CrossGov

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

Deliverable 3.5

Policy briefs on policy coherence and cross-compliance in integrative planning and policy integration

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Abstract	This Deliverable D3.5 presents the two policy briefs that have been designed in WP3. The first one presents the results of CrossGov's Task 3.2, which investigates the coherence among planning systems established under three EU Directives: the Water Framework Directive (WFD), the Marine Strategy

	Framework Directive (MSFD), and the Maritime Spatial Planning Directive (MSPD). The analysis is based on four case studies located in the Finnish Archipelago, the North Adriatic Sea, the French Mediterranean Sea, and the Oslo Fjord. The second policy brief explains how the main EU Green Deal ambitions in relation to zero pollution, marine biodiversity preservation and climate resilience are considered when implementing key agriculture, fisheries, aquaculture and renewable (offshore wind) energy policies.
Keywords	Coherence; WFD; MSFD; MSP; Planning processes; Eutrophication; Marine-based activities; Land-based pollution; Marine planning; Synergies ; Challenges; Local level; Misalignment; Authorities; Cross-compliance; European Green Deal; agriculture, fisheries, aquaculture, offshore wind energy, marine biodiversity, zero pollution, climate resilience.

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1. Introduction

The CrossGov project aims at enhancing knowledge on how coherence and cross-compliance of European marine related policies affect the ability to realize the European Green Deal (EGD) objectives related to protection of marine biodiversity, climate resilience, and zero pollution. This deliverable presents the final policy briefs from WP3. Work Package 3 explores, by means of case study approach, the reality of implementing several legal and policy frameworks simultaneously. Two tasks are part of WP3: **Task 3.2** studies the coherence of the three sets of planning systems from the three EU framework Directives: Water Framework Directive (WFD), Marine Strategy Framework Directive (MSFD), and Marine Spatial Planning Directive (MSPD). The task also explored whether the planning processes associated with the MSFD, WFD, and MSPD operate in cross-compliance to support the delivery of the EGD of zero pollution and marine biodiversity objective. **Task 3.3** explores how selected sectors (agriculture, fisheries, aquaculture, and offshore wind energy) internalise the environmental requirements from the three framework Directives through policy instruments (i.e. impact assessments, funding conditionalities, environmental assessments or authorisations processes), and also, how the three EGD objectives of focus (marine biodiversity, climate resilience, and zero pollution) are, or can be internalized (mainstreamed) into these sectoral policies.

Policy brief 3 describes how governance aspects and mechanisms applied by national and local authorities can contribute to advancing policy coherence across the three planning systems pursuant to the WFD, MSPD and MSFD. The four case studies explored are located in the Finnish Archipelago, the North Adriatic Sea, the French Mediterranean Sea and the Oslo Fjord.

Policy brief 4 describes how the main EU Green Deal ambitions in relation to zero pollution, marine biodiversity preservation and climate resilience are considered when implementing key sector policies related to agriculture, fisheries and aquaculture and renewable (offshore wind) energy. It builds on the research carried out in 8 CrossGov case studies that applied the CrossGov Policy Coherence Assessment and Science-Policy-Society Interface (SPSI) Framework. These case studies covering a diversity of contexts and scales are: the Finnish Archipelago Sea; the Baltic Sea Basin; the Norwegian, Dutch and German North Sea; the Northern Adriatic Sea; the French Mediterranean Sea; and the Mediterranean Sea.

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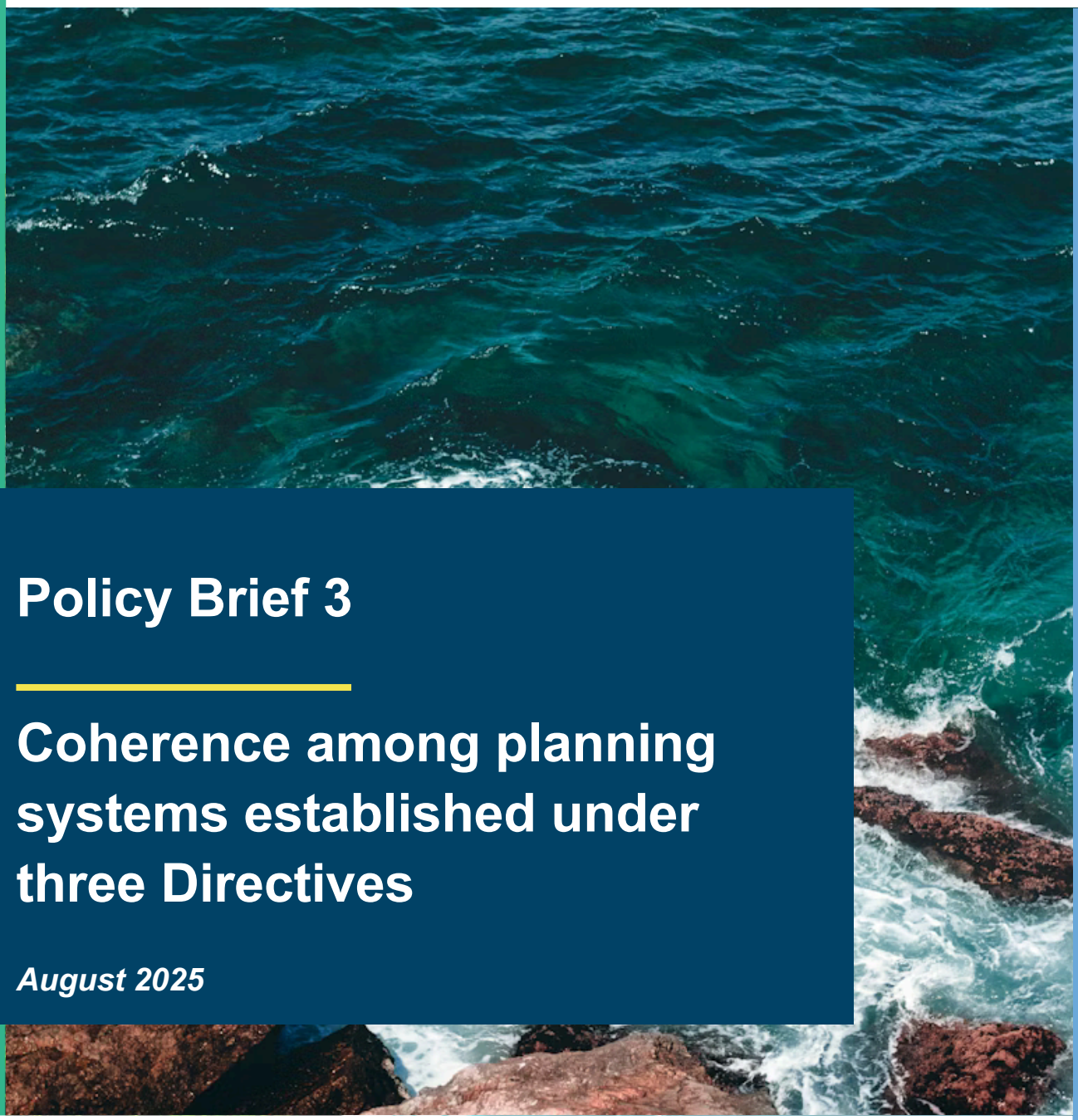

Policy Brief 3

Coherence among planning systems established under three Directives

August 2025

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Coherence among planning systems established under three directives: the Water Framework Directive (WFD), the Marine Strategy Framework Directive (MSFD), and the Maritime Spatial Planning Directive (MSPD)

The European Union's WFD, MSFD, and MSPD have distinct yet interconnected objectives aimed at protecting and sustainably managing Europe's water resources, as well as its freshwater and marine environments (Box 1).

