



Implementing the EU Nature Restoration Regulation at Sea

**Guidance for Policymakers
and Civil Society**

DECEMBER 2025

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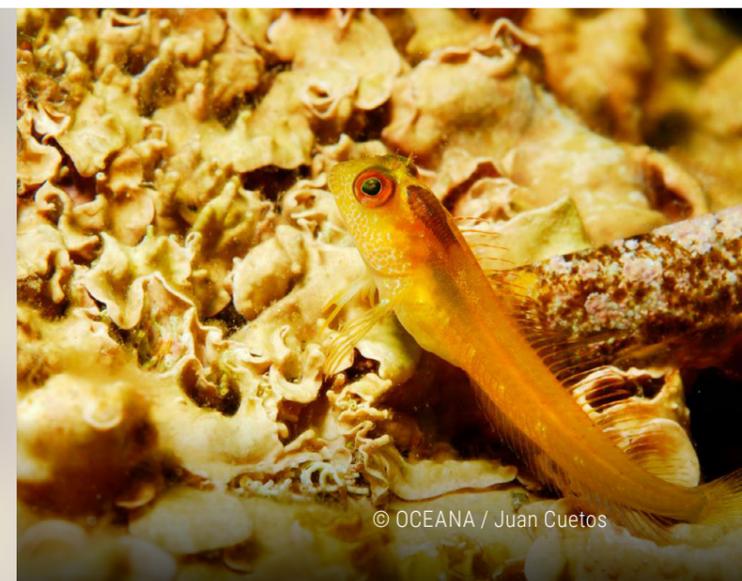
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Background and Introduction



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European seas have suffered extensive biodiversity loss due to increasing pressures from human activities and are now classified as being in poor condition.

The ocean is also strongly affected by climate change, due to warming, deoxygenation and acidification, which risks further harming marine ecosystems going forward. Overfishing and habitat degradation are among the primary drivers of declining marine biodiversity. Yet, the EU Nature Restoration Regulation (**NRR**), which entered into force in August 2024, can play a crucial role in mitigating climate change, reversing the loss of nature and supporting thriving coastal communities.

The NRR is the most important nature conservation law in the EU over 30 years (since the EU Habitats Directive). Promised as part of the EU Biodiversity Strategy for 2030, the NRR will be the key legal tool for nature restoration in the EU from now until 2050.

While the EU Birds and Habitats Directives are still essential for nature conservation, the NRR is groundbreaking because it sets out key new duties for Member States to not only conserve but proactively restore the natural environment, including terrestrial, coastal, marine ecosystems and others. Unlike the Habitats Directive, the NRR is a 'regulation'. This means that it is directly applicable to the Member States and bypasses the delays usually associated with transposition into national law.

The NRR also sets timebound restoration targets, which are missing from the Habitats Directive. In broad terms, Member States are required to put in place effective and area-based **restoration measures covering 20% of EU land and sea areas by 2030 and all ecosystems in need of restoration by 2050**. It should be noted that these are the overarching targets; the more precise and enforceable targets for marine ecosystems are set out in Article 5 NRR (addressed in more detail below). This guidance is primarily concerned with marine ecosystems; terrestrial and coastal ecosystems are not considered in detail.

Each Member State is required to develop a National Restoration Plans (**NRP**), which among other things should set out the measures that will be put in place in order to achieve the NRR's restoration targets. The Member States must submit draft NRPs to the European Commission by **1 September 2026**. The development of the NRPs is a critical moment in implementation of the NRR and for advocacy with national governments and the Commission.

The purpose of this briefing is to provide an overview of the key NRR provisions affecting nature restoration at sea. This should assist stakeholders and policymakers in understanding better how the NRR may affect their work and provide greater knowledge to support advocacy on the implementation of the NRR in Member States, for example through engaging on the development of the NRPs.



