CrossGov

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

Policy Coherence Roadmaps

Deliverable 4.1

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Abstract	Three sectoral roadmaps for improved marine policy coherence are presented on Offshore Wind Energy, Agriculture Pollution and Fisheries. Each roadmap presents reccomendations to improve policy coherence.
Keywords	European Green Deal, EU Biodiversity Strategy, Marine Strategy Framework Directive, Renewable Energy Directive, Common Agricultural Policy, Sustainable Fisheries, Common Fisheries Policy

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Executive Summary

Deliverable 4.1 – Policy Coherence Roadmaps presents three sectoral roadmaps - Offshore Wind Energy, Agriculture Pollution and Fisheries - for improved marine policy coherence in the European Union. Each roadmap highlights the challenges of aligning sector-specific policies with overarching EU environmental objectives, particularly those outlined in the **European Green Deal** and the **EU Biodiversity Strategy for 2030**.

1. **Offshore wind energy**: As offshore wind plays a central role in the EU's renewable energy transition, this roadmap explores its ecological impacts and the policy frameworks that are impacting the growth and design of the sector. Based on cases from the North Sea, it provides actionable recommendations to better align renewable energy expansion with marine biodiversity goals.
2. **Agriculture pollution**:
   Focusing on nutrient pollution from agricultural runoff, this roadmap examines coherence across the Common Agricultural Policy, the Water Framework Directive, and the Marine Strategy Framework Directive. Examining cases in the Baltic and North Sea, the roadmap proposes steps to improve coherence of agricultural and environmental policy to mitigate marine nutrient pollution.
3. **Fisheries**:
   The roadmap analyses policy coherence between the Common Fisheries Policy and marine biodiversity policies. It identifies key implementation challenges stemming from differing legal mandates and governance structures. Drawing on case studies from the Mediterranean Sea, it recommends actions to improve coordination and policy coherence, aiming to support both sustainable fisheries and healthy marine ecosystems.

Overall, the CrossGov Policy Coherence roadmaps underscore the need for improved policy coherence across sectors to safeguard marine biodiversity while pursuing economic and social goals. Practical recommendations include improved spatial planning, stronger inter-governmental collaboration, early and integrated environmental assessments and more inclusive stakeholder engagement. Together, these strategies aim to foster a more sustainable and resilient marine environment across the European Union.

Digital Presentation of the Roadmaps

The CrossGov Policy Coherence Roadmaps have their own **landing page** on the CrossGov website (URL: https://crossgov.eu/roadmaps/). On this page users can find a short description of each roadmap and either read the documents online or download them as a PDF. The webpage was built to support the dissemination of the roadmaps to key stakeholders, namely policy makers at the EU, regional seas and national levels, as well as among representatives of NGOs and think tanks.

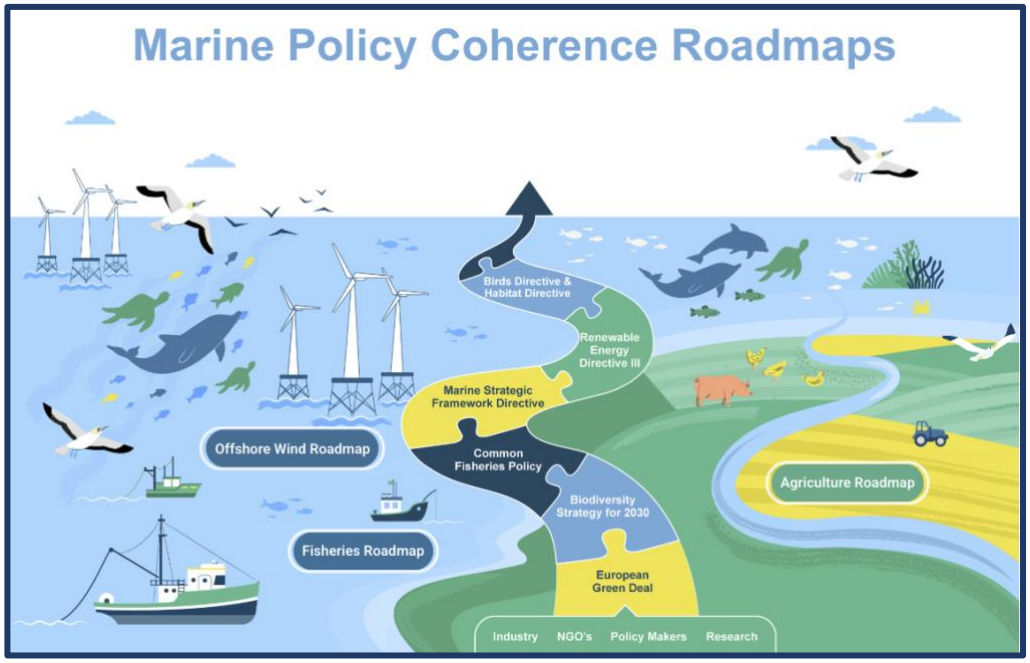


Figure 1: Screenshot from Roadmaps landing page on the CrossGov website.

Method for the Development of the Roadmaps

The CrossGov Policy Coherence Roadmaps were developed based on the research and findings from work package one, two and three in the CrossGov project. Specifically, the roadmaps integrate the mappings and research findings from research on both European Union level policy and nation level implementation (through the case study work).

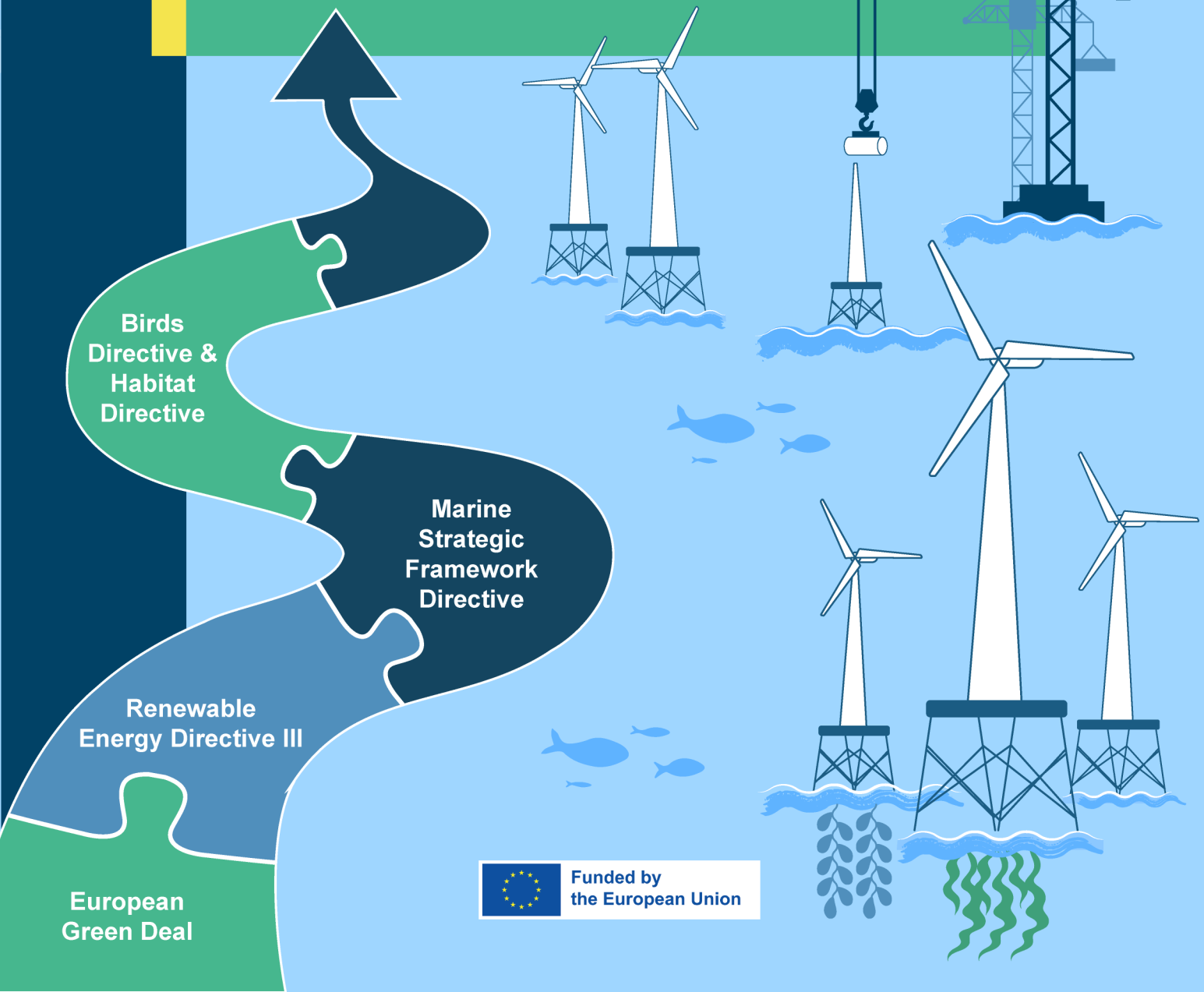
Stakeholder Engagement

Research within each CrossGov work package, relied on input from relevant stakeholders through events, workshops and interviews, among other methods. Further, the Offshore Wind and Biodiversity Roadmap was discussed with approximately 60 relevant stakeholders at the Blue Mission BANOS Mission Arena in Amsterdam in November 2024. A summary of that workshop can be found here. The Fisheries and Biodiversity Roadmap was similarly the subject of an online workshop in April 2025 with approximately 35 relevant stakeholders. A summary of that workshop can be found here. Findings from the Agriculture Pollution Roadmap were similarly discussed in Riga, Latvia at the BlueMission BANOS 2nd Mission Arena in April 2024. A summary of that workshop can be found here.

Offshore Wind Energy & Biodiversity Protection

Roadmap to Enhanced Policy Coherence

CrossGov



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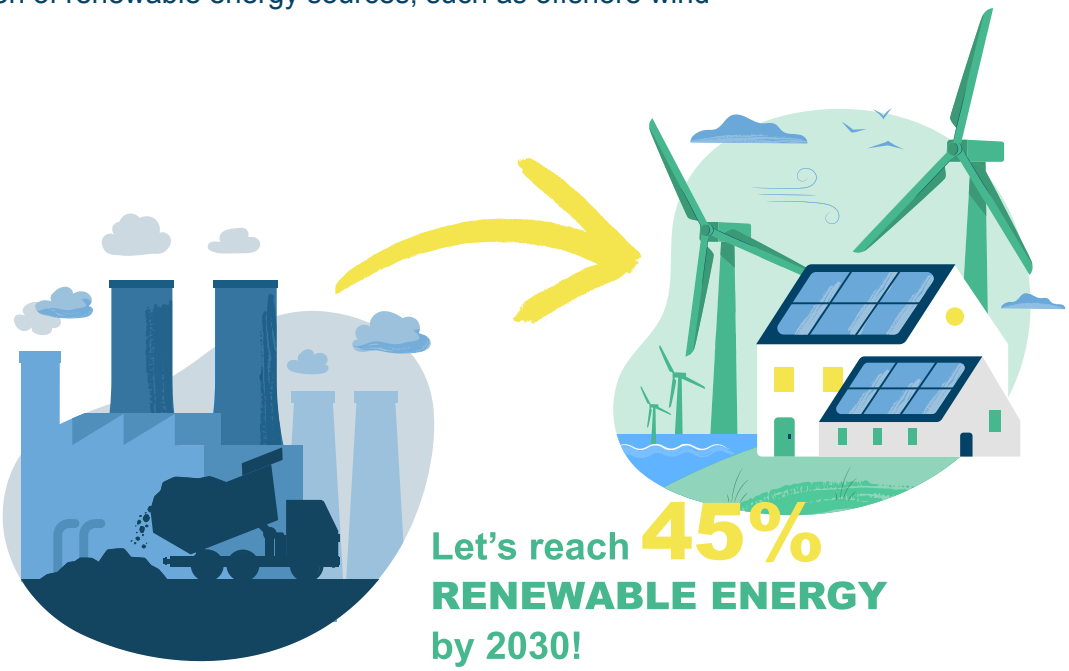
Roadmap Summary

Offshore wind energy plays a crucial role in the European transition to renewable energy, with many countries setting ambitious targets under the **European Green Deal**. However, the expansion of this sector impacts marine ecosystems, which are already under pressure from climate change and other human activities. This roadmap outlines recommendations to enhance coherence between offshore wind energy development and marine biodiversity protection. It identifies barriers such as fragmented governance, inconsistent environmental assessments, and limited stakeholder engagement. Drawing on the experiences of Germany, the Netherlands, and Norway, it underscores the misalignment between renewable energy targets and biodiversity conservation policies, which often operate independently.