Which synergies, but also conflicts, appear in the operational implementation of these directives?

This question was explored through four case studies (see Box 2). Findings highlight mechanisms and practices applied by national and local authorities that contribute to policy coherence across the planning systems associated with these directives (horizontal coherence).

The analysis demonstrates that strengthening horizontal coherence would also support the achievement of the of the European Green Deal (EGD) objectives on zero pollution and marine biodiversity (see Box 3).

Box 1: The WFD, MSFD, MSFD were designed to provide a structure for integrating diverse sectoral policies in a holistic and coordinated way, rather than directly regulating specific sectors covered by other legislation (e.g., fisheries -Common Fisheries Policy, agriculture - Common Agriculture Policy).

At the national and local level, instruments such as River Basin Management Plans (RBMP), Marine Strategies (MaS), and Maritime Spatial Plans (MSP) -collectively referred to in this publication as the *planning systems*, help operationalize these directives by setting objectives and guiding national strategies, programmes of action, and monitoring programs. Complementary EU and national legislation, such as the Urban Wastewater Treatment Directive, the Sustainable Use of Pesticides Directive, and the Nitrates Directive, also contribute by addressing specific pressures on inland and marine waters through targeted measures for pollution control, water quality, and risk management.

This policy brief offers a selection of mechanisms and practices applied by national and local authorities to advance policy coherence across the three planning systems. It also provides an overview of identified areas of policy incoherence and corresponding co-created solutions or transferable lessons from the case studies.

The Horizon Europe CrossGov project aims at enhancing knowledge on how coherence and cross-compliance of European marine-related policies affect the ability to realize the EGD objectives related to the protection of marine biodiversity, climate resilience, and zero pollution.

Policy coherence refers to how well different policies work together. When this occurs within the same level of governance, it is called *Horizontal coherence*. When it occurs across different levels of governance, it is referred to as V*ertical coherence*.

Coherence can be defined as the extent to which policies strengthen each other by promoting synergies or reducing conflicts between objectives and measures, both in design and during implementation. In policy landscapes with low coherence, the achievement of multiple objectives may be difficult, and trade-offs often need to be made.

Provided that there is a high level of coherence, policies can also positively reinforce one another by creating synergies that facilitate achieving multiple objectives. At a minimum though, a policy should not hinder progress towards achieving other policies' objectives and targets

See further at the Handbook on Policy Coherence (Platjouw et al., 2025)

Box 2: A case study approach was used to examine the practical realities of implementing multiple EU policies simultaneously, in particular, the planning systems established under the WFD, the MSFD, and the MSPD.

Two aspects were investigated: (i) The coherence among these three planning systems in governing and protecting the marine environment. (ii) Whether the planning processes associated with these directives operate in cross-compliance to support the EGD objectives on zero pollution and marine biodiversity (Box 3).

The analysis is based on four case studies located in the Finnish Archipelago, the North Adriatic Sea, the French Mediterranean Sea, and the Oslofjord.

Two analytical frameworks guided the research: the Policy Coherence Framework (Box 4) and the Science-Policy-Society Interface assessment framework (Box 5).

Detailed information can be consulted in Ramírez-Monsalve et al., (2025)

Box 3: The European Green Deal (EGD) is a comprehensive set of policy initiatives launched by the European Commission in December 2019 to make Europe the first climate-neutral continent by 2050. To achieve this, the EU is focusing on reducing GHG emissions, tackling biodiversity loss, mitigating pollution, increasing the use of renewable energy, driving a shift to sustainable mobility and food systems, and promoting a circular economy.

Addressing pollution and marine biodiversity loss represent two strategic focus areas examined within the CrossGov project. The following outlines key elements associated with each.

Zero Pollution:

- Ambition: Achieve a **toxic-free environment** by reducing pollution from all sources, including air, water, and soil.
- This ambition is operationalized primarily through the EU Action Plan: Towards Zero Pollution for Air, Water, and Soil; other strategies are of support, including the Biodiversity Strategy for 2030, the 2030 Climate Target Plan, the EU Climate Change Adaptation Strategy, and the Sustainable Blue Economy Strategy.
- Among the elements that specifically relate to the **marine environment** are: reduce chemical and nutrient run-off from agriculture and industry that affect coastal and marine waters, and support the transition to a circular economy to prevent plastics and other waste from entering marine ecosystems.

Marine Biodiversity:

- By 2030, 30% of EU seas must be designated as protected areas, with **10% under strict protection (no extractive or industrial activities permitted)**
- Legally binding targets to restore **20% of degraded marine ecosystems** (e.g., seagrass meadows, oyster beds) by 2030 and all ecosystems by 2050.
- Biodiversity considerations must be integrated into all EU policies, including fisheries, energy (e.g., offshore wind), and climate adaptation.

More information on the CrossGov's mapping exercise of the EGD's ocean-related objectives and targets, and the results from stakeholder interviews to understand the complexities of navigating diverse policies can be consulted in, see Boteler et al., (2023) and Boteler et al., (2024)

Advancing policy coherence across the three planning systems

Findings from the case studies illustrate mechanisms and practices applied by national and local authorities that contribute to policy coherence across the three planning systems.

