Call for Evidence - The European Oceans Pact

Feedback by the International Fund for Animal Welfare (IFAW)

The European Oceans Pact should set a holistic, coherent and consistent approach to ocean-related policies with the overarching goal of achieving a healthy and resilient ocean by 2030. The International Fund for Animal Welfare (IFAW) presents a list of the key challenges facing the EU's ocean governance and priority measures for addressing these challenges that should be integrated into the Oceans Pact.

We highlight the following issues that require urgent action:

1. Underwater Radiated Noise (URN): The impact of sound energy emitted by ships into the ocean, which affects marine life and their ability to communicate, navigate, and reproduce.

2. Ship Strikes: Collisions between vessels and marine animals, which can cause significant harm and even fatalities.

3. Bycatch: The unintended catching of non-target species in fishing gear, leading to unnecessary mortality and ecosystem disruption.

4. International Cooperation: Insufficient collaboration and coordination among global authorities to address marine environmental issues effectively.

5. The health of the ocean and the EU's competitiveness: When assessing competitiveness, the need to invest in the sustainable use of European seas should not be overlooked.

Solving these issues will help the EU to pursue a healthy and productive ocean and champion the EU's international ocean governance agenda, which is amongst the goals of the European Oceans Pact.

Challenges

Underwater Radiated Noise (URN)

In European waters, shipping is the primary source of underwater radiated noise, and the impacts of this pervasive pollutant are widespread. Underwater noise can change predator-prey interactions and community structure, compromise food web dynamics and stability, and risk ecosystem productivity and services.

Both the number of ships and the speeds at which they can travel are increasing dramatically in our waters[1] contributing to global warming and to the intensification of underwater noise pollution. Globally, **half of all underwater radiated noise is produced by the commercial shipping sector[2], which negatively impacts marine life and habitats**.

Scientific studies undeniably show that underwater noise from human activity is detrimental to marine species both temporarily and in the long-term, as it introduces unprecedented risks for key marine species, biodiversity, ecosystems, and overall ocean health. Continuous, human-generated noise drowns out the natural sounds of the ocean, and noise-sensitive marine life such as marine mammals are negatively affected. These animals rely on sound for their survival – they use it to communicate with one another, navigate, find mates and prey, and to avoid predators.

In European waters, the IUCN Red List of Threatened Species lists several subpopulations of whale and dolphin species as either "Endangered" or "Critically Endangered", especially located in the Mediterranean Sea, stressing the urgency to act. Other cetaceans such as the harbour porpoise in the Baltic Proper are also under threat, with a population of a few hundred individuals left[3]. In fact, both the harbour porpoise and the common bottlenose dolphin are included in Annex II of the EU

[1] Collisions between ships and whales, 2016, David W. Laist, Amy R. Knowlton, James G. Mead, Anne S. Collet, Michela Podesta

[2] Hildebrand, J.A. (2009). Anthropogenic and natural sources of ambient noise in the ocean. Marine Ecology Progress Series, 395(5).

[3] Report on the implementation of the Marine Strategy Framework Directive (Directive 2008/56/EC), COM(2020) 259 final; page 16.

Habitats Directive - which requires the designation of special areas of conservation - while all cetacean species are included in Annex IV of the same legislation.

The Marine Strategy Framework Directive (MSFD)[4], adopted in 2008, can be regarded as *the* integrated EU maritime policy environmental pillar and has introduced an integrated approach to the entire marine ecosystem throughout EU waters. The MSFD provides a framework for monitoring, assessing, and implementing measures to protect marine life and reduce pollution. Originally, it required Member States to set environmental targets, along with national programmes of measures, in order to achieve 'good environmental status' (GES) in their marine waters by 2020, within which underwater noise is recognised as a source of pollution (article 3.8). GES characteristics had to be determined based on 11 Descriptors.

There are many kinds of anthropogenic energy that human activities introduce into the marine environment, including sound, light, other electromagnetic fields, heat, and radioactive energy. Among these, the most widespread and pervasive kind of anthropogenic energy is underwater sound.[5]

'Underwater noise and other forms of energy' is Descriptor 11 (D11) of the MSFD and contains two Criteria of Good Environmental Status (GES) in European waters: D11C1 on “Anthropogenic impulsive sound in water” and D11C2 on “Anthropogenic continuous low-frequency sound in water”. D11C2, which is relevant for shipping, is defined as “The spatial distribution, temporal extent, and levels of anthropogenic continuous low-frequency sound do not exceed levels that adversely affect populations of marine animals.”

