

NWWAC Advice on the Marine Strategy Framework Directive - Call for Evidence - in the North Western Waters (NWW)

10 February 2026

Executive Summary

The NWWAC provides this advice to proactively contribute to the revision of the Marine Strategy Framework Directive (MSFD), ensuring that the perspectives of regional fisheries are integrated into the new legal framework. While acknowledging the Directive's role in establishing a framework for marine protection, the NWWAC highlights significant implementation gaps and governance concerns that must be addressed to balance environmental goals with socio-economic viability.

Key Governance and Strategy Concerns

- **Binding Threshold Values:** The AC strongly opposes turning qualitative descriptors into binding quantitative targets without formal impact assessments or inclusive stakeholder consultation.
- **Scientific Accuracy:** Current assessments often use fishing activity as a proxy for poor biological status, which may lead to biased results. The AC calls for science-based thresholds that acknowledge data uncertainty and the natural evolution of ecosystems.
- **Policy Coherence:** There is a critical need to streamline the MSFD with other EU frameworks, such as the Nature Restoration Law and Birds and Habitats Directives, to avoid redundant or conflicting measures.

Integration with the Common Fisheries Policy (CFP)

The NWWAC emphasises that the MSFD and CFP must be mutually reinforcing. Key recommendations include:

- **Hierarchy of Regulation:** The MSFD should align with CFP sustainability and food security goals. Fisheries management measures resulting from MSFD implementation should be designed primarily under the CFP framework.
- **Ecosystem-Based Management:** Both policies should continue moving toward a holistic approach, utilising the massive data-sharing infrastructure already established by the CFP.

Stakeholder Engagement and Regionalisation

- **Meaningful Involvement:** The AC calls for the formal recognition of fishers' experiential knowledge and the systematic involvement of ACs in impact assessments.
- **Regional Specificities:** Implementation must respect the distinct oceanographic and socio-economic characteristics of the NWW. For example, the centralised approach in Ireland differs significantly from the decentralised, basin-level strategy used in France.

Holistic Pressure Assessment and Funding

- **Proportionality:** The burden of achieving GES should not fall disproportionately on fisheries. A "source-to-sea" approach is needed to address land-based pollution and other maritime activities like offshore renewable energy.
- **Climate Change:** The AC suggests explicitly integrating climate change into the MSFD, possibly through a dedicated descriptor.
- **Adequate Funding:** Successful implementation requires sustainable financing from the EMFAF to cover monitoring, data collection, innovation, and gear adaptation.

Accessibility and Clarity

Finally, the NWWAC urges the Commission to simplify the MSFD's highly technical language. Fishers require short, practical guidance in their national languages that clearly outlines expectations, applicable measures, and implementation timelines.

Background

A revision of the Marine Strategy Framework Directive (MSFD) ([legal text](#)) was formally announced in the [Water Resilience Strategy](#) on 04 June 2025 and confirmed in the [Ocean Pact](#) on 05 June 2025. This announcement follows a long and structured review process of the MSFD, including a [public consultation](#) launched in 2021 and the publication of an [evaluation](#) in March 2025.

The evaluation concluded that the MSFD has been partially effective in meeting its objectives. It highlighted positive achievements, including the establishment of an EU-wide framework for marine biodiversity protection, improved cooperation between Member States, and the development of a stronger scientific knowledge base to support policy action. The evaluation states that the Directive has also contributed to concrete measures to limit specific pressures such as marine litter, underwater noise, and physical disturbance of the seabed. At the same time, the evaluation confirmed that the objective of achieving Good Environmental Status by 2020 has not been fully met. Biodiversity continues to decline in several areas, and pollution—particularly from nutrients and chemicals—remains a major concern, despite improvements in some areas such as coastal litter. The evaluation identified that the mixed results were linked not

only to external factors, but also to internal weaknesses, including regulatory and governance challenges, limited coherence with other EU legislation, insufficient regional coordination, and data gaps.