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Overview of Key Provisions



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Article 1 (Subject matter) and Article 3 (Definitions)

The Nature Restoration Regulation aims to contribute to the long term sustained recovery of ecosystems in the EU's lands and seas through the restoration of degraded ecosystems, as well as achieving climate mitigation and adaptation, enhancing food security and meeting the EU's international commitments (for example under the Kunming-Montreal Global Biodiversity Framework).

At least 20% of land and 20% of seas areas falling within the scope of the regulation shall be covered by **restoration measures by 2030, and all ecosystems in need of restoration shall be covered by 2050.**

'Restoration' is defined under Article 3(3) NRR as the **active or passive process of "assisting recovery of an ecosystem** in order to improve its structures and functions, with the aim of conserving or enhancing biodiversity and ecosystem resilience, through improving a habitat of a species to sufficient quality and quantity".

Article 3 also includes important definitions for 'good condition', 'favourable reference area', 'sufficient quality of habitat', and 'sufficient quantity of habitat', which should be consulted as appropriate.

Article 5 (Restoration of marine ecosystems)

Types of restoration measures to be put in place

Article 5 of the NRR provides for the restoration of marine ecosystems. In broad terms, Member States are required to put in place three types of restoration measures:

- i. measures to restore habitat types that are not in good condition (the relevant habitat types are listed in seven different groups in Annex II NRR);
- ii. measures necessary to re-establish these habitat types in areas where they do not occur in order to reach the 'favourable reference area' for the particular habitat type; and
- iii. measures to restore the marine habitats of species listed in Annex III NRR as well as relevant Annexes for species in the Habitats Directive and wild sea birds falling within the scope of the Birds Directive.

Annex II and III NRR are extremely important because they provide a comprehensive list of marine habitat types and species which need to be protected through restoration measures. Notably, these Annexes go some way to

addressing shortcomings in the Annexes to the Habitats Directive, which have only a limited coverage of marine habitat and species.

The restoration measures are also differentiated depending on the groups listed in Annex II NRR. Groups 1 to 6 relate to seagrass beds, macroalgal forests, shellfish beds, maerl beds, coral, sponge and coralligenous beds, and vents and seeps. Group 7 relates to soft sediments not deeper than 1000 metres of depth:

For **groups 1 to 6**, restoration measures need to be put in place according to the following schedule:

1. Restoration measures to cover habitat types not in good condition:
 - a. By 2030, on at least 30% of the total area of the habitat types that are not in good condition
 - b. By 2040, on at least 60% of the area for each group that is not in good condition
 - c. By 2050, on at least 90% of the area for each group that is not in good condition
2. Restoration measures which are needed to re-establish the habitat types they are no longer present, with the aim of reaching the favourable reference area:
 - a. By 2030, the restoration measures must cover at least 30% of the additional surface area required needed to reach the favourable reference area.
 - b. By 2040, they must cover 60% of the applicable surface area
 - c. By 2050, they must cover 100% of the applicable surface area

For **group 7**, restoration measures need to be put in place according to the following schedule:

1. Restoration measures to cover habitat types not in good condition:
 - a. By 2050, on a percentage, identified in accordance with Article 14(3)¹, of the area of the group that is not in good condition.
 - b. By 2040, on at least two-thirds of the percentage referred to above.

For **group 7**, there is no re-establishment target.

The third type of restoration measure relates to the marine habitats of species. In addition to the above measures, Member States **need to put in place restoration measures for the marine habitats of species listed in Annex III NRR** (including different species of sharks and rays) **and the relevant Annexes of the Habitats and Birds Directive** (marine mammals, seabirds) with the aim to **improve the quality and quantity of those habitats** including through reestablishing them and by improved connectivity (Article 5(5)).



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¹Article 14(3) simply provides that Member States shall set in their national restoration plans the percentage for this purpose, thereby giving a large, and perhaps counterproductive, discretion to Member States. This discretion is at least limited insofar as a Member State must still set the percentage at a level that will not prevent "Good Environmental Status" (GES) from being achieved or maintained.

