. Barcelona Convention) and RMFOs (incl. ICCAT and GFCM) into its policies and their implementation (e.g., CFP, MSFD) and further works with them through fishery Advisory Councils, such as MEDAC. RSCs are also involved in CIS groups under MSFD.

3. Are spatial and temporal scales of governmental organizations well aligned and also fit-for-purpose for the relevant policy issues areas?

4. How does resource allocation within governmental organizations affect their ability to formulate and implement policies, and to collaborate with other organizations

Institutions interviewed all mention severe and chronic underfunding as one, if not the major, challenge for the implementation of policies. This was also openly discussed and presented in various sessions during the Fish Forum. Therefore, resource allocation is considered to have a commanding influence on the ability to implement policies. A clear example is the large funding gap on bycatch projects, since the MAVA Foundation ceased to exist and with it a funding source for this work went out. Additionally, for numerous Mediterranean states, not only "start-up" and project funding or loans are needed, but sustainable funding options, which can maintain the operations of actions or





infrastructure beyond the initial funding periods. Even on the EU level, while there have been successful mainstreamings and significant earmarking of funds for climate actions, these are not being fully used, due to persisting silos and governance issues in coordination of the use of those funds, particularly the European Maritime, Fisheries, and Aquaculture Fund (interviews). The urgency and political will for climate action at the EU level has not been fully translated yet onto the Mediterranean one (interviews).

5. How do political processes and power dynamics within and between governmental organizations affect their influence on policy formulation and implementation?

The political processes and power dynamics have a significant influence that has been often mentioned and discussed during the interviews. Clearly, the EU's influence is strong, both directly and indirectly. Despite representing a minority of Mediterranean states, the EU often sets the agendas of regional meetings and pushes for its policy goals to extend over the larger regional areas. Additionally, given the large economic dichotomy between the north of the Mediterranean basin on one side and the south and east on the other hand, further deepens this, as the EU needs to be kept satisfied, given that it is funding a significant amount of ongoing initiatives, alongside the relevant international organisations. As such, its influence is often described as driving both the GFCM and the Barcelona Convention. Although, some would also claim that the EU often exaggerates its influence beyond its actual reach. On top of that, the development aid provided by some EU countries and supporting their outreach further skews the power balance towards the EU. Additionally, the indirect influence of the EU is also recognized, with the passing of "internal" legislation that improves the status within the EU, while outsourcing some of its problems to "third" countries, which are often the ones around the Mediterranean (e.g., the issue of the export of European landfill waste to Turkiye).

The EU's power is thus clearly recognized, as well as the fact that it has a lot stronger and more direct enforcement mechanisms over its Member States and influence over the accession states. However, at the same time, some have claimed that it would be erroneous to assume that this approach would also work in the rest of the Mediterranean basin, where cooperation and collaboration are more highly prized.

The other power differential is apparent between different sectors, with fishery sector and its institutions being widely perceived as better funded, more influential, particularly in political waters. Therefore, the environmental goals are often a lot less influential in comparison. This divergence is apparent from national level to the EU to the Mediterranean level, with notes that CFP and GFCM prevail over environmental concerns and while they do collaborate with other institutions they are clearly more powerful and often, and potentially as a consequence, more effective.

However, even within this sector on its own, power dynamics vary, particularly if ICCAT and GFCM are compared. ICCAT enjoys the reputation of being very successful, particularly in bringing eastern bluefin tuna from the bring of extinction (Heffernan, 2014). Although, it does have to be noted that their challenges to get there were immense and that particularly high levels of political support and extremely high economic value of bluefin tunas helped the process. Thus, today, ICCAT and especially its work on bluefin tunas is very well funded, stringently monitored, and rigorously enforced, to the level that it is almost incomparable to the resources and functioning of GFCM.

Lastly, it has been mentioned time and time again, that implementation of policies in the Mediterranean is in the national hands and that there is limited influence over that in the hands of international organisations (with exceptions of ICCAT and the EU in its Member States). Therefore, national political processes also have clear influence over what is implemented and what is not. However, this study did not delve into the national implementation patterns, as that would be out of scope.