The European Commission’s recently published assessment of Member States’ progress under the MSFD highlights that despite improvements in some areas, GES

[4] https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32008L0056

[5] Van der Graaf AJ, Ainslie MA, André M, Brensing K, Dalen J, Dekeling RPA, Robinson S, Tasker ML, Thomsen F, Werner S (2012). European Marine Strategy Framework Directive - Good Environmental Status (MSFD GES): Report of the Technical Subgroup on Underwater noise and other forms of energy.

had not been achieved in European marine waters[6]. Overfishing, discharges of nutrients, contaminants and litter, intense maritime traffic and several other forms of anthropogenic pressure, combined with the growing impacts of climate change, have severely degraded the condition of our marine ecosystems. In relation to D11, the MSFD considers that GES is achieved when energy, including underwater noise, is at levels that do not adversely affect the marine environment. GES for EU waters should have been achieved by 2020, but D11 was not accomplished since thresholds were not set. However, thresholds have now been set meaning Member States are obliged to act now[7].

On 11 March 2024, the Commission presented a Notice on the threshold values set under the Marine Strategy Framework Directive 2008/56/EC and Commission Decision (EU) 2017/848[8]. In this Notice, the Commission established threshold values on continuous noise and, therefore, set binding limits for underwater noise pollution from shipping without however providing clear guidance to Member States on how to respect them.

There is currently no regulation (in the EU or elsewhere) on URN from shipping nor mandatory measures to prevent adverse effects on marine wildlife. This issue is not sufficiently tackled, yet it is connected to the MSFD, EU Nature Directives, Green Deal, Smart and Sustainable Mobility Strategy, Zero Pollution Action Plan, the new EU rules aiming to decarbonise the maritime sector and the revised Environmental Crime Directive. The MSFD revision under the Ocean Pacts should offer the opportunity to improve implementation and enforcement through the introduction of legally binding measures to reach the GES in EU waters. This would also simplify the MSFD implementation by providing concrete and clear guidance to Member States.

[6] eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=COM:2025:3:FIN
[7] Circabc (europa.eu)
[8] EUR-Lex - 52024XC02078 - EN - EUR-Lex (europa.eu)

At the global level, underwater noise has been recognised as a source of pollution under the United Nations Convention on the Law of the Sea (UNCLOS)[9], and the International Maritime Organization (IMO) has recently adopted new guidelines on reducing underwater noise from shipping to further address adverse impacts on marine wildlife.[10] Since those guidelines do not currently include mandatory measures, uptake and the level of implementation will likely be uncertain. There is **currently no regulation by IMO of underwater noise from global shipping to prevent adverse effects on marine wildlife** and to date, this topic has received less attention compared to other sustainability concerns within the shipping industry, such as greenhouse gas emissions.

Ship strikes

Cetaceans, especially large whales, in European waters are threatened by collisions with vessels, known as ship strikes, which usually result in death or severe injuries. In addition to URN, ship strikes pose a major conservation concern for protected, threatened, and endangered species and, with them, the whole marine ecosystem.

Anywhere that ships and whales coincide, there is the risk of ship strike. Shipping routes throughout EU waters intersect with critical whale habitat and in many cases, threaten the survival of endangered sub-populations where collisions with ships are the leading cause of death.

Unfortunately, whales are difficult to detect. A mid-sized container vessel of the Panamax class is about 320m long. In comparison, the largest whale is the blue whale at about 33m length and most of its body at any given time is underneath the water's surface. Even if whales are sighted, large ships are unable to make sudden and safe manoeuvres to avoid a collision.

[9] United Nations Convention of the Law of the Sea, art. 1.4 : "pollution of the marine environment means the introduction by man, directly or indirectly, of substances or energy into the marine environment"
[10] Revised guidelines for the reduction of underwater radiated noise from shipping to address adverse impacts on marine life (imo.org)

The International Whaling Commission (IWC) identifies a number of High Risk areas for whales in EU waters in its *Strategic Plan to Mitigate the Impacts of Ship Strikes on Cetacean Populations: 2022-2032*[11]. These include the Canary Islands (sperm whales), the Hellenic Trench in Greece (sperm whales), and several areas in the Mediterranean Sea for both fin whales and sperm whales. The importance of minimising risk is highlighted for these areas as the populations/sub-populations are either vulnerable, or ship strikes could adversely impede population growth.