Best available science and filling the knowledge gap (Articles 5(6) and 5(7))

Article 5(6) makes clear that Member States must determine the most suitable areas for restoration measures based on the best available knowledge and the latest technical and scientific progress in determining the condition of the habitat types in Annex II NRR.

Member States also have an obligation to fill knowledge gaps on the conservation status of marine ecosystems – which is particularly important given the lack of knowledge of marine ecosystems when compared to other ecosystems. In particular, Article 5(7) requires Member States to ensure that the condition is known of the following areas:

- i. By 2030, the condition for **at least 50% of the area distributed** over all habitat types in groups 1 to 6 of Annex II
- ii. By 2040, the condition **for all areas of the habitat types** in groups 1 to 6 of Annex II and **at least 50%** of the area distributed for group 7 habitats
- iii. By 2050, **for all areas** of the habitat type listed in group 7

Additional time is given for habitats in group 7 because they cover large areas of the seabed and are harder to survey.

Non-deterioration and continuous improvement obligations

One very important aspect of the NRR is the need to ensure that areas which are subject to restoration measures show a continuous improvement and do not deteriorate. Without such a safeguard mechanism, there is a major risk that long-term restoration efforts would be undermined by the failure to properly manage and protect the areas that have been restored. For example, there is not much point in restoring a seabed only to allow it to be destroyed by bottom trawling a few years afterwards.

For marine ecosystems, these duties are set out in Articles 5(9) and (10) NRR, and can be broadly categorised as follows:

- **The “continuous improvement obligation”** (Art 5(9), first sentence), which requires Member States to put in place measures to ensure that areas that are subject to restoration measures show a continuous improvement in the condition of the habitat types in question until good condition is achieved. This duty applies from the time the restoration measures are taken and, at the latest, by the deadlines set by Articles 5(1) and 5(2)
- **The “non-deterioration of restored habitats (and habitats in good condition) obligation”** (Art 5(9), second sentence), which requires Member States to put in place measures to ensure that areas in which good condition has been reached, and in which the sufficient quality of the habitats of the species has been reached, do not significantly deteriorate. This duty applies once good condition and/or sufficient quality has been reached.
- **The “pre-restoration non-deterioration obligation”** (Art 5(10)), which requires Member States to endeavour to put in place necessary measures with the aim of preventing significant deterioration of areas where the habitat types listed in Annex II to this Regulation occur and which are in good condition or are necessary to meet the restoration targets set out in Art 5(14) NRR. These measures need to be put in place by the date of the publication of the national restoration plans.

It is important to be aware that **there are several derogations available to Member States to justify not meeting the non-deterioration obligation**. Detailed consideration of these derogations is beyond the scope of this paper, but readers are encouraged to consult Article 5(11) – (13) NRR where these derogations are set out.

For more information on the non-deterioration obligation and the applicable derogations, please refer to the document [“Restore Now, Destroy Later? A Legal Analysis of the Non-Deterioration Obligations in the Nature Restoration Regulation and beyond”](#)

Chapter III NRR - National Restoration Plans

As already mentioned, the NRPs are a key feature of the NRR because they are the vehicle through which the Member States are required to set out in detail how they will achieve the restoration targets. Importantly the NRP must also be submitted in draft form to the Commission for scrutiny.

In broad terms, the NRPs must include details of how each Member State will restore the designated areas to good condition as well as fill the knowledge gaps Member States may have. Drafting plans requires a holistic approach, including by considering other EU policies such as the Common Fisheries Policy, the Habitats and Birds Directives, the Marine Strategy Framework Directive and the Renewable Energy Directive. Active participation of stakeholders, including local communities is also a key feature of the preparation of the NRPs. Member States are required to submit their draft NRPs to the Commission by 1 September 2026.

For more detailed guidance on the NRP process, please refer to the Restore Nature campaign document [Guidance and Recommendations For Ambitious Nature Restoration Plans](#).