This roadmap examines key European policies, including the **Renewable Energy Directive III**, the **European Union Biodiversity Strategy for 2030**, and the **Marine Strategy Framework Directive**. These policies offer a framework for aligning offshore wind energy expansion with biodiversity goals, but better policy coherence in practice is needed. By emphasizing improvements to marine spatial planning, early-stage environmental assessments, and inter-agency coordination, the roadmap provides practical guidance to ensure that the development of offshore wind energy aligns more effectively with marine biodiversity objectives in the European Union

A The European Green Deal's dueling priorities: Renewable energy & marine ecosystem protection

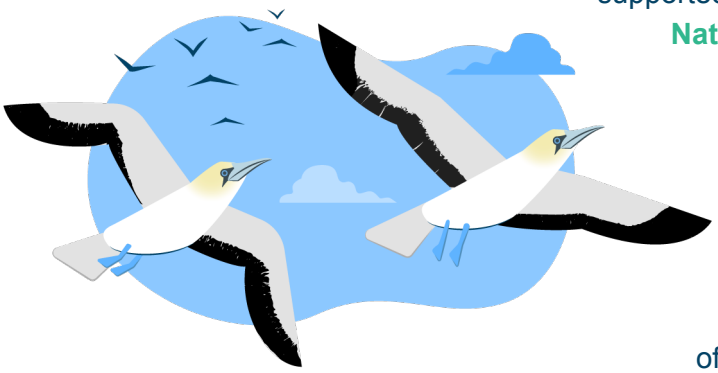
The **European Green Deal** marks a dramatic shift from market-driven energy policies to an environmentally integrated approach to energy generation, with the aim of achieving climate neutrality by 2050. This transformation is part of delivering the European Union's (EU) vision of a European society and economy that thrives while reducing greenhouse gas emissions and protecting the environment. The Green Deal's energy policy centers on two key pillars: (1) decarbonization and (2) advancing the transition to clean, secure, and affor able energy. A key part of this transition is the expansion of renewable energy sources, such as offshore wind



The **European Green Deal** also highlights biodiversity as essential to a healthy, prosperous, and sustainable Europe. Scaling up renewable energy is vital but must be carefully planned to avoid harming marine biodiversity. As the EU moves from fossil fuels to renewable energy, including offshore wind, embedding biodiversity protection in this transition is crucial for long-term sustainability. To deliver the ambitious climate and biodiversity goals of the Green Deal, the EU has put in place a range of policies and strategies aimed at biodiversity protection and ecosystem restoration as well as accelerating the deployment of renewable energy. The following sections outline key policy instruments that drive these two Green Deal priorities.

Ambitions to protect biodiversity

The **EU Biodiversity Strategy for 2030** aims to restore, protect, and enhance resilience of ecosystems by 2050, with key milestones for 2030. These include protecting 30% of the EU's land and sea areas, with at least one-third of them under strict protection and restoring degraded ecosystems. The strategy also aims to minimize the impact of activities like fishing and resource extraction on sensitive habitats, particularly the seabed. The Biodiversity Strategy for 2030 is implemented through a series of directives and regulations. The **Habitats and Birds Directives** aim to secure favorable conservation status for selected species and habitats, supported by the Natura 2000 network. Additionally, the **Nature Restoration Regulation (2024)** requires restoration of at least 20% of marine ecosystems by 2030 and all degraded marine ecosystems by 2050. While the **Marine Strategy Framework Directive** provides a broader framework for conserving marine environments, addressing issues such as sea-floor integrit , biodiversity, and underwater noise are critical concerns for offshore wind development.



Ambitions to expand renewable energy generation

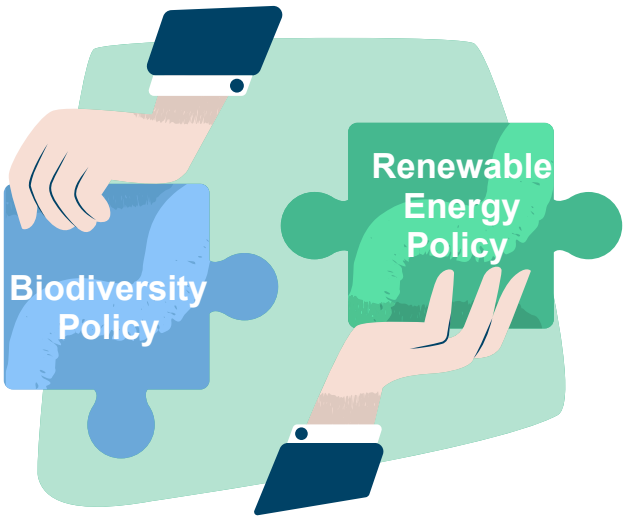
The **European Climate Law**, which writes into law the Green Deal's climate neutrality goals, mandates climate neutrality by 2050, with interim goals for 2030 and 2040. To achieve these targets, the **Renewable Energy Directive III** sets a legally binding obligation for 42.5% of energy consumption in the EU to be from renewable sources by 2030. The Directive introduces numerous measures aimed at streamlining and simplifying designation and licensing processes. These measures include establishing renewable energy acceleration areas with simplified environmental impact assessments, setting time limits for project permitting, classifying renewable energy projects as projects of overriding public interest, and granting exemptions under the **Habitats and Birds Directives** to fast-track projects. Offshore wind is intended to play a central role in the expansion of renewable energies in the EU, with the aim of generating 60 gigawatts of offshore wind energy by 2030.

B Offshore wind expansion and biodiversity protection: Are these goals at odds?

Balancing offshore wind expansion with biodiversity protection is increasingly complex. While energy targets—such as the aim of generating 60 gigawatts of offshore wind energy by 2030 —are often legally binding and measurable, biodiversity goals tend to lack enforceable targets, making them harder to implement. This imbalance can create conflicts, particularly where wind energy projects overlap with sensitive marine ecosystems.

Offshore wind farms impact marine biodiversity by altering the sea floor, posing collision risks to seabirds and bats, disturbing marine mammals through construction noise, and affecting migratory species due to transmission cable magnetism. These farms are often located on shallow banks, which are biodiversity hotspots. The long-term, cumulative ecological impact of expanding offshore wind across European seas remains unclear.

As offshore wind energy grows and competition for marine space intensifies, careful planning is essential to balance energy and conservation goals. While offshore wind is vital for reducing emissions and enhancing energy security, it must be strategically regulated to minimize environmental impacts. For example, EU Member States have begun using marine spatial plans under the **Maritime Spatial Planning Directive** to identify suitable sites for offshore wind parks. Further, **Strategic Environmental Assessments** and **Environmental Impact Assessments** are used as instruments to integrate ecological and social considerations into development decisions. These policies and tools are essential for aligning renewable energy growth with marine biodiversity protection.



C Policy coherence at the EU level

Ensuring policy coherence is crucial for aligning renewable energy expansion with marine biodiversity protection. The question is, how coherent are the relevant policies?

Ensuring good environmental status of marine ecosystems in planning

The **Marine Strategy Framework Directive** sets out a framework to ensure that good environmental status of marine ecosystems is achieved. Meanwhile, the **Maritime Spatial Planning Directive** aims to coordinate offshore wind expansion with other uses of ocean space. However, the Maritime Spatial Planning Directive does not explicitly reference the Marine Strategy Framework Directive. As a result, when Member States use maritime spatial plans to allocate space for offshore wind, there is a risk that ecological limits defined by the good environmental status are overlooked. In practice, maritime spatial plans have often been used to promote economic growth and prioritize sectoral development—particularly renewable energy—rather than to balance energy expansion with biodiversity conservation.

Offshore wind acceleration & the role of exemptions

The **Renewable Energy Directive III** introduces exemptions from environmental impact assessments to accelerate permitting for renewable energy projects, reducing environmental safeguards. The Directive establishes “renewables acceleration areas” in which strategic impact assessments at the planning level can be used to permit renewable energy developments without individual environmental impact assessments at the project level. However, this exemption from project level environmental impact assessments is at odds with the prevention principle under article 191(2) of the **Treaty on the Functioning of the European Union** and the commitments to achieve good environmental status under the **Marine Strategy Framework Directive**.

The **Renewable Energy Directive III** further introduces a single permitting procedure, classifying offshore renewables as being of overriding public interest. This allows projects, both inside and outside of acceleration areas, to proceed despite their potential environmental impacts on Natura 2000 sites or protected species, provided that appropriate compensation or mitigation measures are put in place.

Streamlining permitting processes for offshore renewables is necessary for achieving the Green Deal climate targets. At the same time, acceleration at the cost of environmental safeguards risks undermining biodiversity objectives by allowing projects to proceed despite significant uncertainty both about their environmental impacts but also about the effectiveness of mitigation measures.

D Policy coherence at the national level

Germany

Germany aims to reach 30 gigawatts of offshore wind capacity by 2030, 40 gigawatts by 2035, and 70 gigawatts by 2045. These targets were set in 2022–2023 to speed up the energy transition. As of late 2024, capacity stands at 9.2 gigawatts with 1,639 turbines in the North and Baltic Seas. Achieving the 2030 targets will require rapid expansion over the coming years. Germany has a structured policy and planning framework in place to guide this expansion while addressing biodiversity goals.

Key policies, planning instruments & tools

- **The Offshore Wind Energy Act**: The core legal framework for Germany, setting binding targets and regulating site planning, auctions, and permitting of offshore wind. The framework mandates the Federal Maritime and Hydrographic Agency to regularly issue a Site Development Plan that designates specific offshore areas and grid connection schedules to meet the expansion targets. While full transposition of the Renewable Energy Directive III is pending, the 2023 amendment of the Offshore Wind Energy Act anticipated the policy and includes acceleration areas for streamlined permitting.

- **The Environmental Impact Assessment Act**: Transposes the Strategic Environmental Assessment Directive and the Environmental Impact Assessment Directive, ensuring strategic and project-level environmental assessments. While Environmental Impact Assessments are simplified in acceleration zones, Strategic Environmental Assessments remain mandatory.

- **Federal Nature Conservation Act & Federal Water Act**: Transposes key EU environmental directives, including the Habitats, Birds, and Marine Strategy Framework Directives, into national law. These laws support the EU Biodiversity Strategy's objectives, including the 30% protection goal.

- **Spatial Planning Act**: Transposes the Maritime Spatial Planning Directive. Germany's 2021 maritime spatial plan designates space for energy, shipping, fishing, and conservation. While the plan designates new areas to support offshore wind expansion, it has been criticised for insufficiently integrating biodiversity needs.

Germany's mature offshore wind sector and integrated legal framework offer important insights for other countries. However, the rapid pace of expansion poses ongoing challenges, particularly around assessing and mitigating the cumulative environmental impact.

Barriers to reconciling biodiversity and offshore energy targets

- **Siloed organisational structures**: Offshore wind, permitting, and environmental policy are handled by separate ministries and agencies, which reinforces siloed approaches that prioritise sectoral mandates over integrated planning. The Federal Agency for Nature Conservation can object to plans that affect protected areas, but coordination remains weak

- **Ineffective science-policy interface**: Germany has a significant amount of scientific monitoring and research on offshore wind – for example, every project must conduct environmental monitoring (birds, marine mammals, benthos). The challenge is ensuring that this knowledge feeds back into policy and planning. One issue has been the slow incorporation of cumulative impact assessments into planning decisions.

- **Ineffective stakeholder involvement**: While formal mechanisms like consultations, advisory forums, and NGO-industry dialogues exist, they are often seen as ineffective. Stakeholders are involved in offshore wind development through formal consultations, advisory forums and industry-NGO dialogues. Stakeholder input, particularly from environmental groups, is not always reflected in final decisions.

What can other countries learn from Germany?

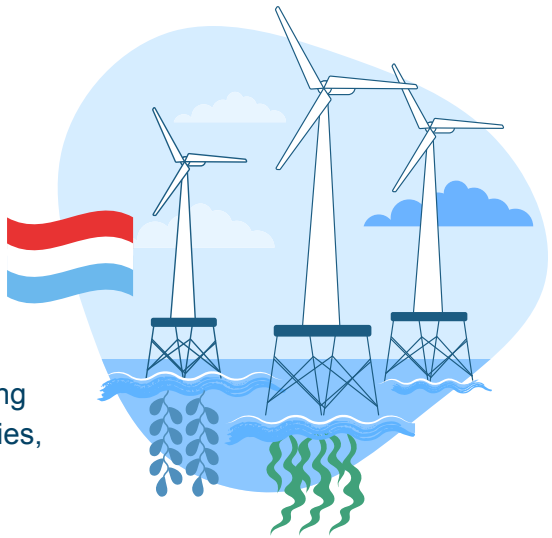
- **Clear legal frameworks and ambitious renewable energy targets**: Germany's approach shows how binding offshore wind targets combined with planning tools such as the Site Development Plan can accelerate offshore wind deployment while embedding essential environmental safeguards.

- **Integrating biodiversity into maritime spatial plans**: Germany's maritime spatial planning process is criticised for failing to integrate biodiversity objectives effectively, treating them as secondary to economic and energy priorities. Other countries could learn from this experience by effectively integrating biodiversity objectives into their marine spatial plans.