The development of appropriate mitigation strategies to reduce strike risk in these areas is urgently required and implementation of concrete measures to reduce or eliminate risk by Member States has been lacking to date. In addition to these identified areas, whale populations and their habitats overlap with high densities of shipping traffic throughout EU waters and so there are likely additional high risk areas that have not yet been identified.

Quantifying the extent of ship strikes is a global challenge. Dead whales often sink to the seabed or are carried away by currents. Only a small proportion wash up on a beach or are carried into port if draped across the bulbous bow. Many mariners do not know about reporting requirements for ship strikes, and in many cases, ship strikes may go unnoticed.

However, the Habitats Directive requires Member States to take preventive measures to strictly protect the animal species listed in Annex IV in their natural range. Member States should prohibit (a) all forms of deliberate killing of specimens of these species in the wild; (b) disturbance of these species, particularly during the period of breeding, rearing, and migration. In the case of lack of data on the conservation status and/or the actual level of incidental capture and killing, the precautionary principle should apply. Member States are requested to consider a wide range of preventive measures, including reducing the speed of vessels or

[11] IWC Strategic Plan to Mitigate the Impacts of Ship Strikes on Cetacean Populations: 2022-2032 https://archive.iwc.int/pages/view.php?ref=19858&k=

rerouting the traffic, to avoid ship strikes. Urgent action is needed and a lack of knowledge cannot be a reason for inaction.

Bycatch

All species of cetacean are strictly protected under European law[12] and through International Agreements[13]. Despite this, cetacean bycatch has been a major conservation and welfare concern throughout European waters for decades. EU Member States have largely failed to implement concrete conservation measures to protect them from bycatch.

In response to this lack of action, the EC has initiated infringement procedures against several EU Member States in specific cases of failure to address bycatch. If no satisfactory conclusion is found, the matter could be referred to the Court of Justice, which can impose financial sanctions. However, infringement cases drag for years, with limited and delayed outcomes.

Upon the request of the EC, the International Council for the Exploration of the Sea (ICES) produced specific advice on emergency measures to prevent bycatch of common dolphin and Baltic harbour porpoise in the North-East Atlantic [14]. In both cases, ICES advised a combination of spatial temporal fishing closures and the use of pingers on certain types of fishing gear.

Widespread changes are needed to ensure that Member States can reach the target of the EU Biodiversity Strategy for 2030 to "eliminate or reduce bycatch of sensitive

[12] Habitats Directive (Council Directive 92/43/EEC) & Marine Strategy Framework Directive (MSFD) (Directive - 2008/56 - EN - EUR-Lex (europa.eu).

[13] Agreement on the Small Cetaceans of the Baltic, North-East Atlantic, Irish and North Seas (ASCOBANS) and the Agreement on the Conservation of Cetaceans in the Black Sea, Mediterranean Sea and contiguous Atlantic area (ACCOBAMS)

[14] ICES. 2020. EU request on emergency measures to prevent bycatch of common dolphin (Delphinus delphis) and Baltic Proper harbour porpoise (Phocoena phocoena) in the Northeast Atlantic. In Report of the ICES Advisory Committee, 2020. ICES Advice 2020, eu.2, EU request on emergency measures to prevent bycatch of common dolphin (Delphinus delphis) and Baltic Proper harbour porpoise (Phocoena phocoena) in the Northeast Atlantic (figshare.com)

species and to step up bycatch monitoring", as well as to fully and coherently implement EU environmental and fisheries legislation and the Action Plan to conserve fisheries resources and protect marine ecosystems as required by the EU climate adaptation strategy.

International cooperation

Given the High Seas cover two-thirds of the ocean, stronger policy alignment and cohesion across sectors and relevant EU agencies and Frameworks are essential to accelerate the Biodiversity Beyond National Jurisdiction (BBNJ) treaty's implementation, as a key and legally binding tool for meeting global commitments, such as establishing a global network of large-scale fully and highly protected High Seas MPAs.