Article 14 (Preparation of the national restoration plans)

Article 14(1) states that Member States must each prepare an NRP and carry out the preparatory **monitoring and research** to identify **the necessary restoration measures** to achieve the restoration targets and meet the obligations set out in the NRR.

Quantifying the area that needs to be restored

Under Article 14(2), Member States **must quantify the areas that need to be restored** to meet the restoration targets set out in Article 5. For each habitat type, the quantification should include the following information:

- the **total habitat area** and a **map of its current distribution**
- The habitat area that **is not in good condition**
- The **favourable reference area**, taking into account **records of historical distribution** and the projected changes to environmental conditions due to climate change
- The **areas most suitable for the re-establishment** of habitat types in view of going and projected changes to environmental conditions due to climate change.

The quantification also needs to be based on information outlining the **sufficient quality and quantity of the habitats of the species required for reaching their favourable conservation status**, taking into account the areas **most suitable for re-establishment of those habitats, the connectivity** needed between them in order for the species population to thrive as well as ongoing and projected changes to environmental conditions due to climate change, etc.

Policy coherence and coordination with other Member States

Member States must also, when preparing their plans, **identify synergies with other policy areas** including **climate adaptation, land degradation neutrality and disaster prevention**, as well as coordinate with the mapping they need to do for the renewable energy acceleration areas (see Articles 14(9) and 14(13)).

Member States must also take account of other measures or strategies provided for under EU law, including:

- conservation measures established for Natura 2000 sites
- marine strategies to achieve Good Environmental Status under the Marine Strategy framework Directive (MSFD)
- conservation measures adopted under the Common Fisheries Policy (Article 14(14)).

Under Article 14(17) Member States shall, where possible, foster synergies with the national restoration plans of other Member States, in particular for ecosystems that span across borders or where Member States share a marine region or subregion within the meaning of the MSFD.

Process and engagement with other stakeholders

Member States **must include the public and other stakeholders from the start of the process** which needs to be “open, transparency inclusive and effective” (Art 14(20) NRR). This obligation is further backed by the Aarhus Convention on public participation in decision making on environmental matters. Specifically, Article 7² of the convention states that Member States will be required to create a **“transparent and fair framework”** for the public to participate in the

preparation of plans. This includes obligations for Member States to identify the relevant stakeholders and give them an opportunity to contribute.

Article 15 (Content of the national restoration plan)

Article 15 outlines the legal requirements for the **content of the national restoration plan**, which as already mentioned is the key tool in the NRR for planning restoration activities.

Timelines and the ‘stepped approach’

In general terms, the plans need to **cover the period up to 2050, with intermediate deadlines corresponding to the targets and obligations set out in 5** (see above).

Article 15 also sets out what has been called a “stepped approach” to the content of the plans. **Initially the plans must focus on the period up to 1 July 2032, while also setting a more general strategic overview up to 2050.** However, the more detailed content of the plans beyond 2032 is postponed until 2032 when a revision of the plans is required to cover in detail the period up to 2042. Then again in 2042 a further revision is required to cover up to 2050 in detail. The rationale behind this type of iterative process is that it allows for adjustments and revisions based on ongoing restoration activities and evolving scientific knowledge. On the downside, it creates a serious risk of unduly focussing on short-term planning, which could result in Member States neglecting to properly plan for 2050 until it is too late to meet the 2050 targets.

Content and format of the plans

Article 15(3) sets out the elements to be included in the national restoration plans, which should be consulted when necessary. Among other things,

² Further information on Article 7 Aarhus Convention can be found at <https://www.un-ilibrary.org/content/books/9789210574082/read>

it includes elements relating: the restoration measures or projects for the purpose of meeting the restoration targets; details of any derogations to be applied; a description of socio-economic impacts and benefits of the planned measures; and provisions relating to monitoring, financing and ensuring policy coherence. A detailed review of these elements is beyond the scope of this briefing. Please refer to the Restore Nature guidance [document](#).