In its [call for evidence](#) published on 15 December 2025 the Commission outlines three preliminary areas of action as well as possible policy measures for revision. The latter identify both indicative “soft law” and “hard law” measures.

The objective of this North Western Waters Advisory Council (NWWAC) advice is to contribute proactively to the revision process by presenting practical, regional, and fisheries-based perspectives from the North Western Waters.

Targets and Stakeholder Engagement

a) Targets, descriptors and threshold values

The MSFD sets as its main objective the achievement — and maintenance — of a “Good Environmental Status (GES)” for European marine waters (qualitative target). To operationalise GES, the Directive defines 11 qualitative descriptors, which together describe how a healthy, clean, productive and sustainable marine environment should look like once GES is reached, including for example Descriptor 1 Biodiversity, Descriptor 3 Populations of all commercially exploited fish and shellfish, and Descriptor 6 Sea-floor integrity.

As the descriptors themselves are not quantitative, this has led to the introduction of thresholds values through a [Commission Decision](#). This approach raises important governance concerns for the NWWAC. While these criteria were initially intended to cover non-essential elements of the MSFD, thresholds increasingly operate in practice as binding quantitative targets.

Moreover, this process is conducted at an administrative level, without a formal impact assessment or a structured consultation of stakeholders. It is largely driven by DG ENV and national environmental administrations. The development of thresholds at purely technical levels further limits both political ownership and the meaningful involvement of stakeholders, including the fisheries sector. In this context, the NWWAC has already issued a formal statement to the Marine Strategy Coordination Group (MSCG), expressing clear concerns and opposition to this approach.

In addition, there is great variation between the nature of the descriptors and their corresponding threshold values including data availability. Current assessments are largely based on pressure modelling (particularly using VMS data), which is only available at a coarse geographic resolution and does not provide direct information on the actual biological status of habitats. In essence, fishing activity is used as a proxy for poor biological status without evaluating the impact of other identified pressures. The NWWAC queries the appropriateness as fishing activity does not necessarily equate to habitat damage. These approaches can lead to significant biases, overestimating or underestimating the impacts of fishing and artificially isolating one pressure among others.

For instance, the European Commission has proposed the use of reference areas (10%) without anthropogenic pressure. The NWWAC believes there are several limitations to this approach: the scarcity of areas truly free from human influence, the lack of representativeness of habitats, and the natural evolution of ecosystems over time. The AC highlights the persistent weakness of in situ knowledge on benthic habitats, with many habitats still classified as "unknown" in the MSFD reports of member countries.

There is an inherent risk of compensating for knowledge gaps with approaches based exclusively on pressure from thresholds defined by MSFD descriptors. Such a strategy could lead to poorly calibrated decisions, shifts in effort and, ultimately, an artificial increase in the areas considered degraded, without any real ecological benefit.

The NWWAC would like to express its concern regarding the possibility of incorporating the concept of GES threshold values into a revised Directive and integrating current adopted threshold values into the revised legal framework as binding targets. In addition, the MSFD is a framework directive meaning it is up to Member States to develop and implement the appropriate measures. Introducing binding targets at this stage could create considerable legal uncertainty and potential conflicts.

NWWAC recommendations

1. The NWWAC reiterates the concerns over the current practice of setting threshold values and contesting the fact that they should be introduced as such in a revised MSFD.
2. Thresholds values should be science-based, regularly reviewed, and adaptable to evolving knowledge.
3. Uncertainty must be acknowledged, especially where data gaps remain.
4. A socio-economic impact assessment must be conducted prior to setting thresholds.
5. MSFD targets must be realistic and adapted to regional sea basin specificities.
6. Targets should reflect environmental, ecological objectives and socio-economic realities on an equal footing.
7. Targets must not be made binding without scientific consensus and full and inclusive stakeholder consultation.