- **Enabling an effective science-policy interface**: Data collection alone is not enough. Germany's case shows the need for mechanisms that ensure environmental monitoring directly informs planning. This includes better data sharing, feedback loops into decision-making, and tools to evaluate cumulative and long-term impacts.

- **Improved stakeholder participation and transparency**: Germany's experience underscores the importance of meaningful stakeholder participation. Key improvements include clear feedback mechanisms, early and continuous engagement, and balanced representation of environmental and energy interests throughout the process.

The Netherlands



The Netherlands aims to expand its offshore ind capacity to 21 gigawatts by 2032, 50 gigawatts by 2040, and 70 gigawatts by 2050. The Dutch strategy is to integrate marine spatial planning, environmental assessments, and nature-inclusive design to balance energy production with biodiversity conservation. A key aspect of this strategy is the adoption of multi-use approaches, combining offshore wind with aquaculture and marine restoration, while ensuring strong stakeholder collaboration between governmental agencies, industry, and environmental groups.

Key policies, planning instruments & tools

- **North Sea Programme 2022-2027**: The Dutch marine spatial plan designates specific wind farm zones to minimize overlap with ecologically sensitive areas and integrates nature restoration measures alongside wind development to enhance marine ecosystems. This includes habitat restoration for species affected by fishing and other activities to strengthen biodiversity within and outside wind farms.

- **Strategic Environmental Assessments, Appropriate Assessments, and the Framework for Assessing Ecological and Cumulative Effects (KEC)**: These frameworks are used to evaluate wind farm environmental impacts. Research under programs like Wind op Zee Ecologisch Programma complements these assessments and drives innovation in biodiversity impact mitigation and restoration.

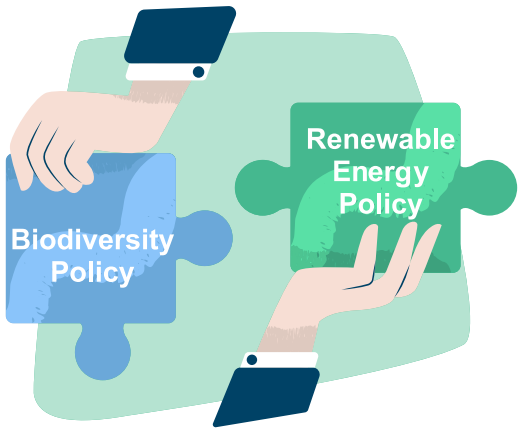
- **Nature-inclusive design and multi-use strategies**: The Netherlands promotes nature-inclusive designs that attract marine species and multi-use strategies that incorporate wind farms with aquaculture. Ecological criteria are now part of tender procedures, incentivizing developers to adopt biodiversity-friendly approaches.

- **Stakeholder engagement**: A hallmark of the Dutch approach is its emphasis on stakeholder engagement bringing together government agencies, environmental organizations, and industry players (e.g., North Sea Consultations and Community of Practice North Sea) to foster synergies between offshore wind development and marine ecosystem enhancement

The Dutch approach is notable for its emphasis on bringing various stakeholders together and creating synergies between offshore wind and marine ecosystem enhancement. This integrated strategy could serve as a model for other countries seeking to balance energy production with biodiversity protection.

Barriers to reconciling biodiversity and offshore energy targets

- **Limited influence of Strategic Environmental Assessments in early-stage site selection**: Decisions are often made before understanding comprehensive ecological impacts, particularly regarding cumulative and cross-boundary effects
- **Prioritization of renewable energy targets over biodiversity**: Mitigation or compensation measures are often used to replace preventive strategies for biodiversity protection.
- **Institutional fragmentation**: Multiple ministries with divergent priorities create inconsistencies in planning and permitting processes, hindering integrated, ecosystem-based management.



What can other countries learn from the Netherlands?

- **Integrated marine spatial planning and a one-stop-shop permitting systems**: Both processes emphasise the importance of early and coordinated stakeholder engagement to reconcile competing interests.
- **Transparent and collaborative decision-making**: Regular consultations, such as the North Sea Agreement, foster collaboration in decision-making among diverse sectors.
- **Inclusive stakeholder approach**: Combining sector-specific expertise with transboundary coordination offers a blueprint for enhancing coherence between environmental safeguards and energy objectives.

Norway

Norway, a newcomer to offshore wind, awarded its first 1.5 gigawatt capacity area in March 2024, with a target of 30 gigawatts by 2040. The country uses Strategic Environmental Assessments and Environmental Impact Assessments to evaluate environmental impacts before project approval. While well-positioned due to its vast marine areas and offshore ndustry expertise, balancing wind expansion with marine conservation is challenging, particularly for areas beyond territorial waters, where no biodiversity protection legislation currently exists.

Key policies, planning instruments & tools

- **Offshore Energy Act**: This act is the cornerstone of Norway's regulatory framework for offshore renewable energy production and stipulates that before the government can open an area, a Strategic Environmental Assessment must be conducted. Based on this assessment, a smaller sub-section can be opened and issued for a tender process. Once an area is awarded, the developer must conduct a project-specific Environmental Impact Assessment, which must be approved before a concession is granted.

- **Cross-sectoral process for site identification**: The identification of suitable areas is done through a cross-sectoral process that considers wind conditions, technical suitability, environmental conflicts, and impact on fisheries

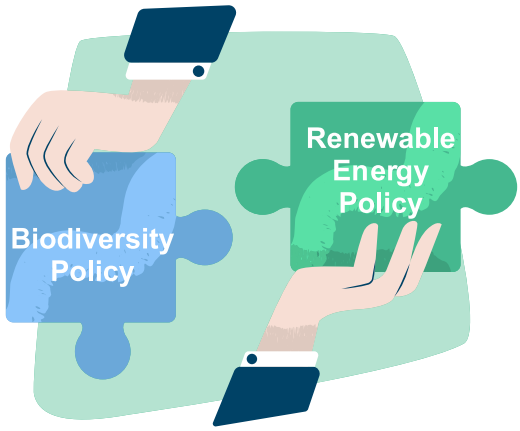
- **Integrated ecosystem-based ocean management plans**: These plans provide a framework for knowledge development and decision-making and include "particularly valuable and vulnerable areas".

- **The Nature Diversity Act**: It mandates that any activity must consider their impact on biodiversity and ecological processes; it emphasizes the precautionary principle, ecosystem-based management, and the need for scientific knowledge in decision-making. It allows to implement marine protected areas, though only in territorial waters. New legislation is currently under development to allow the implementation of marine protected areas beyond territorial waters.

Norway is taking a cautious, site-focused approach to offshore ind, prioritizing areas with minimal conflicts and elying on Strategic Environmental Assessments. However, the lack of established biodiversity protection laws creates regulatory challenges. As legislation evolves, ongoing research, monitoring, and adaptive management will be key to shaping a sustainable offshore wind secto .

Barriers to reconciling biodiversity and offshore energy targets

- **Limited alignment of offshore wind and ocean management plans**: There is a lack of clear guidelines on how offshore wind energy planning should relate to ecologically sensitive areas
- **Limited focus on cumulative and transboundary impacts**: The area-based approach of Strategic Environmental Assessments limits the ability to assess broader ecological effects
- **Limited focus of Strategic Environmental Assessments and Environmental Impact Assessments**: These assessments primarily focus on immediate impacts and mitigation measures, often overlooking broader environmental goals like restoration and nature-inclusive designs.



What can other countries learn from Norway?

- Strategic Environmental Assessments play a central role in the early stages of offshore wind energy governance and serve as potentially powerful tools in the planning process, delivering detailed information and identifying knowledge gaps and needs.

E Key factors limiting policy coherence

The cases of Germany, the Netherlands and Norway exemplify that there are key factors limiting policy coherence across Europe that must be addressed to ensure the alignment of offshore wind and biodiversity policy. The following key factors have been identified:

Scientific knowledge gap: One of the key challenges is a lack of comprehensive data on the impact of offshore wind farms on marine biodiversity, making it difficult to ensure that renewable energy expansion aligns with conservation objectives.

Legal exemptions: The Renewable Energy Directive III allows exemptions from the duty to carry out Environmental Impact Assessments for offshore wind projects located in designated acceleration areas, which may result in biodiversity impacts being overlooked.

Limited impact assessments: Assessments of ecological impact are often limited to protected, red listed, and commercial species, which means that the larger ecological effects of offshore wind have not been considered. Moreover, there are currently no proper cumulative impact assessments in place.

Power imbalances: The Marine Strategy Framework Directive lacks the regulatory authority at the national level to influence energy planning decisions and does not have adequate descriptors on the ecological impacts of offshore wind. Meanwhile, the Renewable Energy Directive III has the power to prioritize renewable energy expansion over biodiversity considerations through exemptions and streamlined permitting.

Overriding public interest: Under the Renewable Energy Directive III, offshore wind projects are granted the status of 'overriding public interest' by default, making it more difficult to challenge developments on environmental grounds. While this policy is intended to streamline the energy transition, it potentially sidelines biodiversity concerns, reducing the scope for stricter environmental assessments.

F Recommendations

- **Strengthen maritime spatial planning**, establishing ‘go-to’ and ‘no-go’ areas for offshore wind development based on ecological impact assessments. For maritime spatial plans to be effective in steering development away from sensitive and important ecosystems, they must be legally binding, enforceable, and capable of integrating sectoral interests (including energy and biodiversity conservation).

- **Make the good environmental status objective under the Marine Strategy Framework Directive legally binding**. This would represent a major step in helping to align renewable energy expansion with marine conservation goals.

- **Strengthen early-stage Strategic Environmental Assessments** to provide detailed assessments of ecological impacts, and to ensure that cumulative and transboundary ecological impacts are fully considered before sites are designated, rather than relying on mitigation measures later in the process.

- **Develop a robust cumulative impact assessment framework**, including comprehensive baseline data and standardized ecological thresholds, to quantify long-term and cross-sectoral effects. This framework should integrate the Marine Strategy Framework descriptors to ensure that biodiversity is prioritized alongside energy goals.

- **Enhance coordination and integration among governmental agencies** by establishing or strengthening interdepartmental consultation mechanisms. These processes should ensure that environmental objectives are given equal weight alongside renewable energy goals.

- **Systematically integrate mitigation measures into planning and assessment processes** for offshore wind developments by including best practices on avoidance, restoration, and offsetting. This will promote long-term ecological benefits and encourage restoration and nature-inclusive designs in offshore wind projects

- **Implement adaptive management**, so that the operation of existing wind parks can respond to new scientific knowledge (for example through the inclusion of start-stop procedures when more information is available).

- **Make stakeholder engagement processes more effective**, timely, and legitimate, through both formal processes like the North Sea Consultation and informal platforms such as the Community of Practice North Sea. This can foster innovative, nature-inclusive design and multi-use strategies that reconcile renewable energy expansion with marine ecosystem conservation.

Conclusion

Improving policy coherence between offshore win energy development and biodiversity protection is essential for achieving the goals set out in the European Green Deal. The Renewable Energy Directive III, the EU Biodiversity Strategy for 2030, and the Marine Strategy Framework Directive all provide critical frameworks, but their integration and alignment face challenges. Strengthening coordination, ensuring early-stage comprehensive assessments, and reevaluating legal exemptions for offshore wind projects will be important steps in creating a truly integrated policy framework. Ensuring the coherence of these policies is pivotal in supporting both the EU's renewable energy ambitions and its commitment to safeguarding marine biodiversity for the health of European ecosystems.

