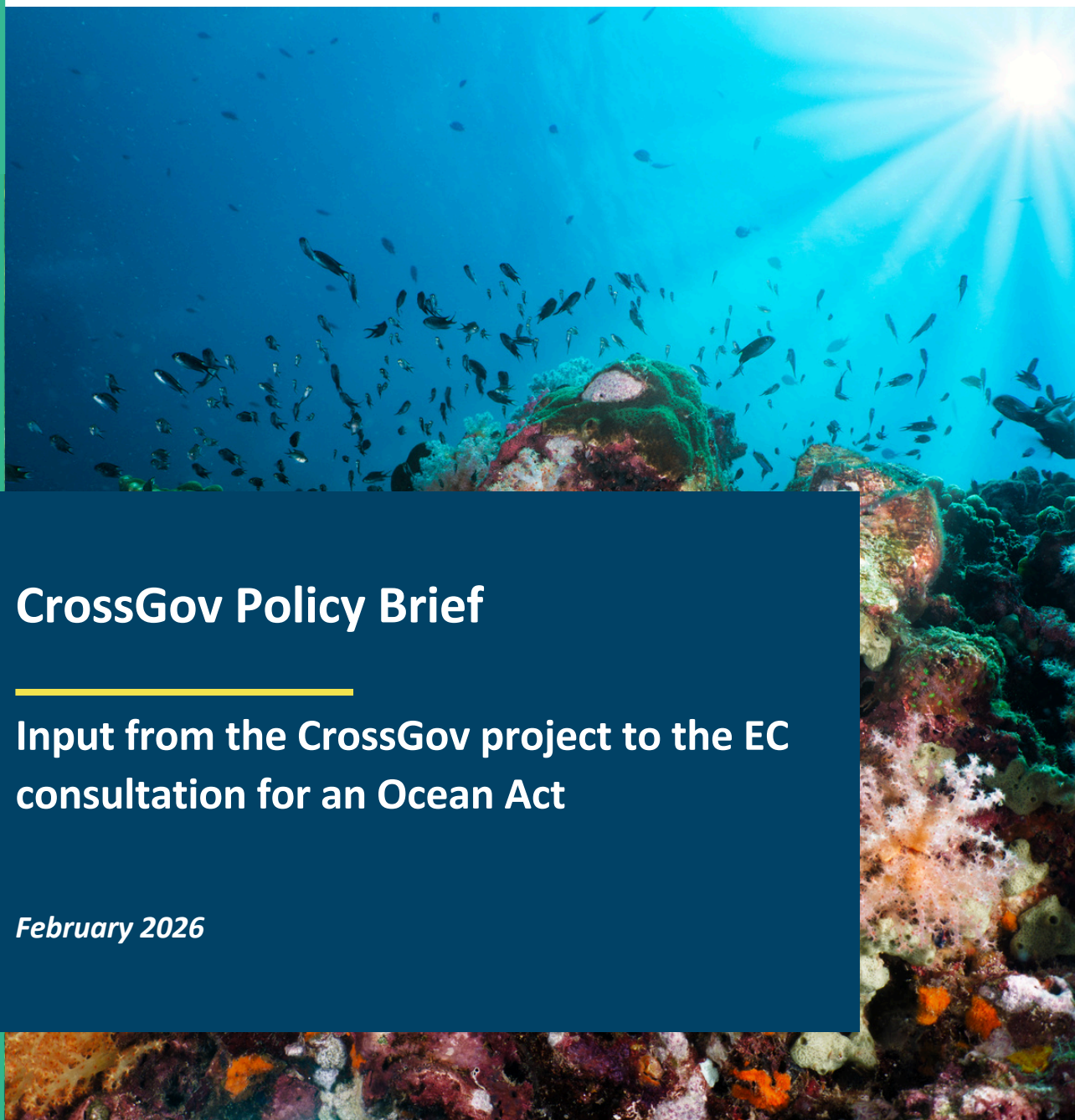




**Coherent & Cross-compliant Ocean Governance for
Delivering the EU Green Deal for European Seas**



CrossGov Policy Brief

**Input from the CrossGov project to the EC
consultation for an Ocean Act**

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Input from the CrossGov project to the EC consultation for an Ocean Act