b) Stakeholder Engagement

Stakeholder engagement remains an outstanding issue in the implementation of MSFD both at EU level but also at national level. The NWWAC would like to reiterate that the inclusion of fisheries stakeholders in the management of marine resources is paramount as both the commercial and recreational fishing sectors play an important role in achieving the objectives of

the deliverable (GES) for several descriptors.¹ The AC emphasises that successful MSFD implementation requires a deeply integrated, regionalised approach that involves local authorities and stakeholders from the earliest planning stages to account for specific local constraints and shared responsibilities. Achieving GES necessitates breaking down administrative silos between maritime and environmental departments to foster holistic marine spatial planning, while also strengthening cross-regional cooperation for the establishment of protected areas. Because fisheries management is inextricably linked to ocean governance and climate change, it is essential to involve both the commercial and recreational fishing sectors in environmental policy through robust industry-science collaborations and by recognising the overarching role of Advisory Councils in mediating between nature conservation and resource utilisation.

In this context, the AC would like to draw attention to Commission Staff Working Document “on the establishment of conservation measures under the Common Fisheries Policy for Natura 2000 sites and for Marine Strategy Framework Directive purposes” ([SWD\(2018\) 288 final](#)) which outlines good practices “when preparing joint recommendations for the adoption of conservation measures under the Common Fisheries Policy (CFP) to comply with their obligations pertaining to Article 6 of the Habitats Directive, Article 4 of the Birds Directive, and Article 13(4) of the Marine Strategy Framework Directive (MSFD).” Practices put forward in this guidance document could form the basis for a code of practice regarding effective and efficient stakeholder engagement in the future.

NWWAC recommendations:

8. Early, continuous, and meaningful stakeholder involvement must be guaranteed. To this end, best practices of stakeholders’ engagement in MSFD should be compiled as an attempt to level the playing field amongst the Member States.
9. Advisory Councils, including NWWAC, should be systematically involved in the impact assessment for applying threshold values that impact fishing activities.
10. Fishers’ experiential knowledge should be formally recognised as a source of information.

Coherence with the EU Legislative Framework

Policy coherence remains a major challenge, with overlapping objectives, legislation, and measures creating complexity and uncertainty for stakeholders. The revision of the MSFD must be guided by a clear objective of simplification and reduction of administrative burden, ensuring that environmental ambition is delivered through streamlined, consistent, and efficient governance tools, rather than through the accumulation of fragmented requirements.

¹ NSAC/NWWAC Advice on the MSFD Review, March 2022 ([link](#))

Synergies with other legislation (see below) must be clear with a remaining degree of flexibility to account for upcoming processes such as the CFP evaluation.

a) Link with Nature Directives and Nature Restoration

The MSFD aims to achieve good environmental status (GES) in marine waters through 11 descriptors, including descriptor 6 on the integrity of the seabed (benthic habitats) and descriptor 3 on the status of fishery resources. At the same time, the Nature Restoration Regulation introduces legally binding targets for the restoration of marine ecosystems. The NWWAC stresses the need for consistent coordination between these two frameworks in order to avoid redundant, inconsistent or disproportionate measures and to ensure effective reconciliation between habitat protection and sustainable fishing activities.

Spatial protection measures, including Marine Protected Areas (MPA), Special Areas of Conservation (SACs) and Special Protection Areas (SPAs) are noted in the MSFD as measures to be taken in order to achieve or maintain good environmental status. However, at Member State level these measures are implemented under different processes and often administered by different government departments. There are already clear examples of incoherent implementation within Member States on the identification and designation of such sites as highlighted by the NWWAC.

The revision of the MSFD should ensure full coherence with the Birds and Habitats Directives, avoiding overlapping objectives, duplicated assessments, and parallel conservation measures. While the Nature Directives are primarily site- and species-based, the MSFD provides a broader, ecosystem-based framework; their respective roles should be clearly articulated to ensure complementarity rather than regulatory fragmentation.

