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Comment Letter

Feedback on TNFD Draft sector guidance: Fishing, Marine transportation and cruise lines, Water Utilities

On behalf of the Interreg Euro-Med Project: ARTEMIS

Introduction

This comment letter is based on consortium-wide feedback¹ from the [ARTEMIS project](#). The project is funded by Interreg Euro-MED and aims to develop solutions for restoring and conserving seagrass meadows in the Mediterranean. This involves collaboration with multidisciplinary experts from five European countries to achieve the project goals within the projected timeline. The project started in January 2024 and will finish in June 2026 with a total duration of 33 months.

Feedback applicable to all three sectors

1. **Inclusion of Seagrass Ecosystems:** All three sectors would benefit from explicitly mentioning seagrass ecosystems, particularly *Posidonia oceanica*, which is endemic to the Mediterranean and found in 11 European countries. Seagrass meadows are overall underrepresented in the sector guidance, despite their critical role in marine ecosystems, including carbon sequestration, coastal protection, and providing habitat for numerous marine species. Integrating references to relevant decisions, resolutions, documents, and guidelines, such as from the Ramsar Convention, the Convention on the Conservation of Migratory Species (CMS, Bonn Convention), the Bern Convention, and the Barcelona Convention for the Mediterranean Sea, would highlight the importance of these habitats. Additionally, documents like the Annex II of the SPA/BD protocol, the Action Plan for the Conservation of Marine Vegetation in the Mediterranean Sea (2005), and the Guidelines for Impact Assessment on Seagrass Meadows (2007) could be mentioned. Apart from these, the Paris Agreement could be referenced, as Article 5, paragraph 1, states that "Parties should take action to conserve and enhance, as appropriate, sinks and reservoirs of greenhouse gases as referred to in Article 4, paragraph 1(d), of the Convention." Seagrass meadows are CO2 sinks, which stresses an

¹ This comment letter represents the opinion of the majority of partners within the ARTEMIS project.





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additional 'quality' of seagrass meadows and *Posidonia* in particular as blue carbon habitats.

2. **Impact Screening and Metrics:** There is a need for more specific metrics related to the impact on seagrass meadows. This includes tracking chemical and nutrient pollution, turbidity, and anchoring activities that affect these sensitive habitats. Metrics should also cover the real cover of seagrass meadows, and the number of ships fined for harmful practices.
3. **Restoration and Ecosystem Services:** All sectors should adopt a mentality of investing in nature and ecosystem services. This involves supporting restoration activities and participating in Payment for Ecosystem Services (PES) schemes to contribute to the health, restoration, and sustainability of marine ecosystems, whether as stewards of our natural capital or beneficiaries of the ecosystem services it provides. Companies should be urged to invest in ecosystem services, particularly those that the sector relies on. The concept of 'transformation' allows for bold, novel suggestions, which could be expanded across various sectors linked to marine ecosystems and ecosystem services, including the fishing sector. Additionally, incorporating offsetting measures could further enhance the positive impact on marine ecosystems.
4. **Clarity and Detail in Guidance:** Enhancing the clarity and detail in the guidance documents is crucial. This includes providing more specific recommendations, such as banning harmful gear and holding users responsible for restoration efforts or ensuring best practices regarding the cruise vessels and the smaller vessels used to transfer passengers to shallower waters or the coast on seagrass ecosystems, and ensuring definitions and explanations are clear and distinct.
5. **Alignment with Standards:** Aligning sector-specific guidance with established standards, such as the GRI 13 Standard (for Agriculture, Aquaculture and Fishing), would ensure consistency and comprehensiveness in addressing environmental impacts and promoting sustainable practices.

Feedback on draft sector guidance: Fishing

The numbers do not refer to the original numbering of questions within the TNFD feedback survey.

Currently the only mention of seagrass occurs on page 29, table 58.

1. Does the form and structure of this guidance support your understanding of how the LEAP approach applies in your sector?



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- Yes
2. What additional content would be useful for the guidance to include?
 - The guidance could be improved by explicitly mentioning the Convention on the Conservation of Migratory Species document (UNEP/CMS/COP14/Doc.27.4.3) related to seagrass ecosystems, since CMS is already mentioned.
 3. Is there any material that you thought was not useful, confusing or incorrect?
 - No
 4. How can the draft guidance to support application of the core global metrics to this sector be improved, in line with the principles above? Is any further additional guidance required? What should it cover?
 - The draft guidance could be improved by enhancing section C.1.1 (extent of ocean use change) in Table 14. While it mentions the avoidance of harmful gear, it should go further by recommending that such gear be banned and that users responsible for causing harm, such as through trawling, take responsibility for restoration efforts. This additional guidance would promote the adoption of good practices and strengthen the overall application of the core global metrics in the sector.
 5. Are the proposed core sector metrics meaningful and decision-useful for report users?
 - Yes
 6. What other, if any, positive impact metrics and opportunity metrics are relevant in this sector?
 - Relevant positive impact metrics for the sector include the actual cover of seagrass meadows, such as *Posidonia oceanica*, in areas of fishing activity. Linking this metric to average biodiversity and carbon ecosystem service flows, when data is available, can provide valuable insights into the ecosystem services at risk. Additionally, tracking the number of ships fined for trawling in seagrass meadows each year can serve as an important metric for assessing compliance and the effectiveness of conservation efforts.
 7. Does this guidance accurately reflect the relationship between fishing companies and national / international fishery management bodies (e.g. government departments, RFMOs etc), especially with regards to each entity's respective responsibilities?
 - The guidance primarily addresses the responsibilities of large fishing companies, but it lacks clarity on how it impacts government departments, international



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fishery management organizations and small-scale fisheries.