Among these mechanisms and practices, structured according to the coherence attributes and explanatory factors of the policy coherence assessment framework (Box 4) are:

- **Policy objectives** (coherence attribute). For example, mandatory alignment between MSFD measures and RBMP objectives; linking RBMP and MaS to address marine nutrient reduction; and integrating WFD and MSFD objectives within the MSP framework.
- **Policy Measures** (coherence attribute). For example, a unified strategic framework aligning MSFD and MSP requirements; coordinated monitoring activities across WFD, MSFD, and MSP; measures designed with consideration for environmental and economic interactions; coordination between MSP and terrestrial planning instruments; and a cross-sectoral action plan layered into existing planning instruments.
- **Governmental organizational structures** (explanatory factor). For example, the presence of coordinating agencies facilitating integration of MSFD, WFD, and MSP governance; and the availability of multidisciplinary expertise in both freshwater and marine domains among civil servants in freshwater agencies.
- **Science-policy-society interfaces** (explanatory factor). For example, environmental agencies collaborating with universities and research institutions not only as knowledge providers and policy advisors, but also as knowledge brokers and boundary organizations; and the presence of a consultative council that ensures representation across sectors and governance levels.
- Regarding **stakeholder engagement mechanisms** (explanatory factor) no positive learning experiences were identified in the case studies. Stakeholder involvement related to the WFD, MSFD, and MSP continues to occur in silos, with each policy maintaining separate engagement processes. Public consultations are conducted independently for each policy and are sometimes criticised for lacking sufficient participatory depth

More detailed information can be seen in Table 1.

Box 4: The Policy Coherence Framework allows to understand where in the policy cycle (design and/or implementation) or at which governance level (EU, national, sub-national) problems or challenges of coherence emerge.

This methodological approach is based on two components:

- **Coherence attributes** (policy objectives and policy measures) assessing the level of policy coherence, and
- **Explanatory factors** (governmental organizational structures, science- policy-society interfaces, and stakeholder involvement) understanding the reasons for policy (in)coherence

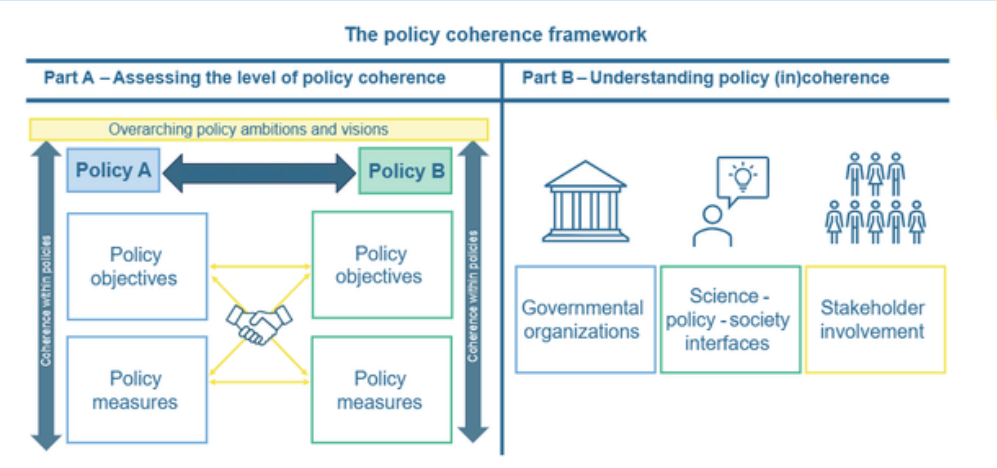


Figure 1: The CrossGov policy coherence framework

Further information on the evaluation framework can be found in the Handbook on Policy Coherence (Platjouw et al., 2025)

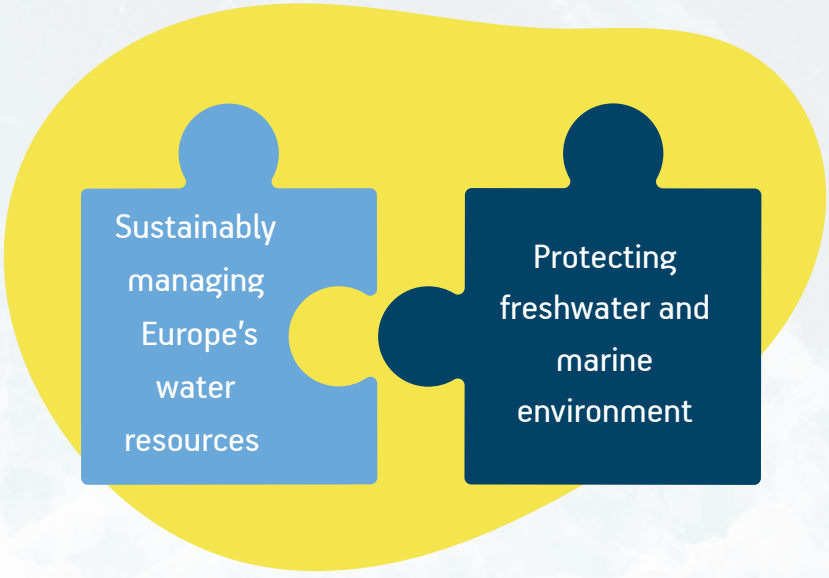
Table 1: A selection of aspects and mechanisms applied by national and local authorities to advance policy coherence across the three planning systems and structured according to the coherence attributes and explanatory variables of the policy coherence assessment framework.

Policy objectives: Cross-referencing each other; mutually supportive or in potential conflict			
North Adriatic	**French Med**	**Finnish Arch**	**Oslofjord**
Complementarity WFD and MSFD objectives. Alignment of WFD and MSFD Objectives: mainly regarding biodiversity,	Mandatory alignment between the Façade strategic Document (MSFD+MSPD) measures and the SDAGE (RBMP) objectives.	Linking RBMP and MaS to address marine nutrient reduction.	Synergistic objectives in the RBMPs and IOMP (MSFD*).
Integration of WFD and MSFD objectives within the MSP framework.			

Policy measures: Strategic tools or mechanisms used to achieve policy objectives			
North Adriatic	**French Med**	**Finnish Arch**	**Oslofjord**
	A single strategic framework aligning the requirements of MSFD and MSP.	WFD and MSFD transposed into Finnish legislation in the same act.	
Coordination of WFD, MSFD and MSP monitoring activities.	Coordinated WFD and MSFD monitoring.	Integrated coastal and marine monitoring. Aligned coastal-marine eutrophication indicators and objectives.	
	Measures defined taking into consideration environmental and economic interactions.		The Oslofjord Plan as a positive example of institutional layering, that has increased the coherence across existing planning instruments and positively contributes to the alignment of objectives and instruments across sectors.
Coordination of the Adriatic MSP with terrestrial planning instruments.			

Governmental organizational structures: Set the framework for policy formulation and implementation (relevant organizations, their roles, responsibilities, and coordination between them)			
North Adriatic	**French Med**	**Finnish Arch**	**Oslofjord**
Coordinating agencies (e.g. ISPRA, ARPAs) for integrating MSFD, WFD, and MSP governance.	Consultative governance body of the French Mediterranean coast to support synergies in the operational implementation of the WFD, the MSFD, and the	ELY Centres: central role in freshwater management (RBMP) and key regional actor in marine strategy implementation (MaS).	National coordination for WFD and IOMP (MSFD*) under the responsibility of the same governmental organization.
	Multidisciplinary expertise in freshwater and marine domains among Water Agencies (RBMP) civil servants.		