This Roadmap is a result of the CrossGov project which aims to enhance knowledge on how coherence and cross-compliance of marine related policies and legislation affect the ability to realise the EU Green Deal's goals. The roadmap is based on the findings from the following CrossGov publications and reports:

- Handbook on Policy Coherence: An easy guide to assess and understand policy coherence
- Mapping EU policies and Green Deal objectives: observations for policy coherence in the marine domain, page 49-55
- Scoping: Concretising the policy targets and developing key scenarios, page 18-24
- Horizontal coherence in EU law and policy: Analysing, explaining and improving the horizontal coherence of EU policy design, page 19-21, 94-95, 105

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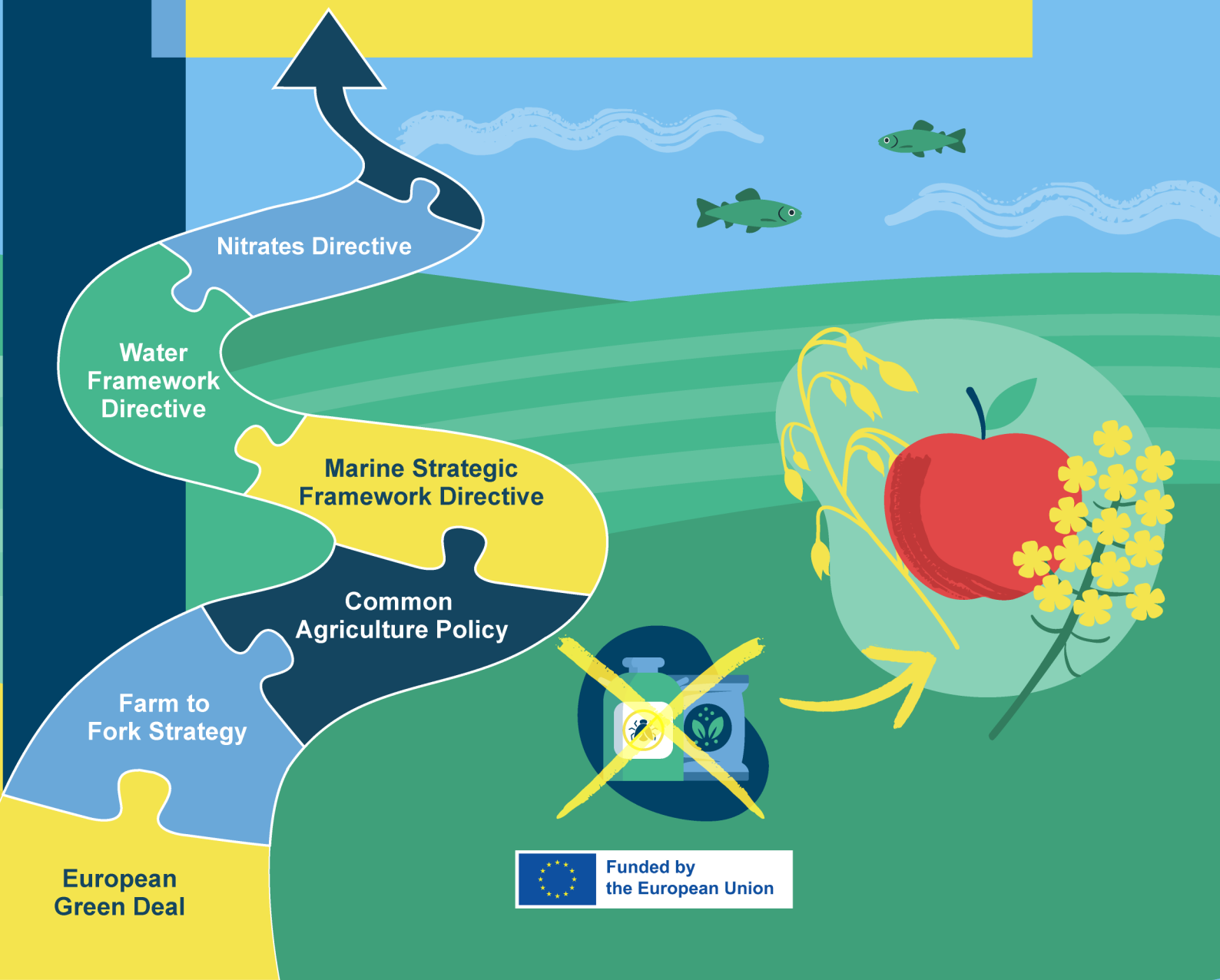
The Marine Environment& Agriculture Pollution

Roadmap to Enhanced Policy Coherence



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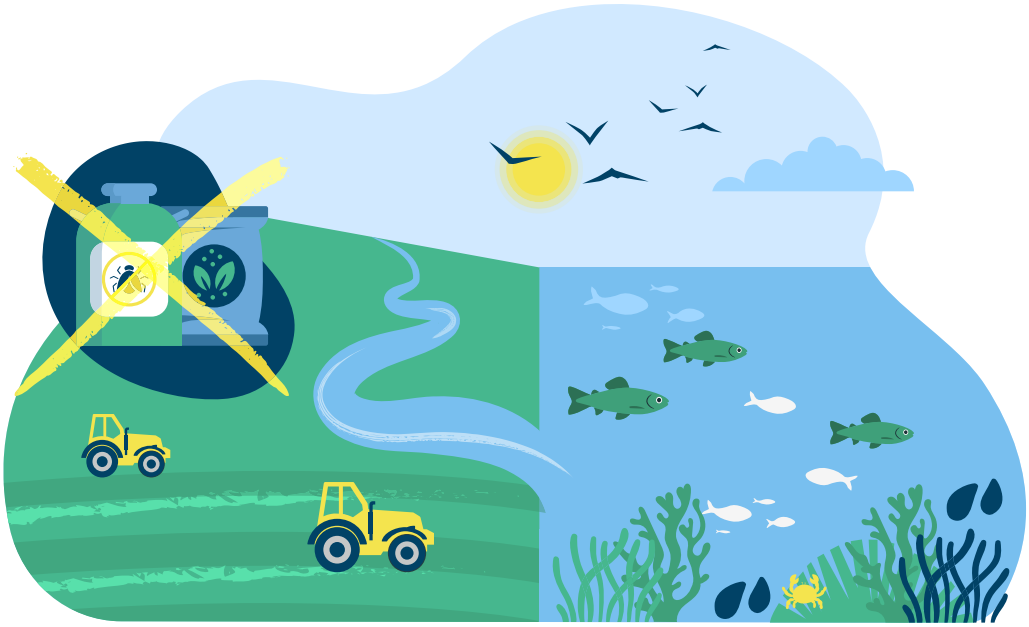
Introduction

Policy coherence is essential for ensuring that policies across different sectors, such as agriculture, environmental protection, and marine management, align to achieve shared environmental goals without conflicting with one another. In the context of nutrient pollution from agricultural runoff, the **Water Framework Directive**, the **Marine Strategy Framework Directive**, and the **Common Agricultural Policy** serve as key policy frameworks. However, there remain significant challenges in aligning these policies to achieve water quality goals and agricultural objectives.

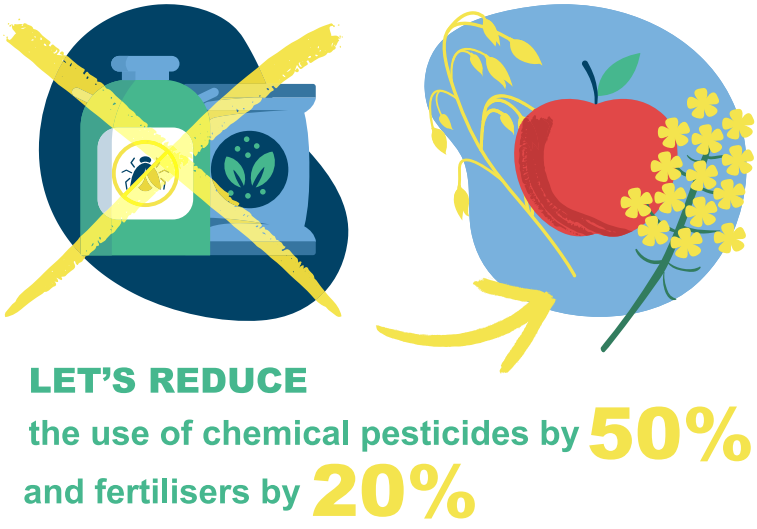
In this roadmap, we explore the current state of policy coherence in managing water and marine nutrient pollution from agriculture in the European Union. The roadmap identifies challenges, outlines key gaps, and provides recommendations to improve the integration of agricultural, water, and marine policies, ultimately contributing to a reduction in nutrient pollution from agriculture into coastal and marine ecosystems.



A Striving for zero pollution & a sustainable food system in the European Union

The overall objective of the **European Green Deal's zero pollution plan for 2050** is to reduce air, water, and soil pollution to levels that are no longer harmful to human health and natural ecosystems. In the European Union, pollution from agricultural practices, such as intensive cropping, livestock operations, and the use of fertilizers and pesticides, is the main diffuse source of surface water pollution. These practices release substantial amounts of nitrogen, phosphorus and pesticides into ecosystems, via runoff into surface and groundwater. Ultimately, these pollutants find their way into the marine environment, fuelling eutrophication in marine waters.

The Green Deal's **Farm to Fork Strategy** aims to make food systems sustainable, healthy and environmentally friendly. The strategy addresses agriculture pollution and by 2030 aims to: (1) reduce the use of chemical pesticides by 50%; (2) reduce nutrient losses by at least 50%, while ensuring that there is no deterioration in soil fertility; and (3) reduce fertilizer use by 20%. These objectives seek to align agricultural practices with the Green Deal's overarching targets to reduce pollution, safeguard ecosystems, and ensure a clean water supply.



Agricultural policy in the EU

The **Common Agricultural Policy**, established in 1962, is a cornerstone of the European Union, accounting for approximately 30% of the EU budget. The Common Agriculture Policy aims to achieve an array of economic, but also social and environmental goals. These include supporting viable agricultural incomes, enhancing the sector's competitiveness, and fostering strong rural communities. Its three environmental objectives echo those of the **Green Deal**, aiming to tackle climate change, safeguard ecosystems and enhance biodiversity. While the Common Agricultural Policy has historically supported the sector through less than environmentally friendly farming practices, the policy's most recent iterations reflect the need for a balanced approach that incorporates sustainable farming practices.

Water pollution policies in the EU

The European Union's **Zero Pollution Action Plan** identifies agricultural runoff, particularly from fertilizers and chemical pesticides, as a major threat to water quality and marine ecosystems. Agricultural runoff enters groundwater, rivers and eventually marine habitats, where it contributes to a range of environmental harms including eutrophication, biodiversity loss, and degradation of aquatic ecosystems.

Three key directives underpin the EU's efforts to reduce pollution

1. The **Nitrates Directive** targets nitrate pollution from agricultural sources, particularly manure and chemical fertilizers.

2. The **Water Framework Directive** covers inland surface waters, groundwater, and coastal waters up to 1 nautical mile from the baseline. Under this directive, Member States must develop **River Basin Management Plans** to assess the status of all water bodies within a basin, identify pressures such as nutrient pollution, and set environmental objectives. Where water bodies fail to achieve "good ecological status," the directive requires action plans with targeted measures to address the underlying pressures.

3. The **Marine Strategy Framework Directive** applies to marine waters and is the EU's primary legislative tool for protecting the marine environment. It requires Member States to achieve good environmental status in their marine waters. Descriptor 5 of the directive specifically addresses eutrophication, mandating reductions in human-induced nutrient inputs and their effects, such as harmful algal blooms and oxygen-depleted bottom waters. To comply, Member States must define environmental targets, apply assessment metrics, and implement concrete measures for nutrient reduction.

Together, these directives form a comprehensive framework to address pollution challenges linked to agriculture. Their effectiveness, however, depends on coordinated implementation across sectors, particularly with agriculture, and active enforcement at the national level.

B Agricultural & environmental policy: Barriers to coherence

The Common Agricultural Policy: Economic vs. environmental goals

The **Common Agricultural Policy** has long prioritised competitiveness of the agriculture sector, food security and rural livelihoods. Although it now acknowledges that sustainable farming is vital for the sector's long-term viability in Europe, its legacy of promoting environmentally harmful practices continues to shape current policy frameworks.

Environmental goals have been layered onto the policy as environmental understanding has evolved, but without sufficien support for relevant measures, such as adequate funding. The economic incentives within the Common Agricultural Policy may still undermine water quality objectives. Few mechanisms formally link the priorities of the Common Agricultural Policy with the ecological requirements of the **Water Framework Directive**. As a result, the Common Agricultural Policy and the Water Framework Directive risk working at cross purposes, with the Common Agricultural Policy potentially subsidising agricultural practices that hinder progress toward good ecological status.

At a broader level, while the **Common Agricultural Policy** does address water management, it rarely references the marine environment. This omission does not exclude marine waters from its scope but may reduce the attention that Member States give to marine-specific impacts

The Common Agriculture Policy's Environmental Tools: Gaps in implementation

The **Common Agriculture Policy** utilises three main instruments to advance its environmental objectives:

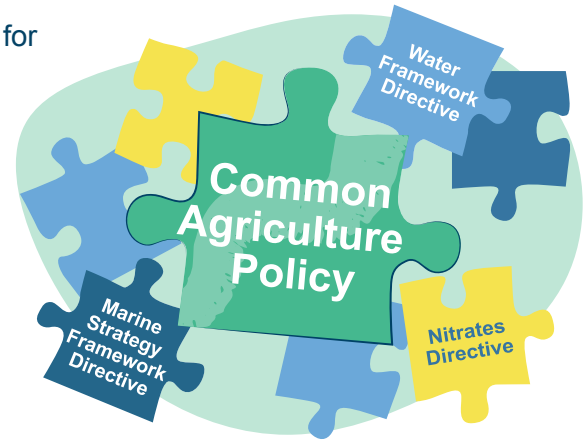
1. **Conditionality**: Farmers must meet a set of environmental and management standards to receive Common Agricultural Policy payments. These include requirements related to animal welfare, nitrate use, and restrictions on hormones, many of which apply regardless of payment eligibility. Since 2021, conditionality also includes standards for good agricultural and environmental conditions, requiring farmers to protect soil health, manage water resources responsibly, and maintain biodiversity. Adherence to these standards is a condition for receiving agricultural subsidies.