NWWAC recommendations:

11. MSFD must be consistent with the Birds and Habitats Directives and ensure consistency between Good Environmental Status under the MSFD and favourable conservation status under the Nature Directives.
12. Duplication of conservation objectives and overlapping measures must be avoided especially in the Natura 2000 sites.
13. Synergies with the Nature Restoration Law must be ensured and restoration targets must consider existing fishing activities and historical use of marine space.
14. Streamlined planning, monitoring, and reporting across frameworks should be promoted to reduce administrative burden.

b) Link with the CFP (Including a possible reform)

The link between the Common Fisheries Policy (CFP) and the MSFD is a fundamental pillar of EU maritime law. While they are separate policies with different legal basis, they are designed to be mutually reinforcing to ensure that fishing is both environmentally sustainable and socio-economically viable.

While the CFP provides the regulatory tools for managing fisheries, the MSFD serves as the environmental pillar of the EU's Integrated Maritime Policy. The CFP Regulation explicitly states that fisheries management must be consistent with the MSFD's objective of achieving Good Environmental Status (GES).

The strongest technical link is found in MSFD Descriptor 3, which focuses on "Commercially exploited fish and shellfish." Under the MSFD, Descriptor 3 requires fish populations to be within safe biological limits. The CFP achieves this by aiming for Maximum Sustainable Yield (MSY). Both policies use similar indicators to measure success, specifically Fishing Mortality (F) and Spawning Stock Biomass (SSB).

The two policies share a massive data-sharing infrastructure. Scientific data collected under the CFP (landings, by-catch, and stock age/size) is the primary source of information used to assess the health of the marine environment for the MSFD. Without the constant monitoring required by the CFP, the MSFD would lack the evidence needed to determine if the marine environment is healthy.

Both policies have moved away from looking only at single fish species toward a holistic Ecosystem-Based Approach. The CFP's landing obligation and technical measures to reduce by-catch directly support MSFD Descriptor 1 (Biodiversity) and Descriptor 4 (Food Webs). Restrictions on certain types of bottom-trawling gear under the CFP are the primary tools used to meet MSFD Descriptor 6 (Seafloor Integrity).

NWWAC recommendations:

15. It is important to remain mindful that the MSFD will be revised before the CFP, therefore it is vital to ensure that the CFP is not merely treated as a sectoral tool of the MSFD, but rather that the relationship works the other way around.
16. MSFD objectives must be fully aligned with CFP sustainability (environment, social and economic) and food security goals.
17. Fisheries management measures emanating from MSFD implementation should be designed primarily under the CFP framework.
18. Environmental measures directly affecting fisheries should follow CFP governance principles including regionalisation principle therefore be based on joint recommendations.

c) Link with the Maritime Spatial Planning Directive (MSPD)

It is envisaged that the Ocean Act will effectively bring MSFD and MSPD under a common framework. In several Member States, synergies between the MSPD and MSFD already appear to be in place, in some cases fully integrated and in others reflected within the same strategic or planning documents. Establishing clearer links between the MSPD and the MSFD could enhance overall coherence, particularly at the level of Member State implementation. However, any common framework for these two Directives should be limited to areas where synergies deliver clear added value and should not result in additional administrative burden for Member States. The Impact Assessment should therefore examine whether a common framework at EU level is preferable to a coordinated implementation framework at Member State level.

NWWAC members would welcome a stronger role for DG MARE in the implementation of the MSFD in order to establish a more balanced approach between resource use and environmental protection. It is important that both MSFD and MSPD remain on an equal footing and remain underneath the CFP in the legal hierarchy.