Science-policy-society interfaces: Social processes that outline how knowledge is produced, transferred, and utilized in decision-making			
North Adriatic	French Med	Finnish Arch	Oslofjord
Environmental agencies (e.g. ARPA and ISPRA), together with universities and research institutions, acting not only as knowledge providers and policy advisors, but also as knowledge brokers and boundary organizations.			The Oslojord council: ensuring representation among sectors and governance levels, and increasing societal awareness (understanding that action across the entire catchment is needed to restore the fjord).



Box 5: The Science-Policy-Society Interface Assessment Framework

Science-policy-society interfaces (SPSI) are social processes which encompass relations between several actors in the policy process and which allow for exchanges, co-evolution, and joint construction of knowledge with the aim of enriching decision-making.

The framework allows identifying gaps and opportunities to strengthen the connection between different types of knowledge, policymaking, and societal needs through its six building blocks (Figure 3).

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

For further information on the evaluation framework please consult the Blueprint for SPS (Capurso et al., 2025)

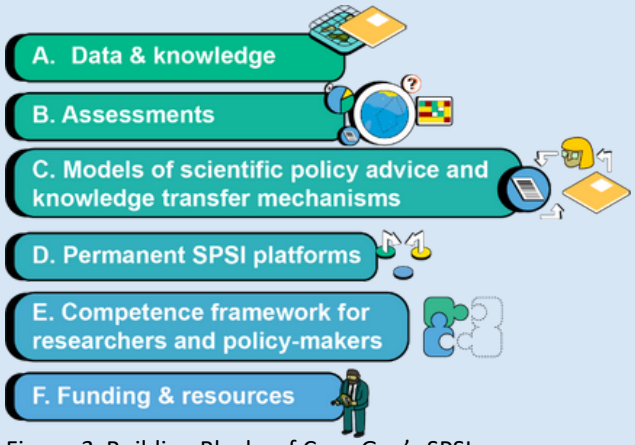


Figure *3*: Building Blocks of CrossGov's SPSI assessment framework

Potential ways to improve coherence

Findings from our case studies highlight areas in need of improvement. For each of these areas, we present either suggestions that emerged during co-creation processes, and/or opportunities for lesson extraction, particularly where operational solutions already exist within one of the case studies. These insights may also resonate with other EU contexts seeking to strengthen integrated marine and water governance in support of EGD goals

Exploit the role of MSP in the integration of environmental objectives into spatial decision-making for marine areas

Situation:	The MSP, although mentioning support for the Good Environmental Status (GES) objectives, does not elaborate on specific measures or collaborative mechanisms with MaS for achieving GES in the marine environment. (Finnish Archipelago case study).
Potential for lesson extraction:	The guidelines for establishing common principles for MSP in Italy states that, in the **process of defining strategic objectives for MSP, coherence with the environmental objectives set out by the MSFD must be ensured**. Among the strategic objectives of the MSP framework related to environmental protection, Objective OS_N|03 explicitly mandates the integration of spatially relevant measures from the MSFD's Programmes of Measures into maritime planning measures (North Adriatic case study).

Strengthen the explicit links from the RBMP to MSP

Situation:	The RBMP plans do not explicitly consider or aim at contributing to the MSP objectives or measures. MSP objectives (such as the planning of areas suitable for aquaculture activities, for the protection of coastal ecosystems, and for the support to blue economy sectors) could be compromised if they are not supported by a robust WFD basin plan (North Adriatic case study).
Suggestion:	Improved alignment of objectives and measures between the RBMP and the MSP would help ensure that land-based actions under RBMP would positively impact the marine environment and the maritime uses planned under MSP.
Suggestion:	Integrate land-based nutrient load data into spatial allocation within the MSP processes. While the MSP may acknowledge the importance of nutrient reduction for marine environmental objectives, the direct integration of land-based nutrient load data into site selection or spatial allocation decisions is generally lacking.

Strengthen local technical competence and implementation capacity

Situation:	Local authorities frequently face implementation challenges due to resource constraints, particularly limited human capacity within supporting institutions. Although these institutions provide support services, there are not enough human resources to respond to all requests. As a result, local authorities sometimes abandon efforts to develop a more integrated management plan that could cover all requirements, instead prioritizing solutions that are more feasible within their limited resources and guidance.
Suggestion:	Strengthening collaboration with local authorities, building local capacity through targeted training and knowledge-sharing, optimizing internal workflows, streamlining administrative procedures for project approval and funding, and forming public-private partnerships to supplement the workforce, are some of the actions that can address insufficient staffing levels.
Suggestion:	A continuous system of funding is needed to ensure stable human resources and to fund research and capacity building. Ad hoc projects and initiatives are not enough to offer capacity-building activities and trainings to improve the competence framework of national and local authorities, but also more long-term institutional funds.

Strengthen the science-policy interactions between terrestrial, coastal and marine water governance

Situation:	Even when responsibilities for the WFD and MSFD are housed within the same ministry, intra-organizational collaboration often remains weak, with a sharp divide between the two planning processes and limited integration of marine expertise into water governance, and vice versa.
Potential for lesson extraction:	Each water agency (in charge of RBMP) has a service or an expert dedicated to marine coastal areas (2-3 person). One point underlined by many experts in France is that the Water Agency from the Mediterranean coast has achieved positive impacts and projects on the Mediterranean Sea, partly because it has created a marine service and it has integrated deeply qualified marine environment experts into its teams, providing strategic advice and active involvement. Besides, the involvement of Water Agency supports the land-to-sea continuum (French Mediterranean case).
Potential for lesson extraction:	A French-water **coastal committee** has been created for coastal municipalities to support the specific implementation of freshwater measures impacting the marine environment (French Mediterranean case).