2 **Eco-schemes**: Introduced in 2023, eco-schemes are voluntary programmes that provide financial incentives to farmers who go beyond the minimum environmental requirements. They support the adoption of more sustainable, climate-friendly farming practices.

3 **Rural development interventions**: These are targeted measures aimed at promoting economic, environmental, and social sustainability in rural areas. They play a key role in supporting long-term resilience and the green transition in the agricultural sector.

In principle, these instruments should support the **Water Framework Directive**, which recognises agriculture as a major source of diffuse pollution and permits the use of Common Agricultural Policy funds to support farmers in adopting nutrient-reduction measures. In practice, however, coherence depends heavily on **National Common Agricultural Policy Strategic Plans**, the core planning documents that each EU Member State must develop under the Common Agricultural Policy. Member States have wide discretion in defining environmental goals, selecting interventions, monitoring, and ultimately allocating funding through these plans. The result is that national strategic plans diverge significantly with regard to environmental standards, funding, enforcement and monitoring.

Moreover, while eco-schemes are mandatory for Member States to offe , farmer participation remains voluntary. Therefore, the impact of the programmes ultimately depends on whether farmers opt-in to the schemes.



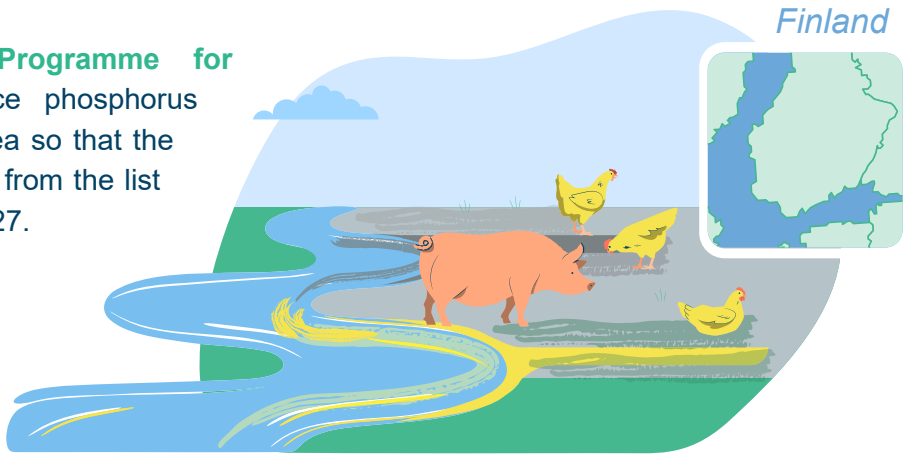
C Policy coherence at the national level

Across Europe, countries face a dual challenge: maintaining a competitive agriculture sector while meeting water quality obligations. Given agriculture's political influence, governments are often hesitant to impose stricter controls, and monitoring and enforcement are not always prioritised. The following section explores two cases: **Finland's Archipelago Sea**, governed by the Common Agricultural Policy, the Marine Strategy Framework Directive and the Water Framework Directive, and **Norway's Oslofjord**, regulated by national agricultural laws and the EU's Water Framework Directive.

The Finnish Archipelago Sea

The Finnish Archipelago Sea in the Baltic Sea, a region of 40,000 islands in southwest Finland, is the country's last HELCOM-designated pollution hot spot. Fed by nine rivers flowing through intensive agricultural areas, the sea is ecologically rich but under severe pressure. Decades of nutrient overload, driven largely by nitrogen and phosphorus runoff from agriculture, have triggered algal blooms, oxygen depletion, and ecosystem disruption, making eutrophication the region's most pressing environmental challenge.

The **Archipelago Sea Programme for agriculture** aims to reduce phosphorus and nitrogen loads in the Sea so that the water body can be removed from the list of HELCOM hot spots by 2027.



Policy framework & implementation

- The **Water and Marine Protection Programme**, also known as AHTI in Finland, aims to achieve good ecological status of inland waters and the Baltic Sea. The programme integrates catchment-based planning, nutrient-recycling pilots, soil-improvement trials and hazardous-substance management, providing a strategic platform for nutrient reduction.

- **River Basin Management Plans** put the **Water Framework Directive** into practice and, in coastal areas like the Archipelago Sea, help achieve the goals of the **Marine Strategy Framework Directive.**

- The **Archipelago Sea Programme for Agriculture** works to align **Common Agricultural Policy** payments with regional and international eutrophication-reduction targets, to create multi-level policy coherence. Key measures include improving soil and water management, increasing winter plant cover and enhancing manure use and nutrient recycling, all of which are then supported Finland's **Common Agricultural Policy Strategic Plan**.

- The **Common Agricultural Policy Strategic Plan (2023-2027) for Finland** has broadened conditionality requirements and added voluntary environmental incentives, including payments for catch crops, runoff water management, and circular economy pilots. Initiatives that have been widely adopted by farmers across Finland. The Ministry of Agriculture and Forestry coordinates this Strategic Plan, while regional Centres for Economic Development, Transport and the Environment are responsible for day-to-day implementation and enforcement.

Barriers to policy coherence

- In Finland, most agricultural water protection measures are voluntary, and responsibility for enforcement is divided among authorities. This limits the State's ability to require actions to reduce nutrient pollution and to enforce those that do exist.
- While Finland directs a substantial amount of funds to agricultural environmental schemes under the Common Agricultural Policy, most payments under conditionality are area-based (linked to the size of a farm) and not to social or environmental factors. Therefore, areas that generate the highest levels of nitrogen and phosphorus pollution are not incentivised to reduce nutrient pollution.
- In parts of the Archipelago Sea drainage basin, intensive pig and poultry farming produce more manure than the land can absorb. With little available land to spread it, phosphorus builds up in the soil and increases the risk of water pollution.
- Fertiliser use is gradually becoming more controlled in Finland, yet phosphorus build up in soil and internal loading in sediments mean that eutrophication pressures will persist for many years.
- A 2024 review by the National Audit Office found that Finland's annual €26 million water protection budget lacks coordinated planning and monitoring. Cost-effectiveness is poorly assessed, data to measure impact are limited, and current nutrient reduction targets fall short of what's needed to achieve good coastal water quality.

Solutions to enhance policy coherence

Umbrella programme for nutrient reduction: In recent years, promising programmes have been announced to reduce nutrient pollution in the Baltic Sea and the Archipelago Sea. These programmes are now brought together under an umbrella programme, the Water and Marine Protection Programme (known as AHTI in Finland), that focuses on:

(1) reducing nutrient loads by, alongside other actions, providing a roadmap for catchment-based planning; (2) Efficient management and use of resources; (3) Improving soil structure and overall condition and (4) managing hazardous substances.

Oslofjord, Norway

The Oslofjord is a coastal inlet in Norway, with a catchment area that covers 20% of the country's land area and is home to half of its population. Ecological decline in the fjord is the combined result of multiple human pressures, including agricultural runoff, wastewater pollution, overfishing, and coastal development. Agriculture alone accounts for an estimated 43% of excess nitrogen discharges, making it a major driver of eutrophication in the Fjord.

Although reducing agricultural runoff has become a high political priority, Norway's goal of increasing self-sufficienc through agricultural production makes the need to address coherence challenges between agricultural policies and water quality even more important in the future.

Policy framework and implementation

- Norway is not an EU member and thus does not implement the **Common Agricultural Policy**. Instead, it has developed its own **national agricultural policy framework**. The reduction of agricultural runoff is organized through a combination of regulatory measures and financial incentives. National regulations include for instance the use of fertilizers and size of buffer strips. The size and direction of financial contributions from the government are negotiated annually between the farmers' associations and the government.

- These national agricultural policies guide the development of **Regional Environmental Programs**. The programs include regional agricultural policy objectives and a list of voluntary agri-environmental measures (such as cover crops and buffer strips) that are eligible for financial compensation.

- Norway has transposed the **Water Framework Directive** into national law and created **River Basin Management Plans**. Norway has not implemented the Marine Strategy Framework Directive, but its national Ocean Management Plans can be considered a parallel to the EU directive. The Oslofjord and its catchment area are mainly covered through two River Basin Management Plans, while its outer parts are subject to the Ocean Management Plan.

- The **River Basin Management Plans** and the agricultural **Regional Environmental Programs** are interconnected in their efforts to protect the water quality from agricultural run-off. The **River Basin Management Plans** set the objectives and identify measures, while the **Regional Environmental Programs** provide the financial incentives and support for farmers to implement the measures. Additionally, regionally binding regulations can be adopted to help reach the River Basin Management Plans' objectives.

Barriers to policy coherence

- **River Basin Management** coordinates efforts but lacks legal authority and enforcement capabilities, relying on sectoral authorities who follow their own legal and financial frameworks. Irregular and non-detailed reporting hinders progress tracking and accountability.

- The ecological status assessment under the **Water Framework Directive** only partially covers coastal ecosystems. Consequently, many areas are classified with good ecological status, despite clear signs of ecological stress not captured by the indicators. This weakens the argument for stricter nutrient-reduction measures. While the **Ocean Management Plans** offer a more comprehensive assessment, they do not apply in coastal areas, like the Oslofjord.

- **Upstream-downstream dynamics** in large catchment areas are often overlooked. Norwegian river basins are divided into many small waterbodies, more than in other European countries. The environmental status of each waterbody drives policy measures, but this approach misses cumulative nutrient inputs from upstream waterbodies into coastal areas like the Oslofjord. Additionally, upstream freshwater bodies are less impacted by nitrogen-driven eutrophication compared to coastal waters, making nitrogen reduction a lower priority upstream.

- **Ocean Management Plans** do not include measures to address agricultural runoff. This contributes to a policy gap where nutrient discharges are only managed from a river basin perspective with a focus on individual waterbodies, and not from the perspective of coastal and marine areas.

Solutions to enhance policy coherence

Integrated planning and measures: Due to ongoing ecological decline, the government adopted an Oslofjord Action Plan in 2021 and established the Oslofjord Council to ensure political representation and coordination. In the integrated plan, agricultural run-off is addressed as one of several pressures within a single strategic plan. The plan has increased the adoption of agri-environmental measures and put an increased focus on environmental practices within the agricultural sector by taking the following actions:

- Shifting the management focus from individual water bodies to the entire Oslofjord. This catchment perspective emphasizes the need for upstream run-off reduction measures

- Creating earmarked financial subsidies for run-off reduction measures as part of the annual agricultural negotiations.

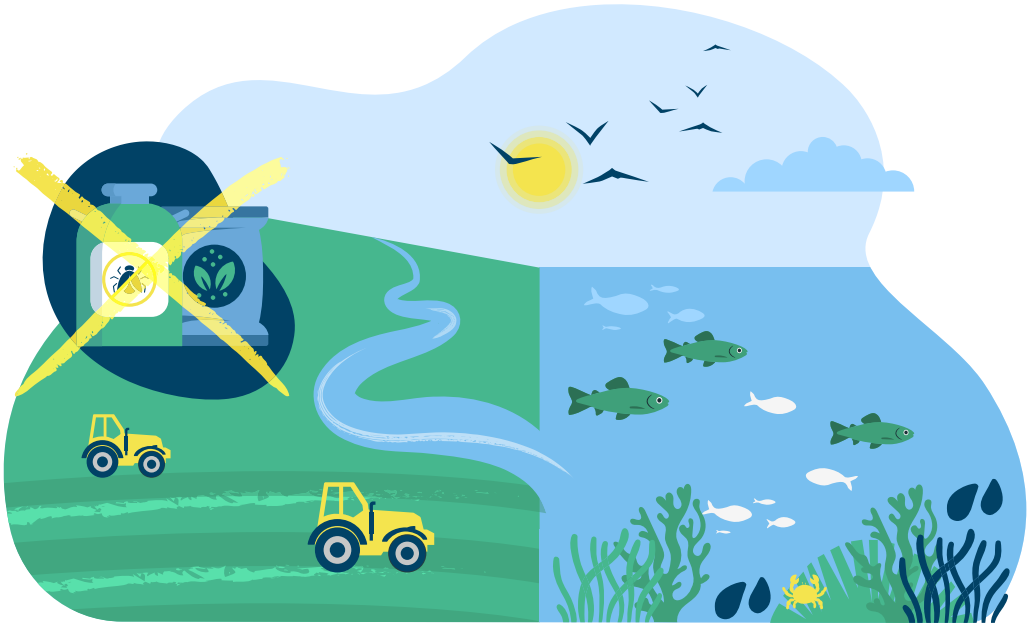
- Advancing the adoption of new agricultural regulations that reduce run-off and fertilizer application

- Mandating annual status reporting by municipalities and sectoral authorities.

- Driving political mobilization and societal awareness about the challenges in the Oslofjord, mobilizing sectors and actors across the catchment.

- Engaging sectors and stakeholders across the entire catchment area and raising public awareness about the challenges facing the Oslofjord.

Improved coordination: While agricultural policy and river basin management are decentralized in Norway, coordination between agricultural and environmental authorities at the national level, such as through the River Basin Management national directorate group, has been crucial in clarifying conflicting objectives and creating guidelines that inform decision-making and implementation of agri-environmental practices in the agricultural sector across the different governance levels.