#### Explanatory variable nr. 2: Science-policy-society interface<sup>5</sup>

- Social processes that describe the role of knowledge production, transfer, and use in decision-making processes.
- It also refers to the actors involved as well as their roles within the different phases of the policy cycle.
- It plays a role in the level of coherence:
- the use of best available science and knowledge, from across different policy areas and actors, as a base for informed and coherent decisions
- 1. Are data and knowledge integrated or fragmented and how does this affect policy coherence? Example: Is data available and accessible to all actors of the SPS system? Are data gaps and uncertainty accounted for? Are interlinkages across sectors or governance levels well understood? Is data integrated across disciplines and policies? Is data covering relevant spatial and temporal scales to understand a policy problem.

Climate change data and knowledge are at this moment fragmented across different institutions and often the research institutions are still developing models and then testing them against real conditions. Barcelona Convention has produced an assessment in collaboration with Union for Mediterranean called MedECC, which synthesized the available scientific knowledge from the entire basin into an IPCC-style assessment for the Mediterranean. This knowledge is freely available and referenced across relevant high-level policies, but it does not include any raw data, given that it is entirely based on available publications. Data gaps and uncertainties are clearly presented in this report. The report comprehensively covers different data sources and both contributions and impacts on a variety of different sectors. This situation might get improved with the establishment of climate changed focused RAC in the next year and a half. There is a recognition of climate change as a significant threat to biodiversity and having an impact on Barcelona Convention policy framework, but while the monitoring of impacts on MPAs (marine protected areas) is not comprehensive, the assessments of potential impacts on the socio-economic systems are non-existent (Plan Bleu, 2020). Given that different climate change expert groups are being set up, it is likely that climate change data will remain fragmented for the foreseable future.

The fisheries-relevant data are reported by states to GFCM and in specific cases to ICCAT and into the CFP Data Collection Framework. The reporting of these data, with exception of tuna and tuna-like species (ICCAT) is the responsibility of the states, while monitoring within ICCAT is a shared responsibility between ICCAT, their contractors, and the states. The reported data to GFCM and CFP are then fully integrated into wider assessment frameworks of either the MSFD data frameworks or the IMAP. As such, the data flows are streamlined and widely available to all. The gaps in the data are acknowledged, with only about 50% of Mediterranean commercial fish stocks having enough data to be assessed (FAO, 2023). There has been a continuous decline in catches since mid 1990s (Piroddi et al., 2020, FAO, 2023). This considerable drawback is taken into account. The reporting and monitoring of depredation and bycatch occurrences is less standardized and the states often do not report on it systematically (based on interviews and existing infringement proceedings in a number of EU Member States currently). Additionally, some interviews have pointed to the issue of data being tempered with or not fully reported, which causes issues throughout the data system. Moreover, fisheries raw data is often not fully shared between states and institutions.

Biodiversity data is covered by reporting to MSFD and Habitats and Birds Directives, non-binding BDS in the EU Member States, as well as into the IMAP system at the scale of the entire Mediterranean. These data are then used to produce Quality Status Reports, Status of the Environment, Status of Nature assessments at both the EU and Mediterranean scales. While the quality and quantity of data at the Mediterranean level are improving (interviews noted a notable improvement from QSR 2017 to QSR 2023), there are still significant gaps across a wide variety of biodiversity elements, with some interviews pointing towards particular gaps in ecology and species behaviours and adaptation patterns. The effects of climate change are also already scrambling the trends and baselines that do exist. While these data are also available and accessible, the extent to which they are used in policies across different governance levels is variable.

<sup>&</sup>lt;sup>5</sup> This explanatory variable of SPSI sheds light on how stakeholders affect influence the production and transfer of knowledge; the explanatory variable of Stakeholder Involvement explicitly focuses on how stakeholders shape policy alternatives both during the formulation and design of policies as well as their implementation.



2. How do assessments affect policy coherence? Example: Are the assessments transparent? Which actors were involved in developing the assessments, and are some key providers of data and knowledge missing? Were cross-sectoral effects considered, also reflecting on other policy areas or environmental problems?

(this is difficult to answer properly as national policy developments, which should be impacted by the assessments have not been studied, so the text here is a reflection of the general trends identified by interviews)

The produced Mediterranean and EU level assessments are considered across states and other actors, but the exact level to which they affect policy coherence is difficult to assess. However, the assessments do consider the effects cross-sectorally. The relevant assessments from GFCM are, for example, integrated into the relevant Barcelona Convention assessments and discussed at their meetings. Thus, it could be expected that they do contribute to policy coherence across sectors and the fact that the overarching policies (GFCM 2030 Strategy and post-2020 SAPBIO) have been aligned indicate that this does happen. However, it has also been noted by interviews that GFCM's data is more taken on board by the Barcelona Convention, while the influence in the other direction is weaker, as exemplified by the fact that a number of strategic and action plans, backed by the assessments, from SPA/RAC have not been translated yet into the GFCM system.