This note presents key evidence and recommendations from the CrossGov project to support the preparation of the European Ocean Act. CrossGov demonstrates how stronger policy coherence across EU marine-related policies can better deliver the ocean objectives of the European Green Deal. Our work shows that fragmentation, legal asymmetries, and siloed implementation continue to hinder integrated and effective ocean governance in the EU. The Ocean Act offers a timely opportunity to address these challenges by strengthening ecosystem-based management (EBM) maritime spatial planning (MSP), applying the source-to-sea approach as an integrated policy framework to address land-sea interactions, enhancing sea-basin cooperation, coordinating ocean observation, and streamlining reporting. Drawing on CrossGov's empirical analyses, sectoral roadmaps, and coherence assessment methods, this submission outlines concrete, evidence-based actions that can help the Act establish a more coherent, resilient, and future-proof governance framework for Europe's seas.



Main findings from the CrossGov project

- Systemic fragmentation - legal asymmetries, institutional silos, procedural misalignments - undermines delivery of the Ocean Pact priorities. Policy coherence must be made an explicit design and implementation principle in the Ocean Act.
- Environmental frameworks (MSFD, WFD, Habitats/Birds, Nature Restoration) are routinely outweighed in practice by sector instruments with binding targets and streamlined permitting (e.g., RED III for offshore wind) - creating asymmetric obligations and permitting that adversely affect biodiversity outcomes.
- Sea-basin governance is essential to resolve crossborder conflicts, coordinate cumulative impact management, and align Member States' marine strategies and MSPs. Regional Sea Commissions and structured fora should be leveraged.
- Monitoring and reporting remain fragmented; digitalisation, standardisation and joint planning can lower costs, reduce duplication, and target knowledge gaps relevant to MSP and conservation.
- CrossGov provides tested methods and roadmaps to operationalise coherence and cross-compliance in European ocean governance.



Concrete recommendations for the Ocean Act

1 Make MSP and sea-basin governance coherence-based by design

To address systemic fragmentation and ensure that MSP and sea-basin governance deliver on EU climate, biodiversity, zero-pollution, energy, food, and security objectives, the Ocean Act should embed coherence as a mandatory planning principle and require a set of integrated procedures:

→ Establish a Policy Coherence mandate & statement in MSP and sea-basin planning

Require Member States, when updating MSP and when contributing to sea-basin plans, to produce a public "Coherence Statement" that (i) references all relevant EU targets (biodiversity, climate, zero pollution, energy, transport, food, security), (ii) identifies conflicts and synergies, and (iii) justifies the chosen resolution pathway (avoid–minimise–offset; sequencing; conditional permitting). The Act should specify minimum content and require that coherence be evidenced before plan adoption. CrossGov shows that explicit target referencing and trade-off documentation are critical to overcome fragmentation; our Policy Briefs 6 & 7 set out content expectations suitable for legislation and guidance.

→ Require sea-basin Coherence Plans with shared procedures and conflict resolution

Beyond aligning MSP with MSFD, the Act should mandate integrated seabasin management plans that harmonizes Member State MSP choices, reference binding EU targets, and include standard procedures for crossborder conflict resolution (e.g., agreed rules for energy- biodiversity trade-offs; methods and thresholds for cumulative impacts). Regional Sea Commissions and Commission-Member State fora should be explicitly tasked to facilitate and document these procedures. CrossGov highlights sea-basin scale as the functional level for resolving spatial squeeze and cumulative effects; Policy Brief 6 emphasises that coherence requires common baselines, shared rules of procedure, and joint monitoring and reporting.