D Recommendations to improve policy coherence

Improving policy coherence between agriculture and water protection is essential to tackling nutrient pollution in Europe's coastal and marine environments. The following recommendations propose practical changes that national and regional authorities can make to align agricultural policy with environmental goals and support healthier marine environments free from eutrophication across Europe:

- **Prioritise nutrient hot spots**: Direct funding and measures toward high-impact catchments, to maximise ecological benefit from limited resources.
- **Enhance the capacity and responsibilities of river basin management authorities**: Increased human and financial resources can improve coordination with sectoral authorities, supported by more transparent and regular reporting of implementation progress.
- **Establish political steering and coordination through an overarching Action Plan**: Enhancing political mobilisation and the implementation of environmental agricultural measures can be achieved through the creation of a comprehensive action plan.
- **Strengthen the source-to-sea perspective in river basin management**: An increased focus on coastal areas, which are the final recipients of cumulative discharge from large catchment areas, necessitates policy planning that extends beyond the ecological status of individual water bodies.
- **Integrate marine policies into river basin management through a science-based approach**: Assess maximum nutrient input targets to coastal waters and apply these for catchment-based planning of nutrient reduction.
- **Integrate the environmental assessment for river basin and marine management**: Align indicators and monitoring data between the Water Framework Directive and Marine Strategy Framework Directive to provide for integrated assessments of coastal areas.
- **Provide funding to farmers for environmental actions**: Reserve subsidies for actions that go beyond legal compliance, and channel Common Agricultural Policy resources toward innovation, technology adoption, and practices that farmers are unlikely to implement without support.
- **Invest in monitoring and cost-effectiveness analyses**: Enhance nutrient monitoring systems and require routine cost-benefit assessments to demonstrate ecological impact, support adaptive management, and build public trust in subsidy programmes.

Conclusion

Diffuse nutrient pollution from agriculture is a major barrier to achieving healthy marine ecosystems across Europe. Fragmented governance and untargeted subsidies continue to undermine efforts to reduce nutrient loads. Strengthening coherence between agricultural and environmental frameworks, through integrated planning, better enforcement, and performance-based funding, will be essential to achieving the EU's zero pollution goals, protecting marine biodiversity, and securing the long-term sustainability of Europe's food systems.

This Roadmap is a result of the CrossGov project which aims to enhance knowledge on how coherence and cross-compliance of marine related policies and legislation affect the ability to realise the EU Green Deal's goals. The roadmap is based on the findings from the following CrossGov publications and reports:

- Handbook on Policy Coherence: An easy guide to assess and understand policy coherence
- Horizontal coherence in EU law and policy: Analysing, explaining and improving the horizontal coherence of EU policy design,
- Coherence in Policy Landscape and Design
- Publications within work package 3 of CrossGov, to be published in fall 2025. Please stay tuned to the CrossGov website for more information.

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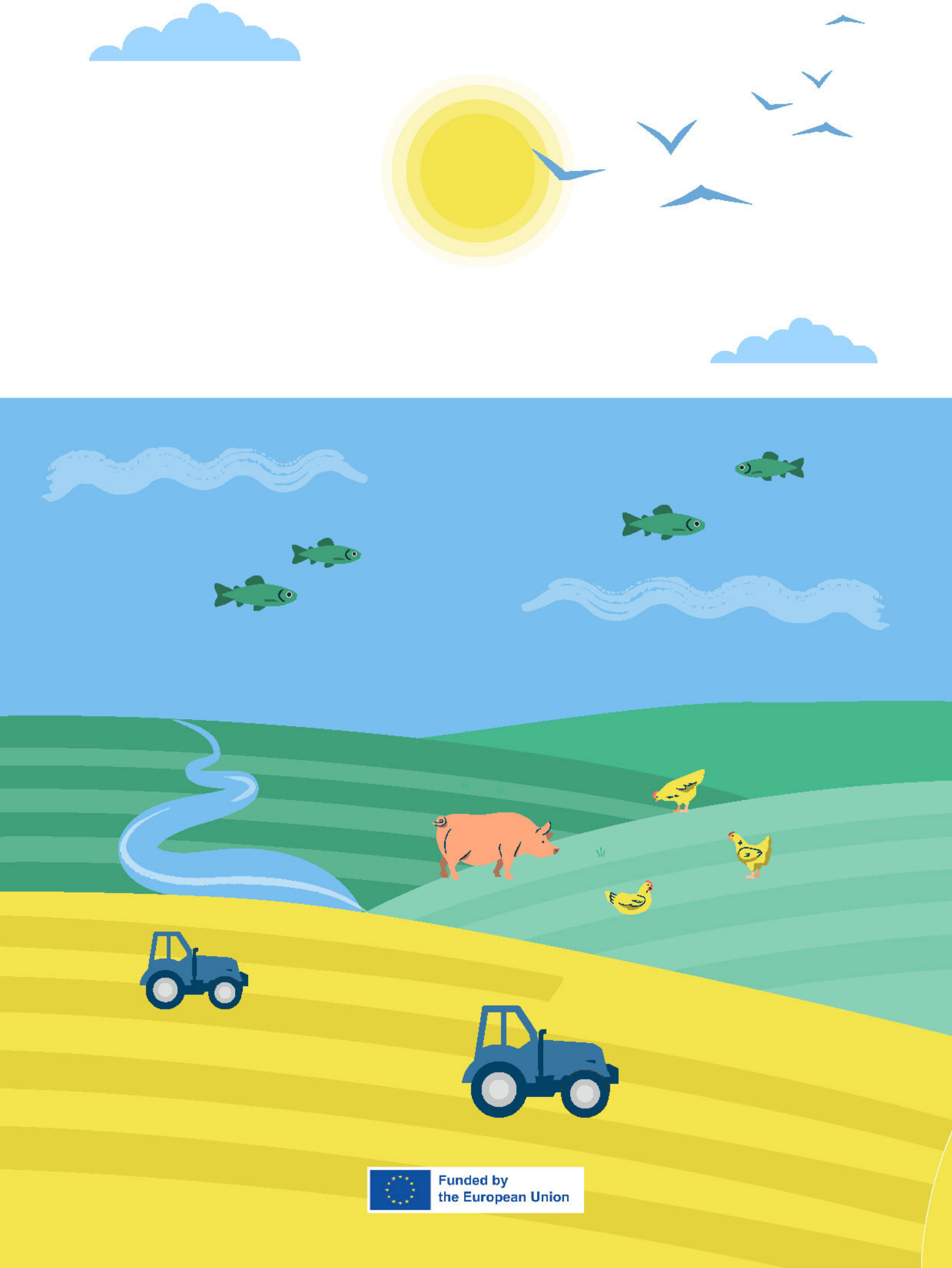

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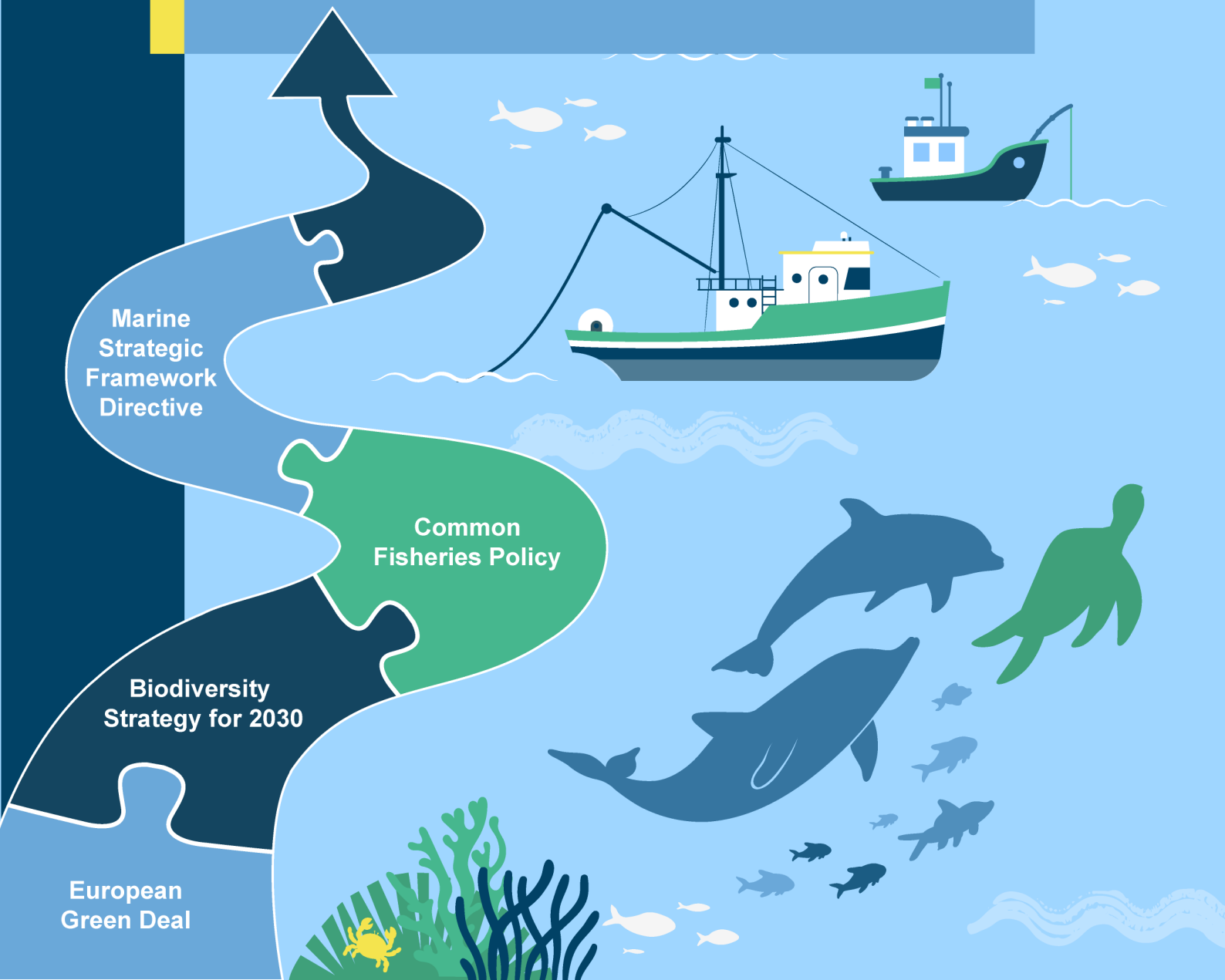
Fisheries & Biodiversity Conservation

Roadmap to Enhanced Policy Coherence



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Roadmap Summary

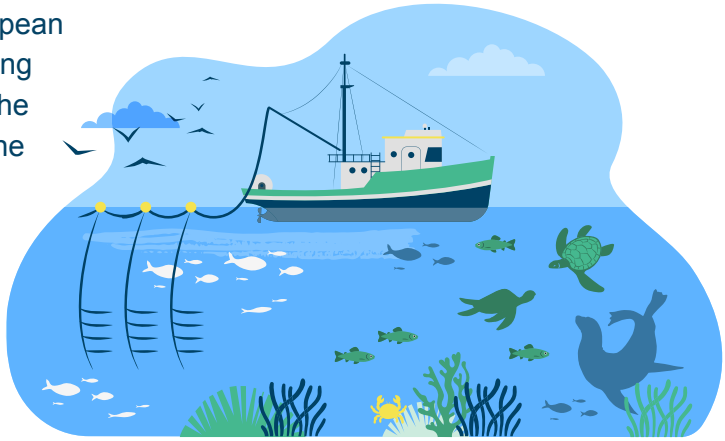
The European Union has set ambitious targets through the European Green Deal and the EU Biodiversity Strategy for 2030, aiming to reverse biodiversity loss and ensure the sustainable use of natural resources. Healthy marine ecosystems are central to these goals, playing a critical role in climate regulation, food security, and the livelihoods of coastal communities. However, the EU's marine environment continues to face significant pressures, including from unsustainable fishing practices.

While both fisheries policy, primarily governed through the **Common Fisheries Policy**, and biodiversity policy, anchored in instruments like the **EU Biodiversity Strategy**, the **Marine Strategy Framework Directive** and the **Habitats and Birds Directives**, seek to promote sustainable marine resource use, the sectoral policies operate under distinct legal mandates and governance structures, creating challenges for coherent action at the EU, regional sea, and national levels.

This **roadmap examines policy coherence between fisheries and biodiversity policies in the EU**, identifying key governance and implementation challenges. Drawing on case studies and stakeholder insights from the Mediterranean Sea, it outlines **practical recommendations for improving policy coherence** and ultimately advancing both a sustainable fishing industry and a healthy marine environment.