Effective implementation requires coordinated efforts by the EU and its Member States to balance competing interests and ensure policy coherence. A unified ocean policy framework with BBNJ at its core is crucial, including a systematic review of how existing and new policies align with the Agreement's objectives.

The health of the ocean and the EU's competitiveness

European seas are at a tipping point since climate change is hitting the ocean hard and fast. Sudden and steep rises in ocean temperature observed in recent years are accelerating deoxygenation and acidification, which in turn devastate marine biodiversity. We need to reverse the decline of ocean health to protect marine life, public health, and people's livelihoods.[15] That is more urgent than ever, given that Member States missed 2020 targets to achieve GES for Europe's seas.

The European Commission has released its much-anticipated Competitiveness Compass[16], to "drive prosperity and competitiveness to Europe". While this initiative

[15] Blue Manifesto - Seas At Risk
[16] EU Compass to regain competitiveness

sets out to address Europe's economic resilience, it overlooks a critical dimension: the health of the ocean and its ecosystems, which are vital to a sustainable and competitive future.[17]

Suggested measures needed to protect marine biodiversity

URN and Blue Speeds

An EU Guidance should be developed to provide Member States with practical advice and tools on how to integrate the threshold values developed under the MSFD into their GES determination and Marine Strategies. Member States may need advice and methodologies on the technical aspects of implementation, as indicated below. It is important to stress that - although more research will certainly be beneficial to the reduction of underwater noise - there is enough scientific knowledge to act now and start to implement measures and pilot projects to reduce underwater noise in accordance with the precautionary principle (art. 191.2 TFEU) and numerous obligations by Member States in line also with requirements adopted in international and/or regional fora and by EU law.

As highlighted by the recent European Commission's assessment of the MSFD and a new report published by the European Maritime Safety Agency (EMSA) and the European Environment Agency (EEA)[18], urgent action is needed to address underwater noise pollution and mitigation measures could reduce it by up to 70% between 2030 and 2050.

The EU Guidance should also provide recommendations to improve and facilitate the collaboration of Member States and the Commission with stakeholders such as shipping companies, nautical sector, fishermen, port authorities, energy sector, researchers and NGOs, for example via a dedicated platform, on the development and implementation of best practices and knowledge. Collaboration with all

[17] The ocean must not be the loser in the EU's competitiveness race - Seas At Risk
[18] https://www.emsa.europa.eu/emter-2025/full-report.html

stakeholders will enhance transparency and acceptance of measures and ensure that best available knowledge is used as a basis for the implementation of noise reduction measures.

For instance, port authorities may need advice on how to optimise traffic management and port calls to avoid ships queuing in port waters and on the establishment of incentives and logistics to support slower speeds at sea.

Such a dedicated platform may also be beneficial for regulatory bodies, when it comes to marine spatial planning and/or assessment procedures, including the undertaking of EIAs and/or SEAs, but also the private sector.

Table of recommended elements to be included in the EU Guidance:

Objective	EU Guidance should address the following	Main actor(s)
Provide guidance to Member States	Choice of indicator species.	TG Noise in consultation with Regional Seas Conventions (RSCs)
	Choice of Level of Onset of Biologically adverse Effects (LOBE).	TG Noise in consultation with Regional Seas Conventions (RSCs)
	Synergies with international and EU commitments to meet the Paris Agreement goal of limiting global temperature increase to 1.5˚C. by moving towards a decarbonized energy transition, lowering GHG emissions, including those from commercial shipping.	EU Commission

	Measures following best practices and applying best available techniques and technologies to reduce underwater noise levels for all noise generating activities, including specific measures such as slower speeds for ships, speed limit areas, quieting technologies etc[19].	TG Noise
	Assistance with the adoption of mitigation strategies by Member States, in accordance with regional cooperation, including management of water traffic and consideration of interactions between measures to reduce underwater noise and other environmental objectives.	EU Commission
	EU and Member State input to the IMO and various international Regional Sea conventions, following the agreement on the revised IMO guidelines on underwater noise and next steps, to ensure appropriate measures are taken through the IMO and specific international regional sea conventions to reach the objective of underwater noise reduction from shipping.	EU Commission
	Regarding impulsive underwater noise generating activities, Member States shall be encouraged to ban oil and gas exploration activities (seismic surveys) in line with the energy transition meeting the climate objectives of the Green Deal, and impose measures of noise mitigation	EU Commission