NWWAC recommendations:

19. Support a limited and pragmatic common framework linking MSFD and MSPD where it adds clear value and avoids additional administrative burden.
20. Use the Impact Assessment to determine whether an EU-level framework is preferable to coordinated implementation by Member States.
21. Strengthen the role of DG MARE in MSFD implementation to better balance resource use and environmental conservation.
22. Ensure MSFD and MSPD remain on an equal footing under the CFP in the EU legal hierarchy

Coordination between DG MARE and DG ENV and involvement of both Fisheries and Environment Administrations

At the moment, MSFD implementation is mainly driven by DG ENV and Environment Administrations at the Member States level. In the reply to the 2022 NSAC/NWWAC advice, the Commission agreed “that there is a need to break the silos between maritime (including fisheries) and environmental departments and improve the cooperation between the different fisheries administrations and stakeholder groups.”² Several years on, this division does not seem to have diminished, and positioning of resource utilisation and environmental conservation has become increasingly polarised. The absence of DG MARE from a co-chairing role in relevant discussions, particularly on fisheries-related matters, raises questions about institutional balance and

² ([link](#))

coordination. AC members believe both environmental and fisheries administrations, as well as DG ENV and DG MARE, should be jointly present and consulted in these discussions.

NWWAC recommendations:

23. Stronger institutional coordination is needed between DG MARE and DG ENV to ensure policy coherence. To this end, MSFD implementation should be supervised by both DG MARE and DG ENV and should involve both fisheries and environmental Member States administrations.
24. MSFD implementation must be aligned with CFP objectives, particularly on sustainability (environment, social and economic) and food security objectives.

Proportionality of Maritime Activities, Source-to-Sea Approach and Integration of climate change

Beyond the fisheries sector, a wide array of human endeavours significantly influences the attainment of GES, both for better and for worse. Under the Directive's updated Annex III, the marine environment is impacted by 31 specific activities categorised into ten overarching themes. These encompass physical modifications like land reclamation and offshore construction, the extraction of resources ranging from minerals and fossil fuels to living organisms, and various forms of energy production. Additionally, sectors such as aquaculture, maritime transport, industrial development, tourism, national defence, and scientific research play pivotal roles. The interactions between these diverse sectors often create complex, unpredictable pressures that can affect the fishing industry's ability to reach Maximum Sustainable Yield (MSY) and other descriptors of MSFD in ways which are often difficult to predict. For example, eutrophication (D5) may have initial positive effects on fish stock biomass in some cases but can also cause changes in primary productivity and disturbances in food web dynamics and biodiversity (D4, D1). Contaminants may directly affect commercial species through oil spills and fish kills, or indirectly through for example mercury contamination caused by coal burning, mining and industrial processes. While impacts from some descriptors such as marine litter (D10) and energy and noise (D11) on commercial fisheries species may occur, these are not yet fully described or understood.

Currently, the assessment of marine disturbance remains narrow because ICES only quantifies the impact of bottom trawling, leaving other significant pressures unmeasured and lacking established thresholds for acceptable habitat disruption. This one-sided focus fails to account for how the success of various competing industries is often driven by shifting political priorities, highlighting a critical need to better investigate how these sectors can coexist. For instance, the aggressive expansion of offshore Marine Renewable Energy is intensifying the struggle for space, especially in coastal waters, and its lifecycle—from construction to operation—affects nearly every environmental descriptor (D1, D2, D3, D4, D6, D7, D8, D9, D10, D11). Consequently, any

change in approach must evolve into a more holistic, multi-sectoral, and multispecies approach to effectively manage these overlapping demands.

In this context, the limited integration of climate change within the MSFD framework represents a significant gap. Climate change is a major and cross-cutting driver of change in the marine environment, affecting ocean temperature, acidification, deoxygenation, species distribution, productivity, and ecosystem resilience. These impacts interact with, and often exacerbate, existing pressures covered by current descriptors, influencing both environmental status and the sustainability of marine resource use. Consideration should therefore be given to more explicitly integrating climate change into MSFD implementation, including the potential development of a dedicated descriptor or equivalent mechanism to ensure its effects are systematically assessed and addressed.

It is vital to avoid disproportionate pressure being placed on specific marine users due to MSFD-related measures, particularly in cases where, for example, land-based pollution is actually the main driver of certain deteriorations in the marine environment.

