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**Agenda Item 4: Review the findings of the mid-term assessment focusing on the Post-2020 SAPBIO start-up activities**

**Mid-term assessment focusing on the Post-2020 SAPBIO start-up activities with national scope: sub-regional reports**

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UNEP/MAP-SPA/RAC  
Tunis, 2025

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Specially Protected Areas Regional Activity Centre (SPA/RAC)  
Boulevard du Leader Yasser Arafat B.P. 337 - 1080 Tunis Cedex - Tunisia  
E-mail: [car-asp@spa-rac.org](mailto:car-asp@spa-rac.org)

### **Note by the Secretariat**

The present document includes the sub-regional reports of the Mid-term assessment focusing on the Post-2020 SAPBIO start-up activities with national scope used in the preparation of the preliminary findings of the mid-term assessment focusing on the Post-2020 SAPBIO start-up activities.

**Western Mediterranean Sea Sub-region report**

### List of Acronyms/Abbreviations

- CoP - Conference of the Parties
- EU - European Union
- GFCM - General Fisheries Commission for the Mediterranean
- IAS - Invasive Alien Species
- IUU - Illegal, Unreported, and Unregulated (Fishing)
- MSFD - Marine Strategy Framework Directive
- NIS - Non-Indigenous Species
- SAP BIO - Strategic Action Programme for the Conservation of Biological Diversity in the Mediterranean Region
- SPA/RAC - Specially Protected Areas Regional Activity Centre
- UNEP-MAP - United Nations Environment Programme - Mediterranean Action Plan

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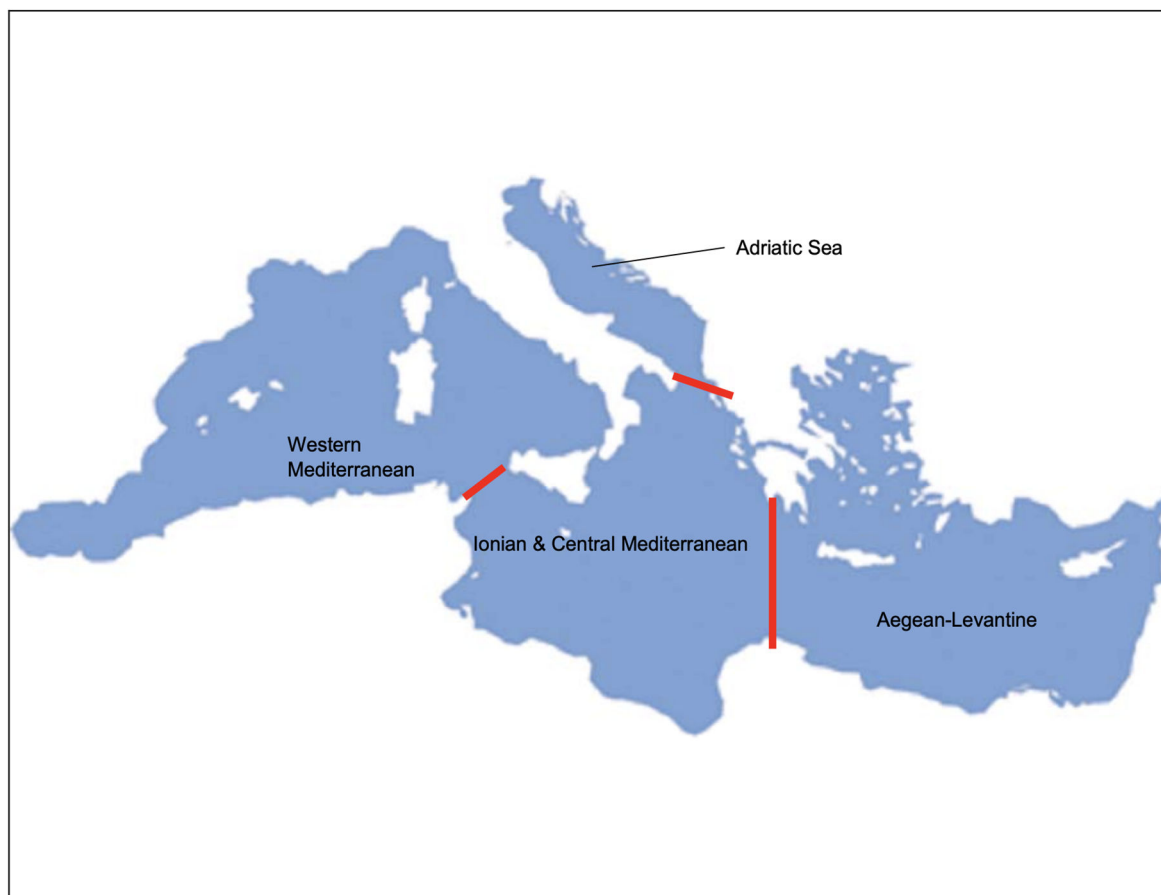
## 1. Introduction