The assessments are in general transparent and include a variety of different actors, while being coordinated with Mediterranean-regional bodies, usually relevant RACs of the Barcelona Convention (sustainable development and climate change – Plan Bleu, state of nature – SPA/RAC, QSR – UNEP/MAP, development and environment – Plan Bleu and UNEP/MAP) or the GFCM. Based on the data reported to the EU, the relevant EU institutions or their consultants also prepare the assessments of the Mediterranean EU countries and their waters (JRC, DG ENV, DG MARE, EEA).

The data informing the assessments includes fisheries data, socio-economic data, as well as variety of models and quantitative natural scientific data. The inclusion of social scientific, particularly qualitative data, is still rare. The assessments of potential impacts on the socio-economic systems are non-existent (Plan Bleu, 2020). Plan Bleu (2020) has recommended four indicators, with the first one linked to fisheries and their revenue per unit effort, while also believing that MPAs may play a vital role in understanding climate change impacts on economic and social systems.

3. How do models of knowledge transfer affect policy coherence? Example: Is knowledge production separated from policy-making (=linear) or is it based on a collaborative process? How well is society integrated in the co-production of knowledge? What are the transfer mechanisms in place?

This is difficult to asses at the level of the whole Mediterranean, as there are numerous parallel process taking place across a variety of governance levels. A very considerable part of data production and knowledge transfer is done at the national level and then reported to the Mediterranean level, thus the national processes vary widely between different countries. Some countries report a considerable externalization and fragmentation of efforts and focus, thus their knowledge production varies even between sub-national regions.

Based on discussions with different actors, most of them still subscribe to the linear model of knowledge transfer, as in the science and knowledge have to be produced for them to act on it. The same ideas are also publicly presented during events, such as the Fish Forum, where improvements in data and knowledge are in large part credited for the improvements that can be seen as a consequence of policies based on that new knowledge.

At the same time, particularly with fisheries there is a considerable focus on stakeholder engagement, working with fishers and co-producing knowledge, with numerous initiatives and projects ongoing or past. With this kinds of collaborations different actors from the NGO and research sectors join forces with relevant Mediterranean institutions (e.g., SPA/RAC and GFCM) to work with and coproduce fisheries knowledge with the fishers. Some such initiatives were also done on national levels, such as in response to dealing with blue crab invasion in Tunisia (Fish Forum). However, vast majority of knowledge for the assessments is still produced by scientific institutes and monitoring programmes.

The wider involvement of society into co-production of knowledge is again a national competence and varies from state to state.

4. What is the role of Permanent SPSI platforms on policy coherence? Example: Have formal or informal platforms been established? Are the relevant actors engaged and are the platforms covering





cross-sectoral dimensions of policies and facilitating coordination across policy areas and governance arrangements?

Some platforms have been established, such as MEDAC (Mediterranean Advisory Council for fisheries), which includes fisheries experts, as well as representatives of environmental NGOs, representatives of industry, and interest groups. Therefore, relevant actors from different sectors are engaged there and the Council facilitates discussions across sectors. Some would still claim it is dominated by fishing interests in its products, but it does involve also other actors.

Similarly, some of the interviews claimed that GFCM work on a similar principle of involving experts from different sectors and a wide array of stakeholders too. However, other interviews still characterized it as more sectorally coloured, with environmental authorities rarely engaging with GFCM, which is thus the platform for fisheries institutions.

Barcelona Convention's SPSI platforms are more sectoral and structured around MAP Focal Points and Focal Points for each of the RACs. These experts are nominated by different states, mainly the environmental authorities, and they meet with their counterparts from all Mediterranean countries, discussing the issues and the conclusions are then passed on to the UNEP/MAP levels and to the CoP. However, the sectoral chasm between the environmental sectors and the rest can still be apparent.

5. How does competence and understanding of the problem/subject-matter affect policy coherence? Example: Do actors in the SPS system have a shared understanding of the problem? Are training and capacity activities enhancing systemic understanding?