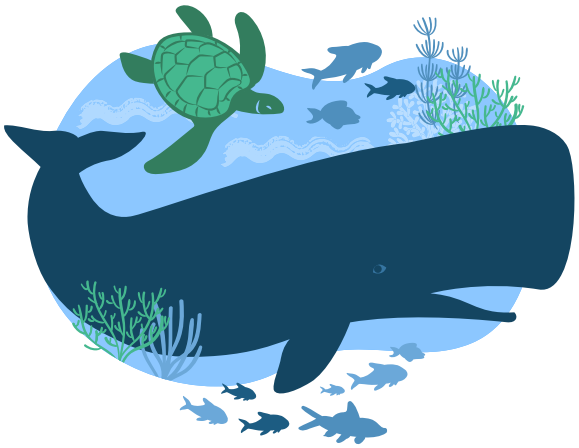
A Striving for sustainable fisheries and a healthy marine environment in the European Union

Launched in 2019, the **European Green Deal** aims to achieve climate neutrality by 2050 while fostering a sustainable economy that prioritises environmental health and human well-being. As a part of the Green Deal, the **EU Biodiversity Strategy for 2030** aims to put biodiversity on a path to recovery by 2030. Central to both policies is the ocean, which is critical to achieving the European Union's environmental goals.



The **Common Fisheries Policy**, the European Union's primary regulatory framework for fishing and aquaculture, traces its origins back to the Treaty of Rome (1958). Since its inception, the policy has undergone significant change. In 1983, environmental measures, in the form of conserving and managing fish stocks, were integrated into the policy for the first time. The current framework, resulting from the latest 2013 reform, aims to ensure that EU fisheries are **economically, socially,** and **environmentally sustainable**. The policy serves as the key instrument for aligning fisheries management with the objectives of the Biodiversity Strateg .

Ambitions to protect biodiversity in the EU



The European Union's biodiversity vision is ambitious: a world where ecosystems, from coastal wetlands to the deep ocean, are restored to health, resilient to future shocks, and safeguarded for future generations. One of the potentially most transformative commitments is to designate at least 30% of marine areas in the EU as legally protected zones by 2030. This includes strict protection for at least 10% of all waters.

The **Biodiversity Strategy for 2030** recognises that fisheries management is integral to the conservation of marine biodiversity, stating that “fish stocks are key to the long-term prosperity of fishermen and the health of our oceans and biodiversity”. The Strategy outlines measures critical to the protection of fish stocks, such as reducing or eliminating by-catch to support the recovery of threatened species, establishing conservation-based fishery management plans in marine protected areas, and maintaining or, where necessary, reducing maximum sustainable yield levels.

The **Marine Strategy Framework Directive** serves as the primary legislative tool to protect the marine environment. Under the Directive, EU Member States are required to achieve **good environmental status** in their marine waters. **Descriptor 1** of the Directive directly addresses biodiversity, mandating that the long-term viability of species should be ensured, by observing the mortality rates and abundance of species, as well as their distribution and several other characteristics, such as body size and age.

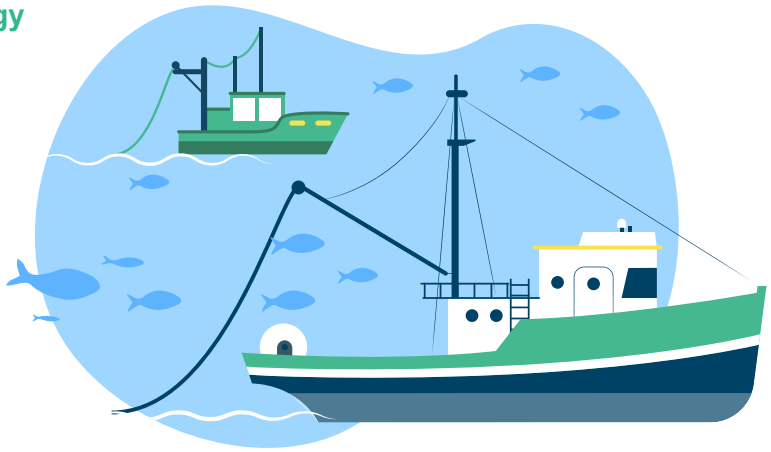
Fisheries management in the EU

The core policy for regulating fisheries management in the EU is the **Common Fisheries Policy**. The policy’s regulatory scope is multifaceted: it regulates the sustainable management of fisheries and the fleets that exploit those resources, while also extending into markets and financial measures, including aquaculture and the processing and marketing of fish products

The Common Fisheries Policy mandates the **precautionary approach** to fisheries management, meaning that conservation measures to preserve fish stocks, such as setting limits on how many fish can be caught or protecting specific species, should be taken before serious damage to the marine environment is caused. Further, the newest iteration of the policy from 2013, outlines that an **ecosystem-based approach** to fisheries management should be implemented to ensure that the negative impacts of fishing activities on the marine ecosystem are minimised. Further, it is outlined in the policy that steps should be taken to make fisheries policy coherent with the Marine Strategy Framework Directive.

Descriptor 3 of the **Marine Strategy Framework Directive** directly addresses fisheries, m andating that all commercially exploited fish stocks must be healthy and not declining.

The Directive requires fisheries to be managed following an ecosystem-based approach and aims to support the integration of environmental concerns into other polices, such as the Common Fisheries Policy.



B Sustainable fisheries and biodiversity policy: Barriers to coherence

The current state of policy coherence between fisheries management and biodiversity conservation in the EU reveals both signs of progress and persisting challenges. While measures to increase coherence exist, challenges in implementation continue:

Article 11 of the Common Fisheries Policy: Complicating the ability of Member States to enact conservation measures

Although environmental objectives have been incorporated into the **Common Fisheries Policy**, fisheries management is yet to align in practice with the **Marine Strategy Framework Directive**. While Member States are legally required to achieve good environmental status under the directive, their ability to implement fisheries regulations within their Exclusive Economic Zones is constrained in areas beyond 12 nautical miles from the coast.

Article 11 of the Common Fisheries Policy states that a Member State may adopt conservation measures in its own waters to comply with EU environmental directives, provided that the measures do not affect fishing vessels from other EU Member States. However, beyond 12 nautical miles, fishing vessels from other EU Member States have equal access to fisheries resources. For that reason, the possibility to enact fisheries measures to ensure a good environmental status of the marine waters beyond 12 nautical miles is limited.

The country implementing the measure is required to submit a joint recommendation with the other affected Member States or request the Commission to act. This requirement has led to Article 11 being highly ineffective and falling short of its goals. Attempts to enact Article 11 have led to drawn-out procedures, high levels of bureaucracy and watered-down action. Currently, only a few Member States have utilised the tool because it is complicated and time-consuming, which ultimately has led to limited environmental protection in waters beyond 12 nautical miles from the coast.

Sustainability provisions in the Common Fisheries Policy: Gaps in implementation

The Common Fisheries Policy contains **direct provisions to manage the impact of fisheries on the environment and protect biodiversity**. These include fishing quotas, temporary fishing bans by season or area, and regulations on fishing gear. These measures have proven to be effective if limits and restrictions that support sustainable fish stocks are set and implemented. However, to date, these measures have not been able to eliminate overfishing in European waters. While good examples do exist, catch limits have not always been effective due the lack of reliable data on the level at which they should be set. Further, public authorities have been reluctant to take up gear restrictions and temporary fishing bans, by season or zone of interest, due to lengthy administrative procedures and pressure from the fishing industry.

C An attempt to increase coherence: The EU Marine Action Plan

In response to the shortcomings laid out above and the desire and need to accelerate the shift to more sustainable fishing practices, the European Commission published the **EU Marine Action Plan: Protecting and restoring marine ecosystems for sustainable and resilient fisheries** (2023). The action plan is part of the Commission's efforts to implement the EU's environmental and fisheries policy coherently. The plan includes provisions on reducing the catch of juvenile fish, using technology to prevent the catch of sensitive species, and phasing out bottom fishing in marine protected areas. Interviews conducted by CrossGov reveal that Directorate-Generals within the Commission view the Marine Action Plan as a critical tool for achieving results. To date, however, the plan has not gathered the necessary political support outside of the Commission to be consistently effective, leading to mixed results in its implementation.

D Policy coherence at the regional seas level

Fisheries Policy is implemented at the regional and national levels through a **shared governance system** involving international frameworks, the EU, Member States and regional bodies. **At the sea basin level,** the Common Fisheries Policy encourages **regional cooperation** to allow for a more tailored and effective management of fisheries. Regional bodies address sea basin specific environmental and fisheri s challenges and allow for a broad range of authorities and stakeholders to participate in the fisheri s management process. The following section explores policy coherence between fisheries management and biodiversity protection in the Mediterranean Sea

The Mediterranean Sea

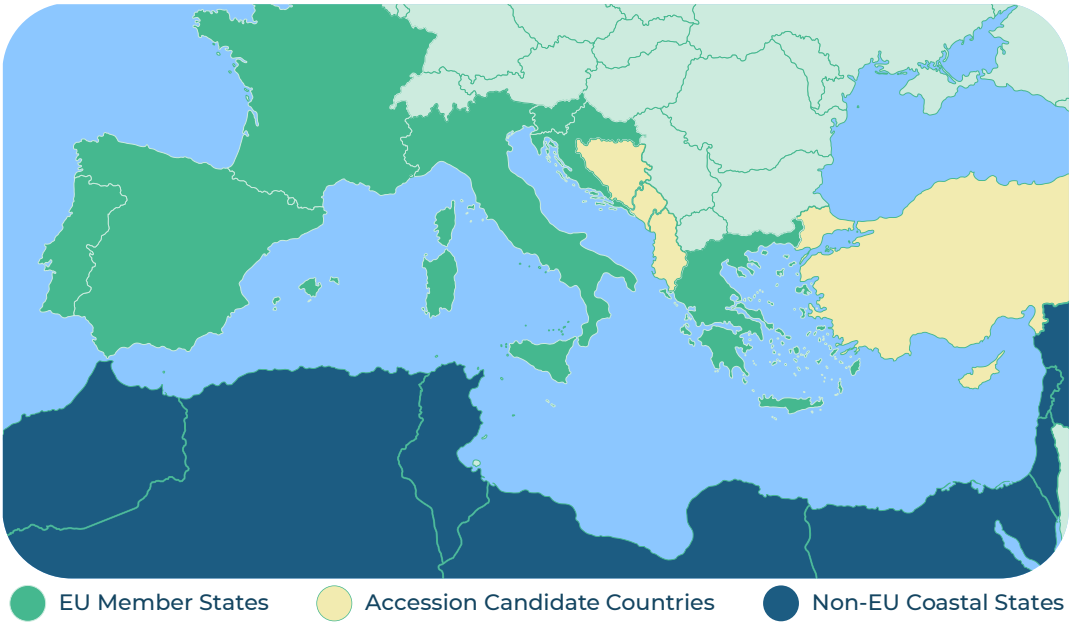
The Mediterranean Sea is a **global biodiversity hotspot** facing mounting pressures. Climate change is causing acidifi ation and warming, which is displacing fish species and leading to fish die-offs. Further, overfishi g has led to the over exploitation of more than 60% of Mediterranean fish stocks. While nearly 10% of the Mediterranean is designated as marine protected areas, only 1% is appropriately managed, leaving much of the region's rich biodiversity vulnerable to exploitation (WWF Mediterranean: Fisheries & MPAs).

Stretching across **22 countries**, eight of which are EU Member States, the Mediterranean's policy landscape is complex. Around the Mediterranean, countries can be placed into three groups:

1. **EU Member States**, which are bound by the core EU policies on biodiversity and fisheries

2. **Countries at various stages of EU accession**, which are gradually aligning parts of their legal frameworks with EU legislation but not bound by EU law.

3. **Countries not subject to EU law**, the nine remaining Mediterranean countries which are not bound by EU policy on biodiversity and fisheries



In sea basins like the Mediterranean, which include both EU and non-EU countries, the application of EU policies on fisheries and biodiversity is limited to EU Member States, making policy alignment more challenging. To govern fisheries and biodiversity across the entire Mediterranean Sea, mechanisms at the international level (i.e. under the United Nations), have been developed. Aimed at supporting fisheries management and biodiversity protection, these frameworks are necessary to align both EU and non-EU countries in the region.

Policy Framework in the Mediterranean

The key biodiversity and fisheries frameworks for the Mediterranean are the following:

- **The Barcelona Convention** is the overarching environmental policy umbrella addressing biodiversity. It is administered through the United Nations Environmental Programme Mediterranean Action Plan.

- **The General Fisheries Commission for the Mediterranean and Black Seas**, operating under the Food and Agriculture Organisation of the United Nations, manages fisheries across the Mediterranean and counts 22 countries and the EU as its contracting parties.

- **The International Commission for the Conservation of Atlantic Tunas** oversees the management of tuna and tuna-like species in the Atlantic Ocean, the Mediterranean and Black Seas.

Coherence with European Union Policy

Efforts have been made to ensure policy coherence between the Mediterranean level policies and EU level policies on biodiversity and fisheries

- The Barcelona Convention's **Post-2020 Strategic Action Plan for Biodiversity** is central to aligning the region's biodiversity objectives with the **EU Biodiversity Strategy for 2030**. The plan echoes that 30% of marine areas should be protected by 2030, though it does not stipulate that 10% should be under strict protection.