Progressively develop an integrated land-sea stakeholder engagement process

Situation:	Stakeholder involvement related to the WFD, MSFD, and MSP has largely occurred in silos, with each policy operating its own engagement processes. Public consultations are managed separately for each policy and are sometimes criticised for not being sufficiently participatory. In addition, decisions are often made at a national scale with few considerations of local specificities and obligations, which can create frustration and incoherence with local stakes (e.g. Lack of clear understanding of mandates, insufficient capacity to implement top-down approaches, lag in policy implementation to align local level practices with national level priorities).
Suggestion:	**Coordinate consultation processes across different policies in a phased manner** to establish an integrated stakeholder engagement framework. This will help support more holistic sea management i.e. land-sea interaction, and "source to sea" approach (see example ideas below).
Suggestion:	**Structured feedback channels, institutionalized mechanisms that systematically collect, process, and incorporate local input**. For example, a regional maritime council with a formal process for reporting back to stakeholders on how their input shaped the final plan, digital platforms for submitting local concerns, and a reduction of administrative burden of policy and reporting for local stakeholders. These mechanisms would allow for continuous input, review, and adjustment of plans based on stakeholder feedback and new information. In addition, managers and people involved in the marine environments at the local level have emphasized the importance of strong political support, sufficient time, and **open dialogue with civil society** and businesses to ensure that the measures are accepted.
Suggestion:	**Stakeholder engagement can be deepened by involving more key NGOs**. These organizations are often engaged in the MSFD and MSPD program of measure, bringing strong scientific expertise and maintaining good relationships with local populations. The role of key NGOs has been highlighted as essential in bridging the gap between state services which are often met with public skepticism, and local economic actors. NGOs also play a crucial role in raising awareness on the importance of environmental regulations.
Potential for lesson extraction:	Establishment of **stable multi-actor platforms** and **structured consultation mechanisms** across policies and across actors. This is something that the "*Report: operational proposal for the start of the implementation and monitoring phase of the plans*" (2024) supports as one on the actions to prioritise, by envisaging hearings held by the Ministry of Infrastructure and Transport on topics relevant to MSP, involving public administrations, associations and sector operators, research institutions and universities, and civil society organizations (North Adriatic case study).

Strengthen a structured coordination across all governance levels

Situation:	Despite the existence of high-level coordination mechanisms where synergies between MSFD, WFD, and MSP are enabled, there is the need for further strengthening the cross-policy integration at all governance levels.
Suggestion:	**Strengthening the role of one existing local agency** to act as a central coordinating body, addressing the overlapping responsibilities and coordination challenges between institutions. This could be complemented by measures such as harmonizing reporting requirements and establishing a unified environmental monitoring platform to improve data integration. In addition, clarifying the distribution of funding responsibilities among competent authorities would enable a single point of contact to address sectoral policy issues, such as environmentally harmful subsidies.
Potential for lesson extraction:	Creation of technical working groups: e.g. one on land-sea interactions (bringing together representatives of the processes under MSP – WFD – Floods Directive – Port development – Spatial and landscape planning); another one on MSP – MSFD – Biodiversity Strategy 2030 (Protected Areas and Restoration) – Fisheries Policies (North Adriatic case study).
Potential for lesson extraction:	To support synergies in the operational implementation of the WFD, the MSFD, and the MSPD, as well as to address broader Mediterranean maritime issues, France has established the Maritime Façade Council CMF. This consultative body brings together over 50 different actors including state representatives, state services at sea and inland, freshwater representatives, university experts, work union representatives, and NGOs. The CMF meets twice a year to discuss and provide recommendations on strategic orientations for the Mediterranean Sea, while more targeted work is undertaken by specialized technical committees focusing on topics such as MPAs, marine renewable energy, and maritime employment (French Mediterranean case study).
Potential for lesson extraction:	Oslofjord plan, a positive example of institutional layering, that has increased the coherence across existing planning instruments and positively contributes to the alignment of objectives and instruments across sectors. The plan uniquely integrates policy objectives and instruments across multiple sectors, including land use, agriculture, sewage, fisheries, spatial management, invasive species control, heritage, and climate initiatives.

Concluding remarks

These findings are timely, as the European Ocean Pact will, among other goals, provide a strategic framework to harmonize and integrate various ocean-related policies and activities. The path towards effectively governing European seas requires coherent policy actions that account for cross-compliant interactions across sectors, interests, and governance levels.

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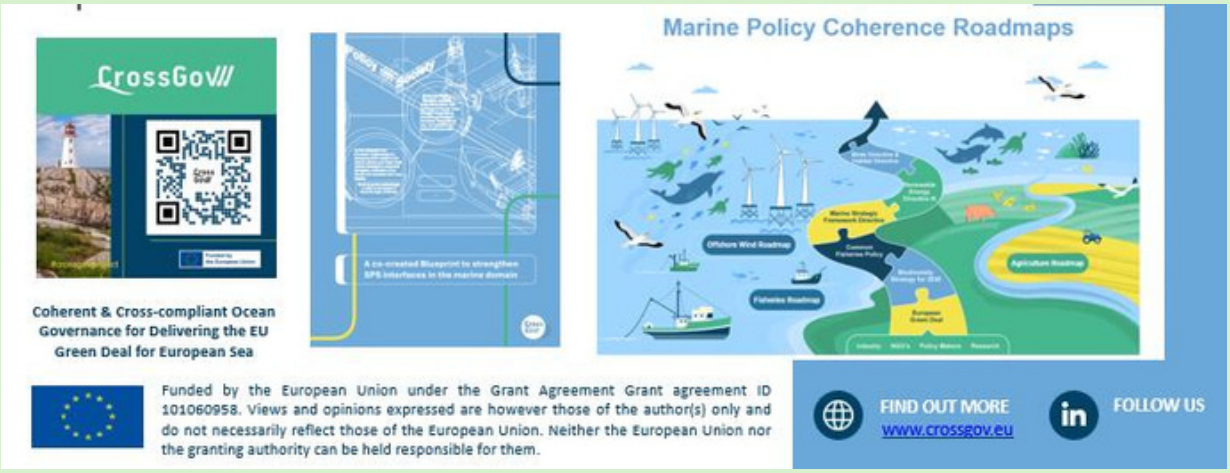

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Policy brief 4

Integrating marine biodiversity and ecosystem protection in sector policy implementation: How to do better[1]

Mainstreaming biodiversity in sector policies and decisions: a must!

The **European Green Deal** (EGD), adopted in 2020, calls for deeply transformative policies across all sectors to create a fair and prosperous society where economic growth is decoupled from resource use, natural ecosystems are protected and restored, and human health improved. Delivering the ambitions of the EGD requires: (1) **strengthening policy coherence and integration** based on *intense coordination to exploit the available synergies across all policy areas*; (2) putting ***sustainability at the centre*** *of economic policy*, *with the sustainable development goals* [of the 2030 Agenda for Sustainable Development] *at the heart of the EU's policymaking and action*; and (3) ***mainstreaming sustainability*** *in all policies*.

Strengthening policy coherence and integrating environmental considerations into sectoral policies have been part of EU policy conversations since the emergence of the EU environmental policy framework and the concept of sustainability (dating back to the publication of the Report of the World Commission on Environment and Development (the Brundtland Report) in 1987). Still, **integrating environmental, ecosystem and biodiversity considerations into sectoral policy has proven challenging.** This is illustrated, for instance, by the successive reforms and revisions of the Common Agriculture Policy (CAP) since 1992, which for the first time introduced new obligations for farmers to protect the environment. Yet, biodiversity goals remain difficult to fully embed. In the marine domain, integration receives particular attention in the framework of the EU Common Fisheries Policies (CFP). More recently, mainstreaming biodiversity and marine ecosystem protection into the development of the blue economy (e.g. renewable energy, tourism, transport) has gained attention in policy and political debates, as a result of the significant developments of blue economy sectors and the increasing public policy support, they receive.