(This is again based on the inference from interviews and observations during the Fish Forum)

It seems that the basic understandings of the main problems are shared as the main challenges and successes have been well communicated and most stakeholders from different sectors are aware of them and are not disputing them. However, what is to be done about them is less coherent.

While the dire biodiversity situation is recognized by practically all actors, the support for expansions of spatial protection areas, with possible associated fishery closures, is extremely variable. From non-isolated calls for no spatial fishing restrictions in the Mediterranean, to full 30:30 implementation with 10% strict protection and effective management as absolute needs. Similarly, while all main institutions are committed to achieving 30:30, how to get there varies widely. Some count on mainly achieving the target with OECMs, within which the GFCM FRAs (Fishery Restricted Areas) would play the largest role. On the other hand, others, including GFCM, are only considering very select FRAs as potential OECMs, which would not contribute significantly towards achieving 30% protection, so expansions of MPAs would also be needed. But whether those MPAs should be established through a revision and rebuilding of the Natura 2000 network in EU Member States, offshore protected areas (and thus interactions with BBNJ Treaty), or other approaches.

The enlargement of MPA network is still aligned with all major policies, such as under the BDS 2030 (Kyprioti et al., 2021), GFCM Strategy 2030, and post-2020 SAPBIO, and together with CFP Joint Recommendations is seen as needed to increase resilience of the existing MPA network and to assure biodiversity conservation (Kyprioti et al., 2021, Katsanevakis et al., 2020). Management efforts should focus on minimising anthropogenic pressures to ensure the persistence of foundational, habitat-forming species, providing them with more time to adapt and resist invasive species (Beca-Carretero et al., 2024, Katsanevakis et al., 2020). Rilov et al. (2020) suggests application of systematic conservation planning in the MSP framework, which should also recognise the potential of some areas to serve as climate refugia (Katsanevakis et al., 2020). Going forward, there should be more of a consideration of how to make the process of using joint recommendations more straightforward and in the Mediterranean to link up this work with GFCM's efforts on FRAs, since the spawning areas are crucial to be protected, at least through temporal closures, if not through MPAs and OECMs to also contribute to EU and global biodiversity targets (30x30). The MPAs are particularly needed in offshore waters (Bellido et al., 2020, Piroddi et al., 2020, Plan Bleu, 2020, Pita et al., 2021, Katsanevakis et al., 2020). The focus should be on maintaining ecosystem functions and services, rather than focusing on single species (not just in fisheries management, Rilov et al., 2020).

Similarly, on climate change, there seems to be an overwhelming understanding that climate change is already having a pronounced effect on both fisheries and biodiversity and that these effects will

only become more pronounced. However, what is to be done about this remains unclear. There is a recognition of climate change as a significant threat to biodiversity and having an impact on Barcelona Convention policy framework, but while the monitoring of impacts on MPAs (marine protected areas) is not comprehensive, the assessments of potential impacts on the socio-economic systems are non-existent (Plan Bleu, 2020). Plan Bleu (2020) has recommended four indicators, with the first one linked to fisheries and their revenue per unit effort, while also believing that MPAs may play a vital role in understanding climate change impacts on economic and social systems. Additionally, MPAs can contribute to protection of blue carbon habitats and mitigating the impacts of climate-driven events (e.g., tidal surges, storms, waves, floods, Plan Bleu, 2020). However, the integration of biodiversity actions with climate actions has not happened yet systematically. Additionally, the Mediterranean is predicted to lose up to 40% of its winter precipitation, with this further drying likely to exacerbate social and geopolitical complexities in the region (Tuel & Eltahir, 2020). Despite marine ecosystem changes already being observed, climate change is only rarely considered operationally in EU MSPs (Marine Spatial Plans) and MSFD Programmes of Measures. While both the EU framework directives and IMAP are already intending to move away from sectorial management and working towards greater integration of climate change in both (interviews, FishForum), some would claim that MSP has the best potential to achieve that objective (Rilov et al. 2020). Yet, there remains a challenge in the operationalisation of sustainable development between the powerplays of maritime activities and conservation objectives (Rilov et al., 2020). The more and more common Mediterranean heatwaves impact species assemblages, which can experience longterm directional changes in functional identity, with consequences for ecosystem functioning. Heatwaves are mainly affecting taxa with large sizes, arborescent and massive morphologies, coloniality, high physical defences, slow-growing and long-lived, which often provide 3-D habitats for other species (Gomez-Gras et al., 2021, Pisaro et al., 2020).