[19] Please take note of the CMS Technical Series No.46 - Best Available Technology (BAT) and Best Environmental Practice (BEP) for Mitigating Three Noise Sources: Shipping, Seismic Airgun Surveys, and Pile Driving (CMS Technical Series No.46)

	and reduction at source when promoting the development of renewable energy production.	
	Foster investment in research and innovation regarding promising technologies in this field.	EU Commission
	Ensure that there is a comprehensive understanding about the accuracy and potential deficits of data sets within the impulsive noise registries and how threshold values are assessed. The data and methods used for the assessment of threshold values should be available and documented to facilitate transparent reviews (for example by TG Noise). The potential implications of any missing data on impulsive noise generating sources, for example from activities using active military sonar systems, should be considered when comparing any assessments to threshold values.	TG Noise, EU Commission, ICES, RSCs
	Raising awareness amongst citizens and stakeholders on underwater noise pollution and its impacts on marine habitats and species.	EU Commission
Collaboration with Stakeholders	Identify and promote capacity building, training and information exchange between the private sector of noise generating industries and regulatory bodies, Member State representatives, scientific experts and civil society towards achieving GES.	EU Commission with TG Noise inputs

	Provide advice on measures to reduce noise from individual ships, in line with EU legislation such as the MSFD and the revised IMO guidelines for the Reduction of Underwater Noise from Shipping.	EU Commission with TG Noise inputs
	Provide advice on operational measures to facilitate slower speeds, including optimised port entry systems and examples of incentives for slower steaming.	EU Commission with TG Noise inputs
	Promote the implementation of the revised IMO Guidelines, regarding noise management planning, to achieve underwater noise reduction goals.	EU Commission with TG Noise inputs
	Promote the implementation of speed reduction as part of the short-term measures under the new IMO Strategy on reduction of GHG emissions from shipping, to simultaneously lower underwater noise and GHG emissions.	EU Commission with TG Noise inputs
	Promote best practices, on technical measures such as innovative hull and propeller design, wake optimisation, innovative isolation solutions, alternative power sources which contribute to a reduction of the required engine power and the amount of thrust to be generated by the ship's propeller (i.e., wind propulsion systems, onshore power systems), regular maintenance; as well as operational measures such as speed reduction/optimisation.	EU Commission with TG Noise inputs

	Education and training of ship crews: training of crews on the impacts of underwater noise and best practices to mitigate it, such as reducing unnecessary operations and avoiding changes in speed and direction.	EU Commission with TG Noise inputs

There are several technical and operational measures available to reduce underwater radiated noise from the shipping sector. IFAW believes that a realistic and impactful solution exists to make **the seas safer and quieter for marine animals: reduced shipping speeds to a maximum of 75% of the ship's design speed**[20]. Speed reduction is a measure that can be easily implemented with the existing fleet. The International Maritime Organization Guidelines[21] underline that *"reducing ship speed can be a very effective operational measure for reducing underwater noise"*.

A recent study[22] has shown that an average speed reduction of 10% across the global fleet could reduce underwater noise pollution from shipping by up to 40% and shipping greenhouse gas emissions by 13%. Such ship speed reductions – Blue Speeds – would also result in co-benefits for biodiversity, such as halving the risk of collisions with whales, and by reducing air pollution for humans [23]. Blue Speeds would also result in significant economic and environmental gains for the maritime industry and society as a whole: depending on fuel prices, the total benefits of Blue Speeds in Europe are estimated to be between EUR 3.4 billion and 4.5 billion per year. These savings would make the maritime industry competitive and could be in

[20] Leaper, R., 2019. The role of slower vessel speeds in reducing greenhouse gas emissions, underwater noise and collision risk to whales. Frontiers in Marine Science, 6(Article 505). Available at: https://www.frontiersin.org/journals/marine-science/articles/10.3389/fmars.2019.00505/full

[21] Ref (imo.org)

[22] CE_Delft_210439_Blue_Speeds_for_shipping_Def.pdf (cedelft.eu)

[23] Leaper, R., 2019. The role of slower vessel speeds in reducing greenhouse gas emissions, underwater noise and collision risk to whales. Frontiers in Marine Science, 6(Article 505). Available at: https://www.frontiersin.org/journals/marine-science/articles/10.3389/fmars.2019.00505/full

line with other long-term goals and international commitments of the EU (e.g., the Green Deal, SDGs).