Opportunities for marine biodiversity to sit at "*sectors' tables*"

Integrating biodiversity goals, targets, principles and considerations into sector policies can take place at different stages of the policy development process:

- **Designing policy at the EU scale**, within political processes of the European Council, the European Parliament and the European Commission require mechanisms (e.g. public consultations, inter-service consultation, ex-ante impact assessments, trialogues) which allows for synergies and possible contradictions between policies to be considered and

[1] Words and sentences in *italic* in the policy brief are direct extractions from original documents/texts.

conditions for enhancing biodiversity in sector policies[2] established; These processes can and should be used to embed biodiversity considerations from the outset of EU policy design.

- **Transposing EU regulation into the national regulatory framework**. This stage offers an opportunity to ensure national policies uphold the biodiversity objectives set at the EU level design.
- **Implementing policies** and setting conditions for their (effective) translation into operational (private and public) decisions, by: developing (strategic) plans scrutinised through Strategic Environmental Assessments; setting dedicated governance mechanisms (e.g. institutional procedures, dialogue platforms…); establishing adequate financing conditionalities; or, strengthening knowledge systems and capacity required for implementing policy requirements and delivering set targets and objectives.
- **Translating policy requirements into action** at the operational level with changes in practices and investments (guided by Environmental Impact Assessments) by public bodies and private operators. This could mean new requirements for businesses and public authorities to adopt nature-friendly practices and invest in biodiversity-friendly technologies.

As highlighted by CrossGov research, by design and on paper, EU policies need to account for other policies thereby contributing to policy coherence and integration, although with potentially different levels of (legal) obligations across policies. When implemented, however, challenges and misalignment arise with policies that can sometimes work against each other, with opportunities for integration foreseen in regulations remaining largely unexploited. This applies among environmental directives (aligning the Water Framework Directive (WFD), Habitat Directive (HD), Marine Strategy Framework Directive (MSFD) and Maritime Spatial Planning Directive (MSPD)), but even more to the integration between sector policies (e.g. energy, agriculture, fisheries) and those focused on nature and biodiversity (e.g. Birds & Habitats directives, WFD, MSFD). Strengthening coordination and cross-compliance between those policy domains is essential to avoid sector policies undermine the objectives of biodiversity policies.

Facilitating the integration of marine biodiversity (protection) in sector policy implementation

Options to strengthen (marine) biodiversity and ecosystem protection in sector policy implementation include:

- Establish **transversal governance mechanisms** that promote integrated ecosystem management and reduce siloed operations among organizations responsible for different policies. Integrated management bodies could ensure different sectors work together towards the achievement shared ecosystem restauration objectives.
- Allocate (sector policy-related) targeted **financial resources** to prioritize the reduction o removal of unsustainable practices; this could involve conditioning subsidies on biodiversity-friendly outcomes or dedicating a portion of budgets to restoration and conservation projects in each sector.

[2] The integration of biodiversity into sector policy implementation or a better application of biodiversity policy provisions can also be the focus of infringement procedures by the European Commission when an EU country fails implementing EU law fully or in part following complaints from citizens, businesses or other stakeholders or the Commission's own investigation.

- Support **multi-use and nature-positive approaches** (including setting conditionalities in financing instruments to support such practices) that can, e.g. integrate renewable energy and ecosystem restoration.
- **Strengthen legal requirements** to integrate biodiversity conservation into **sectoral practices**, moving beyond voluntary measures practised, that rely on the goodwill of professionals or authorities; enforceable standards ensure that biodiversity integration is not optional.
- Set ecological standards in permitting: Make marine ecological aspects more explicit in (integrated) **permitting systems,** establishing standardised approaches to account for minimum (marine) ecological standards in permits (eg.,habitat disturbance thresholds, biodiversity offsetting obligations) in sectors like offshore energy, aquaculture or coastal development; this makes ecosystem considerations part and parcel of decision-making for every project.
- Set (marine) biodiversity protection-related obligations or targets in (competing) public **tender procedures**.
- Enhance **data and knowledge transparency, sharing and accessibility**, including by: strengthening data-sharing mechanisms between government agencies, developers, and researchers from the biodiversity and sector communities; developing a single ocean knowledge system co-managed by institutions representing different policies and sectors (e.g. environment, fisheries, transport, energy); harmonizing data, reporting and assessments among different policies and policy domains.
- Elevate (marine) biodiversity as a **political priority**, including by strengthening biodiversity literacy and biodiversity policy literacy (in terms of ambitions, priorities, actions, conditionalities, governance) of sectors' policy makers and stakeholders; this involves training and awareness programs about the value of marine ecosystems and the goals of biodiversity policy.
- Develop and strengthen public and stakeholders' **deliberation, deliberative governance** and collective processes **across policies**; (stakeholder forums, cross-sector roundtables and citizen assemblies to bring diverse perspectives to the table. Such participatory processes build trust and mutual understanding, making it easier to find integrated solutions and increasing buy-in for trade-offs.
- **Strengthen the application of Strategic Environmental Assessments (SEA)** so that insights gained influence plans or project approval and that SEAs do not remain exercise on paper, by: carrying out early and meaningful public engagement; improving transparency of how decisions are made; ensuring that long-term, ecosystem-wide and cumulative effects are thoroughly evaluated and duly considered; integrating SEA outcomes into planning and decision-making processes.

Box 1 – Setting incentives at the EU-level to strengthen integration

Efforts made at implementation by Member States and key responsible bodies can be facilitated by EU-level actions besides formal infringement procedures, as presented in CrossGov Policy Brief #2. These include, for example: (1) stronger steering from the EC towards more effective and coherent implementation of fragmented legislation on marine biodiversity protection implementation; (2) continued enforcement action to mitigate agricultural nutrient pollution, combined with a stricter application of the Polluter Pays Principle (PPP) through a result-based approach in CAP financing; (3) EU support to the establishment and management of protected areas; or (4) strengthening the application of MSPD provisions to account for MSFD objectives in offshore wind power development (e.g. to establish 'go to' and 'no go' areas for the development of wind power platforms/schemes).

For **agriculture**, while national plans for implementing the CAP take account of environmental requirements, it is unlikely supported voluntary environmentally friendly practices will be sufficient to achieve healthy marine ecosystems and comply with the WFD and MSFD requirements. Strengthening legal requirements on the integration of biodiversity conservation into farm practices is an option that requires further scrutiny and consideration.