➔ **Make MSP coherent by design using the three CrossGov Roadmaps**

Attach (via implementing acts or guidance) operational checklists, as those derived from CrossGov's roadmaps to steer MSP updates and permitting:

- *Offshore wind & biodiversity*: early strategic and cumulative assessment; ecological sensitivity mapping; avoidance of high value habitats/corridors; adaptive design; biodiversity-aligned permitting milestones; integration of mitigation measures in planning and design.
- *Fisheries & biodiversity*: ensure fisheries management measures inside MPAs match conservation objectives; align CFP measures with MSFD descriptors; strengthen monitoring/enforcement where spatial protections exist.
- *Agriculture–marine pollution (land–sea)*: align CAP instruments and conditionality with WFD/MSFD load-reduction trajectories for eutrophication hotspots affecting coastal waters.

These checklists are drawn directly from CrossGov's sectoral evidence and provide recommendations for Member States and sea-basin bodies to reduce conflict and accelerate target delivery. Other projects may have additional recommendations, that could contribute to operational checklists.

➔ **Standardise a Policy Coherence Assessment protocol under the Ocean Act**

Require Member States to conduct a Policy Coherence Assessment for MSP updates and sea-basin plans using a uniform method covering horizontal (across policies) and vertical (EU–national) coherence, with evidence templates for problem diagnosis and solution design. The Commission should adopt an implementing act specifying the minimum analytical steps, data fields, and documentation, aligned with the Better Regulation.

CrossGov's Handbook provides a Policy Coherence Assessment methodology already tested in EU marine policy contexts and ready for practitioner use - including explanatory factor analysis to identify root causes of incoherence. The methodology is suited to supplement the Better Regulation guidance.

2 **Ensure coherent sector implementation through cross-compliance checks and permanent coordination mechanisms**

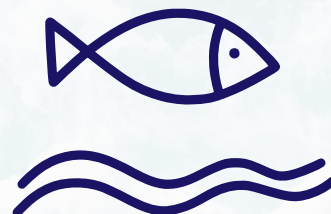
To reduce asymmetric implementation where sectoral decisions undermine environmental objectives, the Ocean Act should establish accountable sector coordination and cross-compliance mechanisms:

➔ **Introduce Cross-Compliance Checks for sector decisions affecting the sea**

Make significant sectoral decisions (e.g., designation of offshore wind zones, large port expansions, CAP funding in sensitive catchments) subject to a Cross-Compliance Check demonstrating compatibility with MSFD/WFD/NRR objectives and MPA conservation measures before adoption. Where non-compliance risks are identified, require mitigation hierarchies and/or conditional approvals tied to ecological outcomes. CrossGov's report (D3.7) shows how such checks can be structured across CFP, RED III, and CAP, drawing on case evidence to ensure sector implementation supports environmental outcomes rather than displacing risks.

➔ **Create permanent inter-authority coordination mechanisms with clear mandates**

Require each Member State to designate a standing interministerial ocean coherence board (environment, energy, transport, agriculture, fisheries, defence) with a legal mandate to: (i) oversee the Policy Coherence Assessment and Cross-Compliance Checks, (ii) publish decisions and rationales, and (iii) address unresolved issues. At the EU level, formalise a Commission-Member State forum for ocean observation and MSP coherence (including Regional Sea Commission participation) with minutes and action logs. CrossGov's policy briefs emphasise that coherence failures often stem from institutional silos; a formalised, recurring coordination structure is necessary to turn coherence into standard operating practice.



3 Modernise reporting, indicators, knowledge systems, and guidance to support transparent and evidence-based governance

To support coherent decision-making across planning and implementation, the Ocean Act should create a modern governance infrastructure that standardises reporting, elevates science–policy–society (SPS) interfaces, and ensures coherence in all guidance:

➔ Digitise and standardise reporting with coherence indicators

Mandate one common digital template (API-ready) for MSP/sea-basin planning, Policy Coherence Assessments, and Cross-Compliance Checks; define a minimal set of coherence indicators, e.g.:

- % of MPA area covered by fisheries measures aligned with conservation objectives;
- % of new offshore wind capacity allocated outside high sensitivity zones;-sensitivity
- Nutrient load trends vs. WFD/MSFD trajectories in priority basins;
- Share of monitoring practices conducted jointly/with shared datasets.