Ship Strikes

In addition to the recommended EU-wide implementation of Blue Speeds, which would reduce overall ship strike risk to cetaceans throughout EU waters, the EU should also implement the guidance for reducing the risk of ship strikes with cetaceans developed by the IMO in 2009 (MEPC.1/Circ.674[24]). This IMO guidance outlines principles to be taken into account and actions to be taken to minimise the risk of ship strikes with cetaceans.

Critically, the IMO has recognised that minor ship routeing changes in high risk areas that shift high volumes of shipping traffic away from critical whale habitat could lead to a substantial reduction in strikes, and that such re-routeing measures are the best mitigation measure (MEPC 69). Where re-routeing is not possible, due to factors such as whale distribution, whale behavior/habitat use, and/or ship routeing options and limitations, vessel speed restrictions offer the most straightforward solution to reduce risk.

The IMO guidance stresses that any actions taken to implement a ship strike reduction strategy should be disseminated broadly to the maritime industry and made clear through the appropriate channels to the affected industry. Re-routeing and speed reduction measures must be enforced to be effective.

Given the large number of cetacean species present, high densities of shipping traffic throughout and several high risk areas identified in EU waters, and protection obligations under the existing EU legislation, there is an urgent need for a joined up approach to ship strikes at the European level. The participative drafting of a dedicated EU Action Plan, coherent with the IMO guidance mentioned above, would

[24] https://wwwcdn.imo.org/localresources/en/MediaCentre/HotTopics/Documents/674.pdf

help to coordinate and promptly implement effective measures to address ship strike in EU waters.

Addressing bycatch effectively

Comprehensive, concrete mitigation measures that follow scientific recommendations need to be implemented in a timely manner to help safeguard protected marine species from bycatch.

In the short term, time-area fishing closures are the most effective measure to protect marine species. This was clearly seen in 2024 during the fishing closure in the Bay of Biscay[25], which saw a dramatic decline in the recorded number of dead dolphins with evidence of bycatch. These closures will be repeated in 2025[26] and 2026.

A transition towards sustainable and just fisheries is urgently required to make a lasting impact. IFAW recognises that fishing closures imply that there will be significant profit loss across the sector if nothing is done to bridge this income gap.

Therefore, incentive schemes and rewards for fishermen will be needed to help fisheries with the highest bycatch levels make the changes needed in the EU. IFAW believes that incentive-based solutions could help change fishing practices to mitigate bycatch, while collecting additional scientific data to establish the most effective measures. This is possible to achieve by allocating bonus/malus fishing rights according to certain criteria to be defined (e.g., dolphin bycatch numbers per boat, fishing in sensitive areas, type of gear used, collection of scientific data).

To facilitate this transition, the fisheries system and policies must change at the national level. Under Article 17 of the European Union's Common Fisheries Policy (CFP), the EU Member States' fishing rights should be allocated according to

[25] Bay of Biscay Fishing Closure Demonstrates Impact on Dolphin Conservation - The Fishing Daily - Irish, UK and European Fishing Industry News

[26] Commission takes measures to reduce incidental catches of dolphins and small cetaceans in the Bay of Biscay based on Member States recommendation - European Commission

economic, social and environmental criteria. However, social contribution and environmental impacts are still not adequately considered and offer room for innovation. With its ageing fleet facing regulatory, financial and technological constraints, the European fishing industry is at a turning point.

While it has been in force since 2014, poor implementation of the CFP by the EU and its member countries is preventing its objectives for sustainable fisheries in Europe from being achieved.[27] Concrete solutions[28] are needed to urgently address the challenges of implementing the CFP. For example, the EU Council, national governments and fishers must work together and follow scientific advice to end overfishing, transition fairly (in terms of socio-economics) to low-impact fisheries to mitigate negative impacts on ecosystems (e.g. bycatch of endangered species), and include a climate component in fisheries management (e.g. lessen the impact of the fishing sector on global greenhouse gas emissions).

