



The Irish Wildlife Trust welcomes the opportunity to submit to this Call for Evidence on the Marine Strategy Framework Directive (MSFD). The MSFD is the EU's 'main regulatory instrument for marine environmental protection' and revisions should be an opportunity to ensure this Directive is strengthened and that Member States are supported in working coherently to achieve its objectives.

Legally binding measures and thresholds at EU level should be introduced. Unfortunately, allowing Member States to define measures and ambition nationally has failed to achieve good environmental status (GES) across EU seas and resulted in uneven application of the Directive across the EU. Any legally binding EU targets and measures should not be lower in ambition than current national targets and the current agreed thresholds. Measures and thresholds must be strong enough to ensure GES is reached and the ecosystem based approach enforced. There must also be adequate funding to ensure the implementation and enforcement of mandated measures as well as effective monitoring.

A coherent EU approach is vital due to the connectivity of EU sea basins and a greater focus on land sea interactions should be included. Stronger integration with the Nitrates Directive and Water Framework Directive are vitally needed as pollution and land run off are impacting the environmental status of EU waters and undermining protective measures being taken at sea. Alignment of the MSFD with other environmental laws such as the Birds and Habitats Directive, Nature Restoration Regulation is also required to ensure effectiveness.

With the MSFD, Annex VI should be strengthened to include legally binding, outcome orientated measures, specifically tailored to reach GES for each Descriptor. There should also be the addition of a criteria around the bycatch of sensitive marine species including protected, endangered and critically endangered species. Current regulations on this do not provide legally robust actions to reduce bycatch of non-target species and this is an issue across EU Member States including Ireland. Including this in the MSFD will align with the Technical Measures Regulation and ensure Member States have effective measures in place to protect sensitive species from fishing activity.



The topic of 'simplification' of environmental laws at EU level is a worrying development and we stress the need to ensure this does not result in deregulation. While simplification of reporting requirements will allow resources to be freed up for the actual implementation of the Directive, there should be no simplification or weakening of the environmental targets included within the Directive. Existing shortcomings and weaknesses in implementation must be addressed, rather than reducing the environmental goals. Simplification should be focused on issues around data sharing, regional cooperation and streamlining monitoring systems. There should be clear guidance provided by the Commission for Member States who are failing to reach GES in many descriptors. This should be followed with increased monitoring, enforcement and accountability and will help to address the triple planetary crisis we are facing.

Putting the MSFD at the core of the EU Ocean Act should ensure that there is the political will to reach GES for each descriptor. There should be greater alignment with the Marine Spatial Planning Directive to ensure environmental considerations are at the heart of all planning decisions.