NWWAC recommendations:

25. Measures should be proportionate to the environmental pressures generated by different maritime activities.
26. The burden of action should not fall disproportionately on fisheries.
27. Fisheries must be treated as part of the solution, not only as a pressure.
28. Climate change should be fully integrated into the MSFD framework, possibly with a descriptor.
29. Additional analyses need to be carried out to assess non-fishery disturbances in an appropriate and proportionate approach.
30. The source-to-sea approach as foreseen in the Water Resilience Strategy must be fully applied, addressing:
 - Land-based pollution
 - River basin management
 - Urban, industrial, and agricultural sources

[MSFD Implementation in the North Western Waters \(NWW\)](#)

The NWWAC believes that mechanisms for regional cooperation in MSFD are not clearly established. A primary obstacle to achieving GES is the lack of a harmonised, quantitative definition at the regional level, as evidenced by the fact that only 8% of initial Member State definitions were deemed adequate due to a lack of measurable details and cross-border coherence. This inconsistency is often exacerbated by the differing legal interpretations of regulations versus directives and a frequent failure by Member States to align environmental

targets with specific monitoring programmes and threshold values. To rectify these deficiencies and establish a more unified methodological approach, MS should set up an adequate governance system at regional and national levels by assigning clear responsibilities to competent authorities.

For example, while both Ireland and France implement the MSFD within the same regional framework (OSPAR), they differ significantly in their geographic scope, governance structures, and specific environmental challenges. Ireland manages a single, massive marine region (the North-East Atlantic) that is roughly ten times its landmass. Because its waters are predominantly deep-ocean and offshore, its implementation focuses heavily on large-scale habitat mapping and deep-sea biodiversity. France must implement the MSFD across four distinct sub-regions: the English Channel/North Sea, the Celtic Seas, the Bay of Biscay, and the Mediterranean. This requires France to maintain multiple, localised marine strategies that coordinate with different sets of neighbours (e.g., working with Spain in the south and Belgium/the UK in the north).

In Ireland, implementation is centralised under the Department of Housing, Local Government and Heritage, supported by scientific agencies like the Marine Institute. Ireland's strategy is often integrated with its National Marine Planning Framework to manage the rapid expansion of offshore wind. However, there seems to be a lack of coordination with other marine resource uses as well as integration into Marine Spatial Planning overall. Communication with stakeholders must be improved.

France uses a highly structured, basin-level approach. Each of its four maritime zones is managed by a Maritime Prefect and a Regional Prefect who co-pilot the strategy. This results in a more decentralised system where local socioeconomic factors heavily influence the specific "Programmes of Measures." However, the socio-economic component is based on a primarily bottom-up approach, with local and professional stakeholders invited to formulate proposals. Conversely, the environmental component is part of a top-down approach, led by the Water and Biodiversity Directorate (DEB), with scientific and technical support from the OFB, as part of the implementation of the MSFD. While this differentiation may be justified by the nature of the environmental issues, which require a strong scientific basis, professional organisations nevertheless regret the lack of methodological and scientific support for the development of the socio-economic component (human and social sciences, economics, geography, anthropology). This results in an imbalance between the two components, to the detriment of a fully integrated vision of maritime uses.

Furthermore, while the Directive mandates that GES is achieved on a regional basis, the role of the Regional Seas Conventions (RSCs) within the Directive is not clear, which has led to "institutional ambiguity"³ and a communication vacuum. Some regional activities relevant to the

³ Van Leeuwen, J. van Hoof, L. and van Tatenhove, J. 2012. Institutional ambiguity in implementing the European Union Marine Strategy Framework Directive. *Marine Policy* 36, 636-643. | Van Tatenhove, J.P.M. 2013. Turning the tide: developing legitimate marine governance arrangements at the level of the regional seas. *Ocean and Coastal Management* 71 296-304

MSFD occur within RSCs (i.e., OSPAR) however this work does not constitute implementation of the Directive. The Commission should promote the use of RSCs and organisations and MS' strategies as means to reach higher regional coordination. At the same time RSCs should strengthen their cooperation in the form of cross-regional cooperation, where relevant and appropriate. Advisory Councils as de facto stakeholder representations should interact with and feed into RSC work.