Finally, on fisheries, the knowledge on the overexploitation of the Mediterranean is commonly held among the different actors. Despite a significant reduction of the overexploited stocks in the last decade, the way forward remains a bit unclear. While it seems that there is a clear direction towards further reductions of fishing pressures, towards more selective gears, etc., there are still open discussions on which kinds of fishery management plans would work best, which kinds of models to use in the background and how to proof them against climate changes. The Mediterranean specificity of fisheries management needs to be recognised. The regionalisation of fisheries policies in the Mediterranean has led to a different approach to managing fisheries to the Atlantic and Baltic Seas. The CFP/GFCM technical measures in the Mediterranean focus on the "input measures", which regulate the fishing fleets (e.g., time spent fishing, where and when to fish), rather than focusing on quotas ("output measures"). The issue with input controls is that while they are easy to measure as they occur before fishing, their enforcement happens at sea, which is challenging to properly implement. While the new EU Regulation 2019/1241 imposes new requirements to encourage Member States to submit joint recommendations for such input controls (e.g., fishery restricted areas), so that they can become EU Delegated Acts, this instrument is difficult and time-consuming to use and has thus not been used much (Bellido et al., 2020, WP2 deliverables). It is also important to note that most policy measures and European regulations are designed for single species fisheries, which does not work in the Mediterranean context of mixed fisheries, with more by-catch (Piroddi et al., 2020, Bellido et al., 2020, Florentino & Vitale, 2021).

While it may seem that the quota systems imposed in the Atlantic, Baltic, and tuna fisheries might work better, the Mediterranean demonstrates a high diversity both in species targeted and fishing patterns, with a vast geographical dispersion of landing sites, therefore the "input controls" are more implementable and potentially more enforceable (Bellido et al., 2020, Florentino & Vitale, 2021). But there needs to be more focus on enforcement and surveillance, where lessons from ICCAT might come in handy (Bellido et al., 2020, CrossGov case study research, ICCAT REF, Piroddi et al., 2020). This is particularly important as bycatch needs to be better managed in the Mediterranean mixed fisheries, with elasmobranchs remaining at high extinction risk, and no signs of improvements (Katsanevakis et al., 2020, Ramirez-Amaro et al., 2020). Florentino & Vitale (2021), conversely, argue that for small pelagics and deep water red shrimp, the adoption of quota management system would work better. Some drastic solutions of reducing the fishing effort between 50 and 80% to reverse the effects of overfishing were also proposed, but the socioeconomic costs of that would likely be too high (Florentino & Vitale, 2021).





5. How does funding and resources affect policy coherence? Example: Are funding and resources allocated in a way that supports the production and transfer of relevant knowledge across governance arrangements?

As already mentioned above, funding and resource allocation is arguably the main challenge at the Mediterranean level. The lacking funding available stymies the knowledge production efforts mainly, while the processes for knowledge transfer exists in the form of existing portals and data repositories. The funding issue goes beyond the lacking funds for Mediterranean level institutions to the fact that experts from the Mediterranean south and east have less opportunities for engaging in international projects and exchanging knowledge and skills than experts from the Mediterranean north.

Given that it was noted that GFCM is in general better funded than the Barcelona Convention, on the basis of it dealing on socio-economic and profitable issues, this has been linked to it being more effective and better at translating the available knowledge into governance arrangements.

Therefore, while high-level policy coherence has been achieved, in numerous cases because of the provision of EU funding for these purposes, particularly to the Barcelona Convention system, the effects lacking finances for the policy instruments underneath the overarching policies remain an issue and it limits their effectiveness, follow up, and support that can be offered to the states, that are often struggling themselves with other development issues.





#### Explanatory variable nr. 3: Stakeholder involvement<sup>6</sup>

- Manner in which stakeholders influence policy framing, design and implementation through participatory processes and other avenues such as information campaigns and lobbying, and how this affects coherence across policies. It plays a role in the level of coherence:

- Inclusive, participatory mechanisms that enable active exchange across a broad set of actors and interests, are more likely to have a stronger contribution to coherence than processes involving few interests that may be typical "clients" for one sector only
- Involvement of different stakeholders in policy making and implementation processes enables integration of different information, knowledge, values and ideas and fosters agreement and buy in across different interest groups

1. To what extent does stakeholder involvement affect policy choices during design and implementation, and how does this impact coherence across policies?.