In relation to **fisheries policies**, options that can complement existing measures aimed at better integrating biodiversity protection in fisheries practice (e.g. setting science-informed quotas, regulating fishing gears, establishing no-take zones, implementing temporal and spatial fishing restrictions or combating illegal, unreported and unregulated fishing) include: (1) extending the ban on trawling from 3 to 4 or 6 nautical miles (potentially on a seasonal basis); (2) fostering the support for small-scale fishing operating with sustainable methods, enhancing the definition of co-management schemes for protected areas; (3) improving the discussion on biodiversity-related topics in already-existing (fisheries) coordination fora; (4) raising interest of fishers in biodiversity by involving them into biodiversity monitoring schemes; (5) supporting the development of regenerating aquaculture and multiuse platforms. More transversally, the participation of sectoral stakeholders (including private operators) in the WFD, MSFD and MSPD processes could be strengthened to enhance awareness and ownership of solutions proposed for the implementation of these directives. Also, governance and knowledge-sharing mechanisms bringing together the fisheries and biodiversity communities at all scales need to be set or strengthened.

Investigations on **offshore wind energy** highlight the current integration gap with a lack of comprehensive and coordinated data regarding the long-term ecological impacts of large-scale offshore wind farms throughout the entire project lifetime. Overall, there is limited empirical knowledge about long-term effects on migratory birds and mammals, changes to benthic habitats and alterations in overall ecosystem functioning. Moreover, cumulative effects are rarely well-understood or adequately considered in environmental assessments. Thus, authorisations are often granted on the basis of limited scientific knowledge and partial assessments. As a result, the ecosystem-based approach required by the MSFD remains challenging to implement. There is potential for strengthening the alignment between offshore wind planning and integrated management frameworks provided by the MSFD and MSPD by developing clear ecological guidelines for offshore wind energy planning not to be considered in valuable and vulnerable marine areas. For example, if certain areas are crucial for biodiversity (due to reef structures, spawning grounds, migration routes), planners should designate these as off-limits or require stricter mitigation measures. Also, multi-use and nature-positive approaches presents opportunities for integrating renewable energy and ecosystem restoration at the operational scale. Developing unified regional sea roadmaps and visions to deliver healthy and sustainable outcomes would also facilitate dialogue among stakeholders with different interests and deliver high-level integration ensuring climate and biodiversity goals are treated as joint, non-negotiable obligations. Furthermore, transboundary coordination mechanisms should be strengthened to harmonize ecological standards, cumulative impact assessments, and planning methodologies across national borders. Finally, integrating biodiversity conditionalities into economic instruments is expected to support more positive environmental outcomes and favour integration: for instance, including biodiversity criteria in offshore wind farm auctions (e.g., extra points for turbine designs or locations that minimize ecological impact) would reward innovation and care for nature by the industry.

Way forward: seizing opportunities set by the European Ocean Pact

Since the start of CrossGov, the EU marine policy scene has evolved with the adoption of the **European Ocean Pact** by the European Commission in 2025. Similar to the EGD, the European Ocean Pact emphasizes policy integration as key to the delivery of its ambitions, *offering a strategy for implementing existing legislation and achieving policy goals more coherently across sectors*. Policy integration and consideration of (marine) biodiversity and ecosystem protection in sector policies is referred in the European Ocean Pact (see box below). This new high-level commitment offers a chance to address many of the integration challenges identified above, but it will require concrete steps to turn broad principles into action.

Box 2. Strengthening the attention to marine biodiversity and ecosystem health in sector policies: how can the European Ocean Pact help

In addition to the reference to policy coherence in its ambitions, the integration and consideration of marine biodiversity and ecosystem protection in sector policies can be found in many sections of the European Ocean Pact. In particular, the European Ocean Pact:

- Calls for *strengthening and modernising maritime spatial planning as a strategic tool, notably through increased **cross-sectoral coordination** at the national level and through a better organised sea basin approach; This underlines that planning for maritime activities (offshore energy, fishing, shipping, etc.) must involve all relevant sectors and consider ecological objectives together, not in isolation.*
- Stresses the need for a ***source-to-sea** approach* for tackling pollution, strengthened by the recently adopted *Water Resilience Strategy*. *Moreover, the Common Agricultural Policy (CAP) will continue to incentivise sustainable agriculture, including measures to help reduce excess nutrients This integrated view ensures actions upstream (on land or in rivers) support marine biodiversity goals downstream*.
- Highlights the importance of an ***ecosystems-based approach*** that will ensure adequate balance between development and protection;

The European Ocean Pact also proposes **sector-focused measures and actions** aimed at reducing pressures on marine ecosystems, including: (i) promoting *fishing techniques compatible with the conservation of targeted species and habitats within the MPAs concerned;* (ii) supporting future-proved *fishing activities* that are *more sustainable by improving gear selectivity, reducing negative impacts on the marine ecosystem and eliminating incidental catches of sensitive marine species; and* (iii) fostering a *transformative change in maritime transport towards climate neutrality and zero pollution*.

The European Ocean Pact also makes many references to **sustainability,** implicitly referring to the need for an adequate balance and integration between ecological, social and economic dimensions. Examples include the forthcoming *EU **Sustainable** Tourism Strategy;* initiatives on *healthy and **sustainable** food, **clean** and affordable marine renewable energy;* support for the development and deployment of *new **sustainable** business models* for coastal communities*, for instance by incentivising the inclusion of regenerative and restoration activities;* and the promotion of a new *generation of **Sustainable** Fisheries Partnership Agreements (SFPAs) to contribute to a coherent EU approach for **sustainable** fisheries and ocean governance*. However, the Pact does not specify how marine biodiversity and ecosystem health and protection will be explicitly accounted for in relation to sustainability, a balance that will need to be clarified within the framework of the different initiatives mentioned.

Beyond EU borders, marine biodiversity is a central component of the international ocean governance pillar of the European Ocean Pact. The Pact expresses strong support for: (i) the BBNJ agreement, including supporting its *swift ratification, rapid entry into force, implementation, and ensuring the sustainable governance of the High Seas are*; (ii) an ambitious *Global Plastics Treaty to curb ocean pollution; (iii)* the designation of *three vast marine protected areas in the Southern Ocean as the best way to conserve Antarctica's unique and pristine marine ecosystems and biodiversity; (iv) the protection of 30% of the High Seas by 2030*; (v) a *precautionary stance on deep-sea mining, emphasising the need for more research into its potential environmental, biodiversity, and socio-economic impacts; and (vi) the establishment of the International Platform for Ocean Sustainability (IPOS) to enable more effective protection and sustainable management of the ocean*.