The NRR requires the Commission to develop a “uniform format” for the national restoration plans, which is designed to ensure consistency and coordination in the development of the plans across the Union. This uniform format was [adopted](#) by the Commission in May 2025, and is available [here](#). **This is a key document for the purpose of the national restoration plans.**

In the marine context, it is also important to note that the plans need to include the conservation and management measures Member States intend to adopt under the Common Fisheries Policy, including joint recommendations they intend to initiate (See Article 15(4) NRR).

Article 17 (Assessment of the national restoration plan)

The Commission has an important duty to assess the NRPs in order to ensure that they meet the legal requirements and that the Member States are on track to meet restoration targets.

After each Member State submits its draft plan, which is due by 1 September 2026, the Commission has six months to assess the plan and address any observations to the Member State. As part of the assessment process the Commission must also be assisted by experts or the European Environmental Agency (EEA).

The Member State must then take account of the Commission’s observations in its final national

restoration plan, which is to be published within six months of receiving the observations.

Article 18 (Coordination of restoration measures in marine ecosystems)

Article 18 NRR aims to ensure proper coordination between restoration plans and fisheries policy under the Common Fisheries Policy (CFP). This article is of considerable importance since fishing is the major direct driver of marine biodiversity loss in Europe.

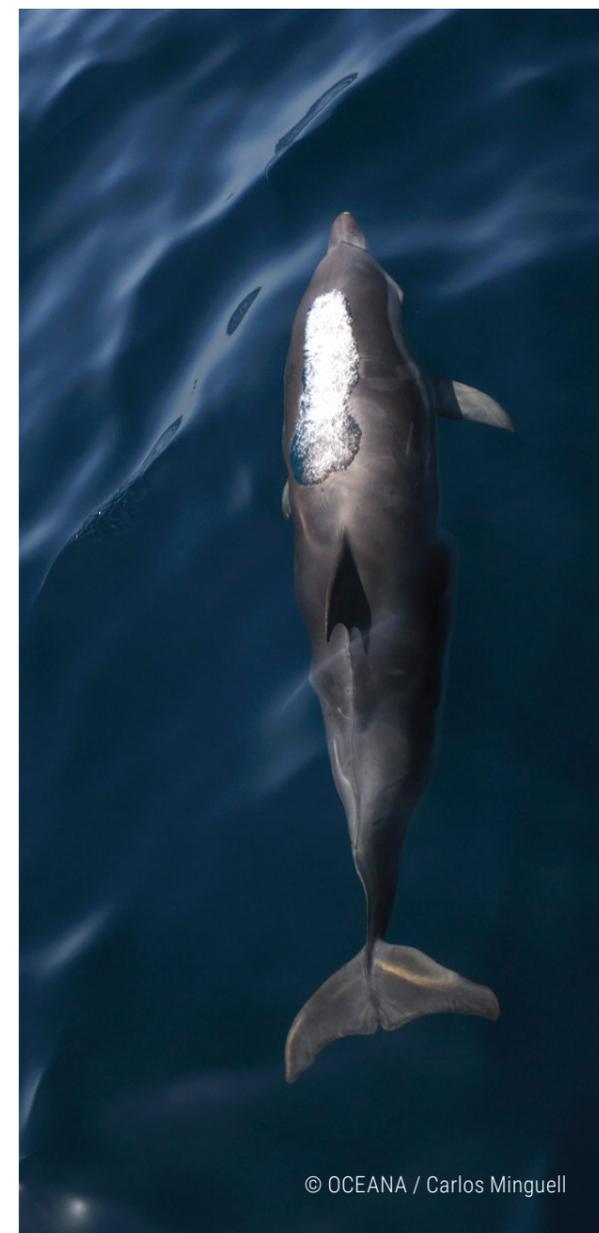
Article 18 is also important because of the historic problems with ensuring that EU Marine Protected Areas are properly protected from destructive fishing activities. This can be attributed to the failure to properly implement the CFP ‘joint recommendation’ procedure for establishing spatial conservation measures affecting fishing vessels. Article 18 NRR is designed to ensure that such shortcomings are not replicated in the national restoration plans.