8. How could the guidance better integrate blue carbon considerations? The guidance already includes multiple references to blue carbon. Given that it is a guideline, it is likely sufficient in its current form and may not need to delve further into detail.
9. In the sector-specific guidance for TNFD core global metric C3.1 (quantity of high-risk natural commodities sourced under a sustainable management plan or certification programme, including proportion of total high-risk natural commodities). Do you agree with the use of Maximum Sustainable Yield (MSY) and point of recruitment impairment (PRI) as stock status performance indicators to define a 'sustainably managed stock'? (Core global disclosure metric - C3.1 = quantity of high-risk natural commodities sourced under a sustainable management plan or certification programme, including proportion of total high-risk natural commodities.)
 - The use of Maximum Sustainable Yield (MSY) and point of recruitment impairment (PRI) as stock status performance indicators is accurate. However, the current explanation is unclear, as the definitions of sustainably managed and unsustainably managed fisheries seem to blend together. This needs to be clarified.
10. Should the sector-specific guidance for TNFD core global metric C1.1 (extent of ocean-use change) align with the GRI 13 Standard by replacing 'area fished' (current TNFD draft metric) with 'area of natural ecosystems converted since the cut-off date' (GRI 13)? (Core global disclosure metric - C1.1 = extent of ocean-use change)
 - Aligning the sector-specific guidance for TNFD core global metric C1.1 with the GRI 13 Standard (on Agriculture, Aquaculture and Fishing) by replacing 'area fished' with 'area of natural ecosystems converted since the cut-off date' would be more consistent with general recommendations and the SBTN framework's definition of land/sea use change. 'Area fished' would be better suited to TNFD Core Global Metric C1.0, as it indicates the area affected by the company.
11. For the section on "Ecosystem protection, restoration and regeneration" in table 118, we suggest adding a subcategory focusing on restoration. This could include ensuring that sensitive habitats damaged by activities linked to the fishing sector are restored.
12. Regarding the section on "All business transformation options" in table 12, we suggest the adoption of a 'invest in nature and ecosystem services' mentality. Companies should be urged to invest in ecosystem services, particularly those that the sector relies on. The concept of 'transformation' allows for bold, novel suggestions, which could be expanded



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across various sectors linked to marine ecosystems and ecosystem services, including the fishing sector.

Feedback on draft sector guidance: Marine transportation and cruise lines

The numbers do not refer to the original numbering of questions within the TNFD feedback survey.

Currently the only mention of seagrass occurs on page 27, and page 33.

1. What additional content would be useful for the guidance to include?

- To enhance the guidance, Table 10 should include information similar to that in Table 58 for the fishing sector, along with a list of useful datasets and tools, as provided in the fishing sector guidance. Additionally, the term "seabed damage" in Table 10 is quite general and could be more specific by mentioning habitats being damaged, such as seagrass meadows, and the multiple ecosystem services that flow from these healthy habitats, similar to the details in Table 58 of the fishing guide.
- Focusing especially on the cruise sectors, the operators should ensure minimum impact on seagrass ecosystems from the various recreational activities offered to passengers. In addition to ensuring the avoidance of anchoring of the main cruise vessel, best practices need to be followed by the smaller vessels used to offer cruise passengers access to the shallower waters or the coast in order to avoid anchoring and impacting seagrass ecosystems. At the same time, they can use these recreational activities in order to inform passengers on these ecosystems. In addition, these activities can form the base of a payment for ecosystem services (PES) scheme to support the conservation and restoration of these ecosystems (see point below).

2. What other sector metrics should be considered by the Taskforce? Should they be core or additional?

- Under C1.1, it would be beneficial to include specific metrics related to anchoring in high-value marine habitats like seagrass meadows, as anchoring is a major impact driver on meadow health. This could involve tracking the number of landings over these habitats.

3. What other, if any, positive impact metrics and opportunity metrics are relevant in this sector?



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- Sensitive areas previously used for anchoring actively avoided as part of the company's strategy.

4. Do you have any further suggestions for nature-related opportunities for marine transportation and cruise line organisations (see Table 12)?

- Cruise ships could offer passengers diving and snorkeling experiences while ensuring they anchor far from seagrass meadows to protect these ecosystems. Additionally, they could participate in a Payment for Ecosystem Services (PES) scheme to support the managers or stewards of the seagrass areas, whether within protected areas or not, or those responsible for their restoration. This approach could be expanded to include contributions from both the cruise and maritime transport sectors to support restoration activities.

Feedback on draft sector guidance: Water utilities

The numbers do not refer to the original numbering of questions within the TNFD feedback survey.

No mention of seagrass in the sector guidance.

1. What additional content would be useful for the guidance to include?

- To enhance the guidance, it would be beneficial to include references to seagrass, particularly *Posidonia* meadows. Impact screening should consider actors in the downstream water sector, such as agriculture, household, industrial, and wastewater treatment, that discharge water back into the environment. The main impacts to address include chemical and nutrient pollution, as well as turbidity, which affect seagrass meadows near discharge sites, such as river mouths. These pollutants can include nitrogen, phosphorus, heavy metals, and pesticides. A high-level integration of *Posidonia* meadows into the document would be a good starting point.