Stakeholder involvement is actually a bit tricky at the Mediterranean level, as it is a large international are, therefore carrying out stakeholder involvement activities at that level is challenging to say the least.

Within Barcelona Convention, the assumption is that the MAP Focal Points will run through those processes on a national level on their own and then come to report and represent those views at the level of the Convention or Protocol-related meetings. The Regional Activity Centres and the Secretariat take part in a number of initiatives, events, and projects (either as part of the Advisory Bodies or full partners), where they get in direct contact with stakeholders, but this is less standardized.

GFCM is more stakeholder oriented and, according to some interviews, much better than the Barcelona Convention on this topic. Their framework requires direct collaboration with national fishery stakeholders, interest groups, as well as with researchers and environmental NGOs, thus arguably representing the whole spectrum of sustainability viewpoints (economic, environmental, and social). Although some critics would also point out, that GFCM can be quite good at managing the economic and social components, while its engagement with environmental topics is often softer.

There exist a number of advisory and other bodies, which can represent some stakeholder involvement, such as MedPAN (network of MPA managers), MEDAC (Mediterranean fisheries Advisory Council), etc. These institutions are actively involved in the Mediterranean-level processes and represent the views of their stakeholder groups.

The exact influence of different stakeholder groups onto policy formulation and implementation is difficult to assess due to the fragmented nature of how stakeholder processes are run and differences between different governance scales (national, EU, Mediterranean level).

2. In how far are formal and informal stakeholder involvement mechanisms at different stages of the policy cycle aligned across policies?

As mentioned before, this is difficult to assess at the Mediterranean level, as most stakeholder involvement mechanisms are national processes and thus beyond the scope of this case study. At the Mediterranean level, it seems that institutional stakeholders across sectors are well included into the relevant engagement processes, and high-level policies have been made coherent across sectors. However, this is not always fully translated into the underlying policy mechanisms where it seems different groups of stakeholders continue to engage under the sectoral policies, resulting in the situation where decisions from one sector are not translated into another sector, causing policy incoherence between policy instruments.

3. In how far do participatory processes (e.g. stakeholder platforms) in the process support the involvement of stakeholders across different policy areas/sectors?

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<sup>&</sup>lt;sup>6</sup> This explanatory variable of Stakeholder Involvement explicitly focuses on how stakeholders shape policy alternatives both during the formulation and design of policies as well as their implementation. the explanatory variable of SPSI sheds light on how stakeholders affect influence the production and transfer of knowledge.





As before, most participatory processes are organized on national levels and thus beyond the scope of this case study analysis.

Among the expert, technical, and working groups established under the sectoral policies it seems that the same or similar stakeholders are involved in Barcelona Convention's processes and EU MSFD and Habitats and Birds Directives, with some overlap also with MSP Directive. On the other hand, some MSP experts also engage with GFCM, which has its own expert, technical and working groups set up, which include people working also on ICCAT and CFP, but there is limited direct overlap with the Barcelona Convention's experts. Thus, a sectoral difference persists and presents a barrier for involvement of stakeholders across different policy areas and sectors.

4. Are the consultation/participatory processes inclusive, fair, and equitable ensuring contributions of all relevant stakeholders or do power imbalances mean that contributions are biased towards certain stakeholders?

That is difficult to assess, as many of this process are done on the national level and vary from country to country.

Based on the insights from interviews, a number of them claimed that GFCM stakeholder processes were inclusive, effective, collaborative, and would integrate a variety of different views well. Others claimed that a clear predominance of more powerful fishing lobby or institutions would prevail in them, thus biasing the outcomes (or perhaps that is to be expected in a fishery-oriented institution).

The fact that quite a clear division of interest groups and relevant institutions is present between Barcelona Convention and the GFCM, it could be claimed that all relevant actors and stakeholders are only very rarely all around the same desk.





Additional explanatory information	
1. The additional explanatory information in 2-3 sentences.	
2 The additional explanatory information in 2-3 sentences	
The additional explanatory information in 2-3 sentences	