Article 18(1) provides that “Member States whose national restoration plans include conservation measures to be adopted within the framework of the CFP shall make full use of the tools provided therein.” While this provision does not directly set down obligations, it is an important reminder to Member States to make proper use of the tools available in the CFP to achieve restoration. The most obvious example here is the ‘joint recommendation’ procedure under Articles 11 and 18 of the CFP Regulation, which is often the necessary tool for establishing conservation measures necessary for compliance with existing obligations under EU environmental legislation. However, there are also other important tools available under the CFP that should be considered; for example, the possibility of establishing fish stock recovery areas under Article 8 of the CFP Regulation.

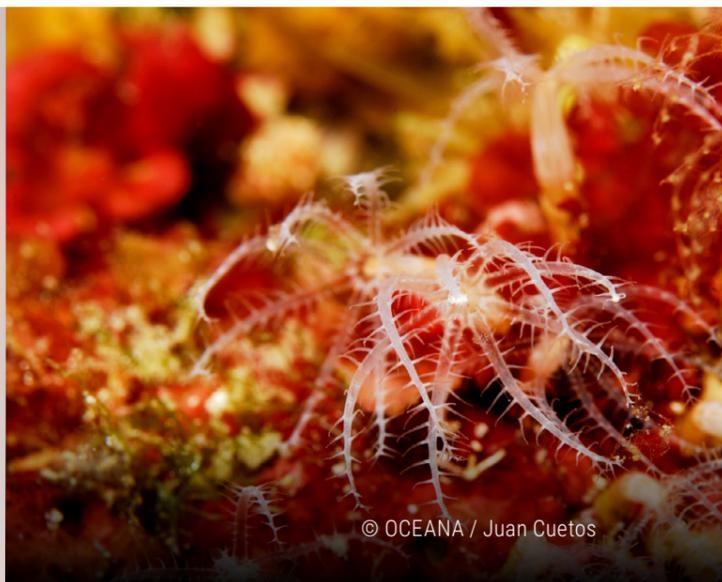
The remaining provisions of Article 18 are concerned with making the joint recommendation procedure more efficient for the purpose of achieving restoration targets. Article 18(2) therefore specifies that the Member States need to initiate “in a timely manner” consultations for joint recommendations that are to be included in the national restoration plans. This should help to ensure timely agreement and submission of joint recommendations. Furthermore, Member States “shall also include in the national restoration plan the estimated timing of the consultation and of the submission of the joint recommendations”.

Article 18(3) establishes an important deadline for the submission of joint recommendations: “Member States shall submit the joint recommendations on the conservation measures necessary to contribute to meeting the targets set in Article 5 **at the latest 18 months before the respective deadline.**” In practical terms, for 2030 restoration targets joint recommendations will need to be submitted at the latest by **June 2029**.

Article 18(4) serves as a useful reminder that the Commission has powers that it can invoke in the event that joint recommendations are not being submitted in time. Notably this encompasses the establishment of emergency conservation measures as provided for under Article 11(4) of the CFP Regulation.



NRR and Renewables



As part of the development of their NRPs, Member States must be mindful of considering the relationship between nature restoration and renewables, including the need for renewables' mapping under the Renewable Energy Directive (RED) alongside the development of their NRPs.

This is especially relevant since the RED has recently undergone sweeping amendments in the wake of the Russian invasion of Ukraine in order to accelerate the deployment of renewables in the EU. While tackling climate change is an urgent environmental priority, care needs to be taken to ensure that the RED is implemented so that climate and nature conservation goals are effectively aligned. Under the NRR, Member States need to coordinate the development of national restoration plans with the mapping of 'renewables acceleration areas' (RAAs) they are required in order to meet the 2030 renewable energy targets (Article 14(13)NRR). RAAs are areas where renewable energy projects are not expected to have a significant environmental impact and can be exempted from relevant environmental assessments under EU legislation.