In addition, the NWWAC emphasises that reaching these ambitious environmental goals is impossible without prioritised coordination and collaboration with the UK, given the shared maritime remit areas in the North Western Waters.

NWWAC recommendations:

31. The NWW have distinct oceanographic, ecological, and socio-economic characteristics. Implementation should respect regional specificities and mixed fisheries realities.
32. Maritime planning must give sufficient consideration of the economic and social realities of maritime sectors, particularly fishing and cannot be guided by environmental objectives alone.

Modernisation and Innovation

MSFD implementation must clearly reflect that conservation and competitiveness are not contradictory objectives, but mutually reinforcing ones. The conservation of marine ecosystems should be an opportunity for the EU fleet to modernise and to embrace innovation. Through modernisation and innovation, MSFD implementation can strengthen the long-term viability of the sector, enhance its environmental performance, and enable EU fishers to continue providing healthy, sustainable food to EU citizens.

NWWAC recommendations:

33. MSFD implementation should act as a driver for innovation and modernisation following the Clean Industrial Deal and the Competitiveness Compass.

Funding

The successful implementation of the MSFD is currently hindered by organisational deficits, including insufficient staffing levels and sub-optimal communication between national departments, which limits the capacity of Marine Directors to manage this ambitious legislation. To resolve these challenges, the NWWAC advocates for increased resources and capacity building, suggesting that sustainable financing could be drawn from existing funds like the EMFAF to support both improved implementation and targeted research programmes. Furthermore,

investing in the digitalisation of reporting tools is a critical step toward enhancing data comparability across borders and streamlining monitoring processes, which would ultimately mitigate reporting delays and avoid costly infringement procedures. By fostering better regional cooperation, Member States could more efficiently share these monitoring costs while simultaneously promoting social sustainability through new employment opportunities in the digital and maritime sectors.

NWWAC recommendations:

34. MSFD implementation must be supported by adequate funding that should cover monitoring and data collection, transition costs for fleets as well as innovation and gear adaptation
35. EMFAF and future MFF available fundings need to be proportionate to the efforts asked to the fisheries sector to apply the revised directive.

Readability and Accessibility for Fishers

The MSFD is widely regarded as one of the most ambitious pieces of environmental legislation, but it is also one of the most difficult for a layperson to navigate. Its design prioritises scientific rigor and legal completeness over clear, accessible communication. The most immediate barrier to accessibility is the highly technical language used throughout the Directive.

The central goal is achieving "Good Environmental Status" (GES). For a layperson, "good" is subjective, but in the MSFD, it is defined by 11 complex descriptors and dozens of criteria that require a background in marine biology to fully grasp. Documents are often saturated with terms like *MSY* (Maximum Sustainable Yield), *SSB* (Spawning Stock Biomass), *PoMs* (Programmes of Measures), and *RSCs* (Regional Sea Conventions), which can make official reports feel impenetrable.

The MSFD operates in a repeating cycle of assessment, monitoring, and action. For a citizen trying to understand if their local sea is "healthy," the timeline can be confusing. Reports are often published years after the data was collected. Results are frequently labelled as "Unknown" or "Partially Achieved" due to data gaps, which can be frustrating for the public who want a simple "Pass/Fail" for the environment.



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NWWAC recommendations:

36. MSFD objectives, measures, and obligations must be presented in clear, simple language.
37. Guidance documents should be:
 - Short and practical
 - Available in national languages
 - Supported by concrete examples
38. Fishers need clarity on:
 - What is expected from them
 - Which measures apply to which fisheries
 - Timelines for implementation

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