- The **Integrated Monitoring and Assessment Programme**, one of the implementing arms of the Barcelona Convention, closely mirrors the **Marine Strategy Framework Directive**, including the definition of **Good Environmental Status** and related ecological objectives.

- The **General Fisheries Commission for the Mediterranean 2030 Strategy**, the principal fisheries strategy in the Mediterranean, aligns with the **Common Fisheries Policy** to ensure the sustainable management of fisheries and reduce the environmental impacts of fishing. As the EU is itself a contracting partner in the General Fisheries Commission for the Mediterranean, the EU helps shape the policy, seeking to align it with the rules and standards set out in the Common Fisheries Policy.

- While the **General Fisheries Commission for the Mediterranean's recommendations** are not automatically binding under EU law, the **EU transposes them through annual Commission Implementing Acts**, which set fishing opportunities (i.e., annual catch limits). The result of this is that recommendations from the General Fisheries Commission for the Mediterranean are **legally binding for EU Member States in the region**.

Successes in the Mediterranean: What can other regions learn?

- **Fishery Restriction Measures: Bridging sustainable fisheries and marine conservation**

The establishment of new **Fishery Restricted Areas**, in combination with the **lowering of fishing quotas**, the implementation of **seasonal closures, reducing by-catch** and **managing gear**, by the General Fisheries Commission for the Mediterranean has contributed to a **31% reduction in overexploited stocks** over the past decade (FAO: The State of Mediterranean Fisheries). A minority of the designated Fishery Restricted Areas are now being considered for designation as **Other Effective Area-Based Conservation Measures**. This recognition would allow them to count toward the goal of protecting 30% of marine waters by 2030. This action would then also support not only sustainable fisheries, but conservation targets, contributing directly to the objectives of the EU Biodiversity Strategy and the Barcelona Convention.

Species Action Plans: Protecting vulnerable species and ensuring sustainable fisheries

Recent research projects such as **MedByCatch** and **Depredation** highlight the concrete benefits of enhanced cooperation between bodies under the **Barcelona Convention** and the **General Fisheries Commission for the Mediterranean**. These joint efforts have led to the development and update of species action plans. In turn, the fishing commission has taken these plans into account in its decision making, ensuring that vulnerable species are consistently protected. These actions have helped to ensure that conservation and fisheries policies are aligned when it comes to the protection of vulnerable fish species.

Successful management measures for the Atlantic Bluefin Tuna

The **International Commission for the Conservation of Atlantic Tuna** provides a strong example of how governance, science-based management, and strict compliance mechanisms can lead to the recovery of overexploited fish stocks. The commission's approach includes robust quota systems, monitoring and control measures, and the integration of scientific advice into decision-making. These **sustainability measures** directly contribute to reducing pressures on the Atlantic Bluefin Tuna populations in the Mediterranean Sea. The organisational models and technical strategies implemented by the International Commission for the Conservation of Atlantic Tunas provide lessons to be learned for other fisheries in the Mediterranean and the EU

E Policy coherence at the national level

The **General Fisheries Commission for the Mediterranean** issues recommendations for geographic areas, which result in management plans for specific fisheries. At the EU level, these recommendations then feed into **Commission Implementing Acts** set by the European Commission, which define yearly fishing opportunities (i.e., annual catch limits). Through this process, the General Fisheries Commission for the Mediterranean's recommendations are directly integrated into the Common Fisheries Policy, which makes them obligatory immediately for all EU Member States.

Therefore, at the national level in the Mediterranean, **EU Member States** are **responsible for implementing both the recommendations of the General Fisheries Commission for the Mediterranean and the Common Fisheries Policy**. The following section explores two EU cases of policy coherence in the Mediterranean: The Northern Adriatic Sea in Italy and the French Mediterranean.

The Italian Northern Adriatic Sea

The Northern Adriatic Sea is a key area for fisheries in Europe, shaped by the mixing of freshwater inflows from five Italian rivers and saltwater. While the fisheries sector has a deep socio-economic importance in the region, it also exerts significant pressure on the marine ecosystem, particularly through bottom trawling and hydraulic dredging. Additionally, small-scale fisheries target a diverse range of species, presenting challenges for their management.

Key policies, planning instruments & tools

The **National Triennial Programme for Fisheries and Aquaculture** provides strategic policy direction in Italy and is guided by overarching goals linked to the Common Fisheries Policy: the advancement of sustainable fisheries (by reducing fleets' capacity and intensifying control over Illegal, unreported and unregulated fishing) and the achievement of Maximum Sustainable Yield in all commercially exploited fish stocks.

The **National Management Plans** adopted by the Ministry of Agriculture, Food Sovereignty, and Forestry constitute also key instruments through which the Ministry manages specific fishing techniques (e.g. hydraulic dredging and trawling), while also regulating (e.g. trough fishing bans, fishing permits, regulation of minimum landing size of catches, gears selectivity) their impacts on marine ecosystems and biodiversity.

The **National Operational Programme under the European Maritime, Fisheries and Aquaculture Fund** is the key financial tool for implementing fisheries policy. It provides funding to a wide range of actors, including public authorities, fishers and producer organisations to support the transition to **sustainable fishing practices**. Further, in its aim to ensure sustainable fishing, it directly contributes to **Descriptor 3** of the Marine Strategy Framework Directive, which states that all commercially exploited fishing stocks should be healthy and not declining.

The **Maritime Spatial Plan for the Adriatic** incorporates objectives and measures that support sustainable fisheries into its framework. These include **spatial protections and area-based planning**, which help ensure that fisheries and environmental goals are both considered.

Successes in the Northern Adriatic: What can other countries learn?

Involving Fisheries Local Action Groups & local stakeholders

The **Northern Adriatic Fishing District** and **Fisheries Local Action Groups,** funded by the European Maritime, Fisheries and Aquaculture Fund, play a crucial role in facilitating shared management of fisheries in the Northern Adriatic. While the **Fishing District** promotes partnerships with producers and businesses in the fisheries sector to propose actions for sustainable fisheries management, **Fisheries Local Action Groups** have the potential to play a pivotal role in the integration of biodiversity objectives and sustainable fishing.

In collaboration with research institutes and NGOs, Fisheries Local Action Groups in the Northern Adriatic have, for example, contributed to biodiversity projects such as those on the protection of Loggerhead Turtles (Caretta caretta). Further, the local fisheries groups have been involved in the development of management plans for two marine Natura 2000 sites located in front of the Po Delta. These examples showcase how joint action for sustainable fisheries and the marine environment can have a potential positive impact when local stakeholders are involved and empowered in the decision-making process.

Using EU directives as integrative tools

The **Marine Strategy Framework Directive** and **Maritime Spatial Planning Directive** provide a framework for better integrating fisheries and biodiversity policies. Cross-referencing these policy goals has the potential to foster more coherence and integration. The **Maritime Spatial Plan for the Adriatic** contains objectives and measures on fisheries, which are closely aligned with those of the Marine Strategy Framework Directive, furthering coherence. This includes, for example, the goal to promote cooperation between small-scale fisheries operators and marine protected area managers to improve the co-management of Marine Protected Areas.

The French Mediterranean

As in the Northern Adriatic Sea, fishing is deeply embedded into the cultural identity of France's Provence-Alpes-Côte d'Azur region. In this region, 20% of fish stocks are overfished, and 2% have collapsed. This has resulted in increased pressure on marine ecosystems and local fisheries. With the added strain of climate change and increased economic activity at sea, there is a recognised need for coherent policies that align environmental protection with sustainable fisheries management.

Key policies, planning instruments & tools

- The French **National Action Plan for Sustainable Fisheries (2022)** aligns with France's broader maritime policies and the **European Maritime, Fisheries and Aquaculture Fund**. The action plan provides a strategic framework to improve knowledge of fish stocks and modernise the secto .

- **France's National Operational Programme under the European Maritime, Fisheries and Aquaculture Fund** distributes funds to fisheries stakeholders, prioritising the realisation of sustainable fisheries. The plan outlines eleven objectives, one of which specifically addresses biodiversity protection. This is a shift from previous versions of the programme which were entirely centred on economic development and competitiveness of the sector.

- **Management plans for various fishing techniques**, such as dredging, implement recommendations from the General Fisheries Commission for the Mediterranean and thus the Common Fisheries Policy. These plans aim to ensure the sustainable exploitation of stocks and marine ecosystems.

Successes in the French Mediterranean: What can other countries learn?

- **Developing a science-policy interface**
  To support the coherence between biodiversity policies and fisheries, the French transposition of the Marine Strategy Framework Directive includes spatial maps and tools that track both activities at sea and indicate how biodiversity conservation and economic use of the sea can be coordinated. These maps and tools support improved decision-making based on both conservation and economic objectives, strengthening coherence between biodiversity and fisheries policies

- **Temporal fishing bans to support biodiversity goals**
  The General Fisheries Commission for the Mediterranean has defined **two Fisheries Restricted Areas** in the French Mediterranean Sea. One small zone is completely restricted to fisheries, and the other to demersal fishing for certain months each year. These restricted areas have had a very positive impact on hake stocks, which had previously collapsed, reducing catches by 57%.

- **Conditional funding from the European Maritime, Fisheries and Aquaculture Fund**
  The European Maritime, Fisheries and Aquaculture Fund operational programme is aligned with the priorities of the French transposition of the Marine Strategy Framework Directive. A clear mention is made to the science-policy interface: "Priority will be given to projects that include a dimension of improving knowledge of the impact of climate change on stocks of interest to fisheries". As a driving force behind current fishing practices, funding can support biodiversity protection objectives by adding environmental conditionalities as prerequisites for eligibility.

F Recommendations for improved policy coherence

The following recommendations co-developed within the CrossGov project highlight actions to improve coherence of fisheries and biodiversity policy at the European Union and national levels:

Strengthen Alignment Between Fisheries Policy and Biodiversity Objectives

To maximise conservation outcomes, fisheries regulations, such as gear restrictions, catch limits, temporal closures, and no-take zones, should be more directly aligned with biodiversity targets. Clearer integration of these objectives can ensure that fisheries management actively contributes to biodiversity goals.

Enhance Stakeholder Participation Across Sectors

At the national level, actively involving fisheries stakeholders, particularly small-scale operators, in biodiversity policy implementation can foster shared ownership and lead to more integrated, practical solutions. At the EU level, initiatives like the EU Marine Action Plan and the forthcoming European Ocean Pact can play a pivotal role in facilitating cross-sector engagement. For instance, the newly established working group under the EU Action Plan brings together fisheries and environmental authorities to support more coordinated governance.

Promote Cross-Sector Collaboration to Map Vulnerable Ecosystems and Key Habitats

Enhanced collaboration between environmental authorities and the fisheries sector is essential to identify and map vulnerable marine ecosystems and essential fish habitats. This shared effort can support the designation of Fishery Restricted Areas and the implementation of Other Effective Area Based Conservation Measures.

Leverage Existing Coordination Platforms, such as Fisheries Local Action Groups

Established mechanisms such as Fisheries Local Action Groups offer valuable opportunities to integrate biodiversity considerations into fisheries policy discussions. In regions like the Mediterranean, cooperation projects involving a wide range of stakeholders have proven effective despite geopolitical challenges and should be further encouraged and expanded.

Align Funding Instruments with Biodiversity Goals

Currently, the European Maritime, Fisheries and Aquaculture Fund does not fully incentivise sustainable fishing practices. While enforcement of the Common Fisheries Policy and Marine Strategy Framework Directive remains largely regulatory, funding is ultimately a key driver of fishing behaviour. Introducing environmental conditionalities for accessing funds could ensure stronger alignment between financial incentives and biodiversity conservation objectives

Conclusion

Achieving sustainable fisheries and robust marine biodiversity in the European Union requires stronger policy coherence between environmental and fisheries frameworks. While instruments like the Common Fisheries Policy and Marine Strategy Framework Directive have made strides, implementation gaps and structural challenges limit their effectiveness. Encouraging regional collaboration, science-based management, and stakeholder engagement, as seen in the Mediterranean, offers valuable lessons. Integrating biodiversity objectives directly into fisheries governance and aligning funding with environmental goals will be critical. Ultimately, a coordinated, cross-sectoral approach is essential to ensure healthy oceans and resilient fisheries for future generations.

This Roadmap is a result of the CrossGov project which aims to enhance knowledge on how coherence and cross-compliance of marine related policies and legislation affect the ability to realise the EU Green Deal's goals. The roadmap is based on the findings from the following CrossGov publications and reports:

- Handbook on Policy Coherence: An easy guide to assess and understand policy coherence
- Mapping EU policies and Green Deal objectives: observations for policy coherence in the marine domain
- Horizontal coherence in EU law and policy: Analysing, explaining and improving the horizontal coherence of EU policy design,
- Publications within work package three of CrossGov, to be published in fall 2025. Please stay tuned to the CrossGov website for more information.

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