This enables automation, comparability, and burden reduction. CrossGov recommends streamlining and standardisation to reduce duplication and enable better monitoring of coherence outcomes. The Act's reporting simplification objective is an ideal anchor for this.

➔ Institutionalise Science–Policy–Society (SPS) interfaces in MSP/sea-basin processes

Require that MSP and sea-basin plans include a documented SPS interface design: who advises whom, at what stages, with what procedures for handling uncertainty and multiple knowledge systems (scientific, local, traditional). Include minimum expectations for early stakeholder inclusion and transparent feedback.

CrossGov's SPS Blueprint and briefs show how structured SPS interfaces improve legitimacy, reduce contestation, and enhance the uptake of coherent solutions across competing interests

➔ Apply an EU level Coherence test to guidance under the Act

Before adopting delegated/implementing acts or technical guidance under the Ocean Act, the Commission should apply a Coherence Test to ensure new instruments reinforce climate– biodiversity–pollution synergies and do not re-introduce asymmetries (e.g., procedural fast-tracks that sideline ecological objectives). Publish the results.

CrossGov Policy Brief 7 outlines how to embed coherence systematically across the Ocean Pact's six priorities and into future Ocean Act instruments; the Handbook provides a practical test procedure.



Expected Impacts

By strengthening policy coherence, particularly within and across maritime spatial planning processes, the proposed measures will make ocean governance more efficient, predictable, and widely supported. Coherent MSP, aligned with shared EU targets and supported by standardised digital templates and coordinated ocean observation, will reduce administrative burdens and ensure that evidence, assessments, and data are used consistently across sectors and governance levels.

The Ocean Act can be the legal cornerstone that transforms piecemeal ocean governance into a coherent system that simultaneously advances climate neutrality, biodiversity recovery, and zero pollution. CrossGov's methods and roadmaps are ready to implement and suitable for the Act's objectives on MSP modernisation, sea-basin governance, observation coordination, and reporting simplification.



Links to the supporting CrossGov evidence

[Policy Coherence Handbook](#) - An easy guide to assess and understand policy coherence (2025).

Policy Briefs:

- [Policy Brief 2](#): Coherence in policy landscapes and design (2024).
- [Policy Brief 3](#): Coherence among planning systems established under three Directives: WFD, MSFD, and MSPD (2025)
- [Policy Brief 4](#): Integrating marine biodiversity and ecosystem protection in sector policy implementation: How to do better (2025).
- [Policy Brief 5](#): Policy brief on challenges and opportunities to strengthen SPS interfaces (2025)
- [Policy Brief 6](#): Strengthening policy coherence in EU coastal and marine governance: Key recommendations (2025).
- [Policy Brief 7](#): Embedding policy coherence in the Ocean Pact and future Ocean Act: A strategic blueprint (2025).
- [Joint Ocean Pact Policy brief](#): A European Oceans Pact to enhance Ocean Governance (2025)

Roadmaps:

- [Offshore Wind Energy & Biodiversity Protection](#) - Roadmap to Enhanced Policy Coherence (2025)
- [Fisheries & Biodiversity Conservation](#) - Roadmap to Enhanced Policy Coherence (2025)
- [The Marine Environment & Agriculture Pollution](#) - Roadmap to Enhanced Policy Coherence (2025)

Relevant reports:

- [Horizontal coherence in EU law and policy](#): Analysing, explaining and improving the horizontal coherence of EU policy design (D2.2)
- [Cross-Compliance in Policy Integration](#) (D3.7)
- [Cross-Compliance in integrative planning](#) (D3.6)

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