Effective international cooperation

The EU Oceans Pact should also drive the EU's global ocean governance agenda by pairing political will with structural capacity for effective BBNJ implementation. To lead by example, the EU must set high biodiversity standards through domestic policies and external actions. The EU External Action Service and Member States should prioritize diplomacy, international engagement, and active participation in international and regional bodies to promote BBNJ objectives. Through its Global Ocean Programme, the EU is already supporting developing countries in ratifying and implementing the BBNJ Treaty. Sustaining and expanding such initiatives will be critical for long-term ocean health, underscoring the importance of multilateral efforts.

[27] EC report of June 2021: https://ec.europa.eu/commission/presscorner/detail/en/ip_21_2875
[28] Concrete examples available here - Feedback from: Seas At Risk

A coordinating body is essential to ensure harmonisation across all services and DGs on BBNJ issues. This body needs the authority and resources to monitor progress, recommend adjustments, and address inconsistencies promptly. The Inter-Service Group- the entity overseeing the Oceans Pact across the Commission- could establish a dedicated task force to ensure DG's sector-specific plans align with the BBNJ Agreement, including taking into account cumulative impacts in decision-making, and review or develop policies as needed to support the Agreement's objectives. Harmonized regulations and guidelines under EU competence will support Member States implementation of BBNJ obligations across different fora and help foster stronger regional partnerships for High Seas cooperation. The body could also, upon request, advise Member States on improving national coordination on aligning sector-specific plans with BBNJ objectives that fall under their competencies.

The Ocean Fund

IFAW believes that an EU Ocean Fund dedicated to the long-term restoration and conservation of the marine environment, and to the just transition to a sustainable, low impact blue economy would be crucial. Subsidies that are harmful to the marine environment should be eliminated as soon as possible and no later than 2027, both at the EU and Member State levels. The revision of the EU Multiannual Financial Framework (MFF) in 2027 will be an opportunity to do so, as well as a chance to increase the level of funding dedicated to the ocean overall.[29]

[29] Blue Manifesto - Seas At Risk

Resources connected to the issues raised by IFAW

Challenges

- Underwater Radiated Noise (URN) - Leaper, R., 2019. The role of slower vessel speeds in reducing greenhouse gas emissions, underwater noise and collision risk to whales. Frontiers in Marine Science, 6(Article 505). Available at: https://www.frontiersin.org/journals/marine-science/articles/10.3389/fmars.2019.00505/full. Leaper, R., Renilson, M. R. & Ryan, C., 2014. Reducing underwater noise from large commercial ships: current status and future directions. Journal of Ocean Technology, Volume 9, pp. 50-69.
- Ship strikes – Recent scientific study (https://www.science.org/doi/10.1126/science.adp1950), IFAW Briefing (https://d1jyxxz9imt9yb.cloudfront.net/resource/1114/attachment/original/Ship_strikes_and_whales_-_factsheet.pdf),
- Bycatch - Case study (https://d1jyxxz9imt9yb.cloudfront.net/resource/1738/attachment/original/IFAW_Bay_of_Biscay_dolphin_bycatch_Roadmap__1_.pdf)
- International cooperation – High Sea Treaty Briefing
- The health of the ocean and the EU's competitiveness – Blue Manifesto - Seas At Risk

Suggested measures

- URN and Blue Speeds - CE Delft (2022) Blue Speeds for shipping: Economic analysis and legal framework to achieve environmental benefits(https://cedelft.eu/wp-content/uploads/sites/2/2022/10/CE_Delft_210439_Blue_Speeds_for_shipping_Def.pdf), IFAW Briefing (https://bluespeeds.org/wp-content/uploads/2023/06/briefingDigital.pdf)
- Ship strikes – IMO GUIDANCE DOCUMENT FOR MINIMIZING THE RISK OF SHIP STRIKES WITH CETACEANS
- Addressing bycatch effectively – Case study (https://d1jyxxz9imt9yb.cloudfront.net/resource/1738/attachment/original/IFAW_Bay_of_Biscay_dolphin_bycatch_Roadmap__1_.pdf)
- Effective international cooperation – High Sea Treaty Briefing
- The Ocean Fund – Blue Manifesto - Seas At Risk

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