

Feedback from European Marine Board Secretariat to European Commission's Consultation [on Protecting the environment in the EU's seas and oceans \(review of the Marine Strategy Framework Directive\)](#)  
(13 April 2021)

The EMB Secretariat supports the ambition for holistic protection of the marine environment laid out in the MSFD, however as the 2020 goals have not been achieved, we also welcome this review.

It is critical to view EU policy in a holistic manner. While the ambition for GES in all European waters is to be celebrated, as noted in *Navigating the Future V* ([www.marineboard.eu/publications/navigating-future-v](http://www.marineboard.eu/publications/navigating-future-v)) this is not always supported by other EU policies, and in some cases could be contradictory. It will therefore be important to identify additional policy barriers to implementation, as well as taking a more integrated viewpoint with regards to new initiatives such as the EU Green Deal and the Farm to Fork strategy. Research by Piroddi *et al.* from 2021 ([www.frontiersin.org/articles/10.3389/fmars.2021.596797/full](http://www.frontiersin.org/articles/10.3389/fmars.2021.596797/full)) shows that proposed nutrient reduction measures may not significantly improve the European marine ecosystems. EEA's *Marine messages II* provides relevant solutions in line with the objectives of the MSFD and should be consulted.

The roadmap refers to links between the ocean and human health and wellbeing, which we wholeheartedly welcome. This is another step towards a holistic view with humans as part of the marine ecosystem. Both positive and negative ocean-human interactions should be considered, not just pollution. There is an opportunity to be more explicit about how these interactions can be managed for mutual benefit, potentially with additional ocean and human health indicators. Cost-benefit analyses should be conducted to make the case for new indicators, balancing additional monitoring costs against the benefits of protected ecosystem services and savings in public health and healthcare costs from achieving GES.

With the strong mandates for ocean observations in the MSFD, Member States have largely provided adequate resourcing to monitor and report on indicators. However more widely, the ocean observing mandate is often spread across ministries and national bodies, leading to inefficiencies and lack of national-level coordination. Member States are thus not taking advantage of other ocean observation efforts beyond MSFD monitoring. This lack of efficiency and clarity is further compounded by a lack of regional coordination of ocean observations.

The MSFD should be guided by scientific knowledge, with relevant new research periodically identified and where appropriate, integrated. For example, the impact on GES of multiple different stressors in combination is not well considered at present. In addition, the MSFD sets indicators for quantification of a given stressor, but does not require further biological monitoring to understand whether the intended impact has been achieved. It is important to also ensure that the intended aims of the MSFD are actually being achieved with the current indicators.

We also welcome the focus on increased digitalisation to modernize monitoring and reporting and to decrease their costs. This is in line with recommendations that emerged from our *Big Data in Marine Science* document and 7<sup>th</sup> Forum ([www.marineboard.eu/big-data-and-digitalization](http://www.marineboard.eu/big-data-and-digitalization)). The adoption of big data and artificial intelligence for MSFD monitoring and reporting will allow analyses to gain a more holistic overview of marine environmental status.

We support policy option 3 and 4 as outlined in the roadmap, namely strengthening implementation and enforcement, or targeted changes to the Directive. Repealing the MSFD would be a disastrous step backwards at a time where we should be increasing our protection of the Ocean and its biodiversity, and continuation of a policy that has already failed to meet its targets would mean GES will never be achieved. This is an ideal opportunity to build on and improve one of the most important marine environmental policies in Europe to make real positive changes, and we should make the most of it.

*The position of the EMB Secretariat does not necessarily reflect that of its members.*