Member States should not designate RAAs for offshore wind projects as these are large-scale industrial projects which, by nature, have a significant environmental impact and are therefore incompatible with the rationale behind RAAs. In fact, Article 15c(1a) specifies that protected areas, migratory routes and other nature sensitive areas should not be designated as RAAs. Future restoration areas are likely to be

"nature sensitive areas" and should therefore be excluded from becoming RAAs. Furthermore, the RED states under article 15b(3) that the multiple use of areas is to be favoured. While this may help to use space more efficiently – it also creates a risk that restoration areas could be compromised by the overdevelopment of renewables in the same space. While restoration within offshore wind farms should be encouraged when tailored to local habitats, it should not count towards restoration targets because these projects have negative impacts on marine ecosystems across their lifetime and considerable knowledge gaps remain in the decommissioning phase.

Implementing the Renewable Energy Directive may have impacts on implementing the NRR. As we have already seen, Member States have an obligation to show continuous improvement in the condition of the habitats under the NRR. But there is **flexibility and there can be derogations in the case of overriding public interest**; which includes the development of renewable energy. Member States should not make use of these derogations for renewable energy projects at sea as they risk undermining restoration efforts and the achievement of the NRR targets. For more detailed guidance on the linkages between the NRR and the Renewable Energy Directive, please refer to the ClientEarth guidance document '[Renewable Energy for Nature and People: A Practical Guide to the revised Renewable Energy Directive](#)', and Seas At Risk's paper '[Powering the future, preserving the ocean: a vision for nature-inclusive offshore renewables](#)'.



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Funding Nature Restoration



As noted above, NRPs must include a description of the estimated needs and intended sources of financing for the implementation of restoration measures (Article 15(3)(u)), including support for stakeholders affected by these measures. Financing may come from public or private sources and include EU co-financing.

While it remains difficult to precisely quantify the overall costs of fully restoring marine ecosystems, it is well established that healthy ecosystems provide critical climate mitigation, adaptation and protection benefits, often at relatively low cost. Restoration therefore constitutes a strategic investment for Member States rather than a financial burden. The European Commission has estimated that every euro invested in restoration can generate a return of more than €8, depending on the ecosystem concerned.

To date, Member States have been able to rely in part on the European Maritime, Fisheries and Aquaculture Fund (EMFAF) to support marine restoration, monitoring and knowledge-building activities, both inside and outside Natura 2000 areas. However, EMFAF is limited in scope and duration, as it runs only until the end of 2027, and [its track record shows structural shortcomings](#). [Between 5% and 12% of EMFAF funding continues to be channelled into biodiversity-harming subsidies](#), more than double the amount dedicated to biodiversity protection and restoration. **Looking ahead, it is therefore essential that Member States allocate sufficient and clearly earmarked resources for marine conservation and restoration within**



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their National and Regional Partnership Plans (NRPPs), ensuring long-term funding predictability under the next Multiannual Financial Framework. These NRPPs must be explicitly aligned with, and designed to deliver on, the priorities and targets set out in the Nature Restoration Plans, so that funding decisions effectively support NRP implementation across programming periods. We know that healthy ecosystems help protect, adapt and mitigate against climate change “[often at a very low cost](#)”; restoration is therefore an essential investment for Member States.

In addition, NRPs must include an indication of subsidies that would negatively affect the achievement of the Nature Restoration Regulation’s targets (Article 15(3)(v)). Subsidies are considered harmful when they have direct or indirect adverse environmental impacts, [including tax exemptions, state aid and rebates](#). Among ocean-based activities, the fisheries sector remains particularly affected by fossil fuel-based harmful subsidies, notably through indirect tax exemptions under the Energy Taxation Directive. Member States will therefore be required to identify such subsidies in their NRPs insofar as they undermine the Regulation’s objectives. Currently, the EU fishing fleet benefits from fuel tax exemptions estimated at between [€759 million and €1.5 billion annually](#), significantly weakening incentives for ecological transition and restoration.



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