Overall, the European Ocean Pact offers a new opportunity to strengthen the integration of marine biodiversity and ecosystem health and protection into sector policies. In the short term, the **revision of the MSFD alongside the review of the MSPD** offers the possibility to enhance the coherence and synergies between these two EU (marine/maritime) policy frameworks, while strengthening the mechanisms for the effective application of Ecosystem-Based Approaches (EBA) and fostering cross-sectoral cooperation. In the longer term, however, more fundamental **shifts will be needed in the overarching EU policy and societal paradigm**. These include: (i) fully accounting for ecological boundaries (e.g. the ecological ceiling) and social foundations (e.g. equity, justice) in the development of the blue economy; (ii) strengthening the application of socio-ecological approaches to the protection and sustainable use of the ocean; and, (iii) placing regeneration, rather than exploitation, at the core of actions and decisions, alongside a fair and equitable distribution of wealth and prosperity.

As more efforts to enhance policy coherence are considered and implemented, novel research and policy questions have emerged. In particular: (1) "**How coherent is coherent enough?**" To what extent should biodiversity, ecosystem health and protection be integrated into the design and implementation of sectoral policies? Are there limits or trade-offs to consider? ; (2) What are the **practical implications, impacts** (costs and benefits, short to long-terms) and **added-value** (and for whom) of different levels of integration of biodiversity and ecosystem protection in sector policies?; What costs or benefits, short-term or long-term, come with fully aligning sector policies with biodiversity goals, and who stands to gain or lose from these changes? (3) What can we learn from past and on-going **politics and political processes** related to marine ecosystem protection and management, in order to design political pathways that enable "better policy integration"?; By examining how marine protection measures have fared in real-world decision-making (successes and failures), we can design better strategies and **political pathways** to advance policy integration in the future. 4) Which narrative on the synergies between biodiversity and sectoral policies can raise political attention if we want the policy integration opportunities offered by the Ocean Pact to be fully seized, particularly considering that biodiversity is not currently high on today's political agenda? Since biodiversity is currently not high on many political agendas, we need compelling stories and evidence of how biodiversity and sector interests can align (for example, how a healthy ocean underpins long-term economic prosperity and community well-being), so that leaders and the public see integration as not only necessary but desirable.

This policy brief has been developed in the context of the EU-funded **CrossGov** project (https://crossgov.eu/) that aims at enhancing knowledge on how coherence and cross-compliance of marine-related policies of the European Union (EU) affect the ability to realize the European Green Deal (EGD) and Sustainable Blue Economy. It builds on the outcome of research activities carried out in its Work Package (WP) 3 entitled *Case studies of cross-compliance*. WP3 has focused on: (1) challenges and mechanisms for strengthening the integration between framework directives: the Water Framework Directive (WFD), the Marine Strategy Framework Directive (MSFD) and the Maritime Spatial Planning Directive – with policy implications presented in CrossGov Policy Brief N°. 3; and (2) **how EU biodiversity and healthy marine ecosystem policy requirements are taken into account in (agriculture, fisheries and renewable energy) sector policies implementation** - which is the focus of the present policy brief.

Research on the integration of ecosystem health and biodiversity into sector policies has addressed three questions:

- Do policy instruments [delivery mechanisms] set for the implementation of sectoral policies adequately internalize key-requirements of EU policies (e.g. MSFD, WFD, MSPD) established to deliver healthy marine ecosystems?
- Do policy instruments set for the implementation of sectoral policies adequately internalize the three EGD objectives of focus in CrossGov?
- What can be learnt from impediments and best practices to facilitate the internalization of the key EGD objectives into sectoral policies?

It builds on extensive research carried out in 8 case studies covering different implementation scales and policy integration challenges as illustrated in the map presented below.

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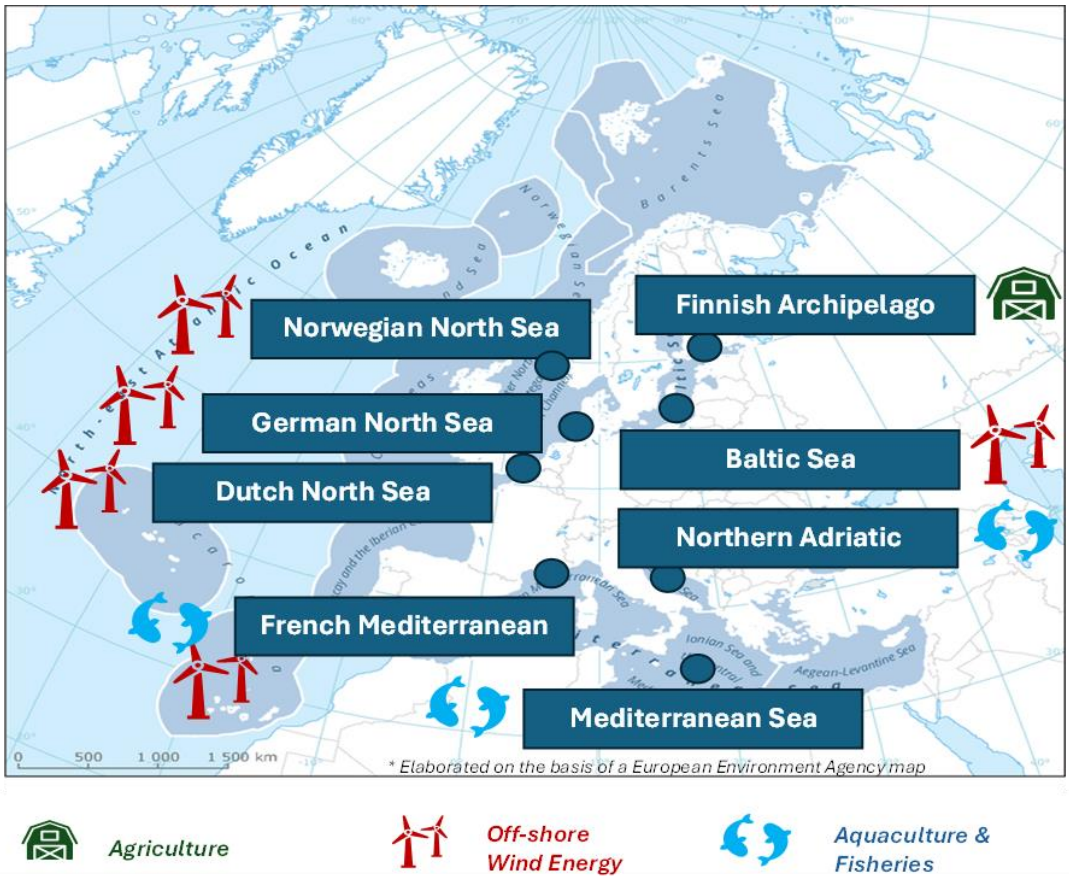

Figure: the case study areas in the Horizon Europe CrossGov project.

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