The Post-2020 Strategic Action Programme for the Conservation of Biodiversity and Sustainable Management of Natural Resources in the Mediterranean Region (Post-2020 SAP BIO), adopted by the 22<sup>nd</sup> Conference of the Parties (CoP 22) (Decision IG 25/11), is the main strategic document aimed at preserving and restoring biodiversity across the region by 2030. Pursuant to the CoP 23 Decision IG.26/5, the Regional Activity Centre for Specially Protected Areas (SPA/RAC) is tasked with conducting a mid-term evaluation of the Post-2020 SAP BIO to assess the collective progress made by the Contracting Parties.

The main aims of the mid-term assessment for the Western Mediterranean Sea sub-region are:

- to understand the state/progress of the implementation of the Post-2020 SAP BIO (based on set targets and actions); notably the positive achievements, but even more so the gaps and setbacks encountered in the process, which require more attention and improvement
- to recommend steps/actions for improving the implementation of the Post 2020 SAP BIO in the next period up to 2030.

The **Western Mediterranean** basin covers an area of approximately 850,000 km<sup>2</sup>. It extends from the Strait of Gibraltar in the west to the Sicilian Channel in the east, separating it from the Eastern Mediterranean. This region includes the Alboran Sea, the Balearic Sea, the Ligurian Sea, the Tyrrhenian Sea (partially), and the Gulf of Lion. The basin is bordered by Spain, France, Monaco, Italy, Algeria, Tunisia, and Morocco. Spain's Mediterranean coastline stretches approximately 1,660 km, featuring major port cities like Barcelona and Valencia, with key economic sectors including tourism, fishing, and shipping. France's Mediterranean coast, known as the Côte d'Azur, extends about 600 km, with cities such as Marseille and Nice driving economies centered on tourism, maritime trade, and technology industries. Italy's western coastline along the Tyrrhenian Sea spans roughly 1,750 km, encompassing major ports like Genoa and Naples, and is characterized by industries such as shipbuilding, tourism, and agriculture. Monaco, a city-state along the French Riviera, has a coastline of 4.1 km and relies heavily on finance and tourism. Algeria's Mediterranean coast measuring approximately 1,622 km and Tunisia's around 1,148 km, both economies benefiting from oil and gas exports, agriculture, and tourism.



**Figure 1.** Sub-regions in the Mediterranean - Source: UNEP-MAP 2012

Coastal population densities vary significantly; for instance, Liguria in Italy has a density of about 300 inhabitants per km<sup>2</sup>, with urban centers like Genoa reaching nearly 500 inhabitants per km<sup>2</sup>. These coastal regions are vital economic hubs, with tourism playing a pivotal role. Other significant economic sectors include maritime trade, fishing, and energy production, with countries like Algeria focusing on oil and gas exports.

The Western Mediterranean basin serves as a habitat for various cetacean species. Notably, the fin whale (*Balaenoptera physalus*) maintains a significant resident population in the northern sector. Another prevalent species is the striped dolphin (*Stenella coeruleoalba*). Despite its oligotrophic status, the western Mediterranean supports diverse marine ecosystems, including extensive *Posidonia oceanica* seagrass meadows. These underwater habitats are vital for biodiversity, providing shelter and feeding grounds for numerous marine species. Additionally, the region is home to unique coralligenous communities which harbor a significant proportion of Mediterranean marine life.

The primary maritime current in the region is the North Atlantic Current, which influences the flow of water into the basin. Within the basin, the Mediterranean Outflow Water flows out of the Strait of Gibraltar, while significant currents include the Ligurian Current and the Alboran Sea currents, which are influenced by topography and seasonal variations. Notable underwater topographies include the large canyons such as the Cartagena Canyon and the Bonifacio Canyon.

## 2. Methodology

This mid-term assessment focuses on evaluating the progress of implementing 20 nationally scoped actions outlined in Annex III of the Post-2020 SAP-BIO. Specifically, it examines the initiation of activities scheduled for completion by 2025.

The assessment is primarily based on responses from countries through a customized, simplified questionnaire. This questionnaire consisted of binary questions supported by means of verification, along with targeted inquiries to identify gaps and challenges encountered in the implementation process. Countries were given a predefined set of responses to indicate implementation progress, as well as those related to specific challenges. Additionally, for certain actions, multiple questions were included to ensure a more comprehensive evaluation.

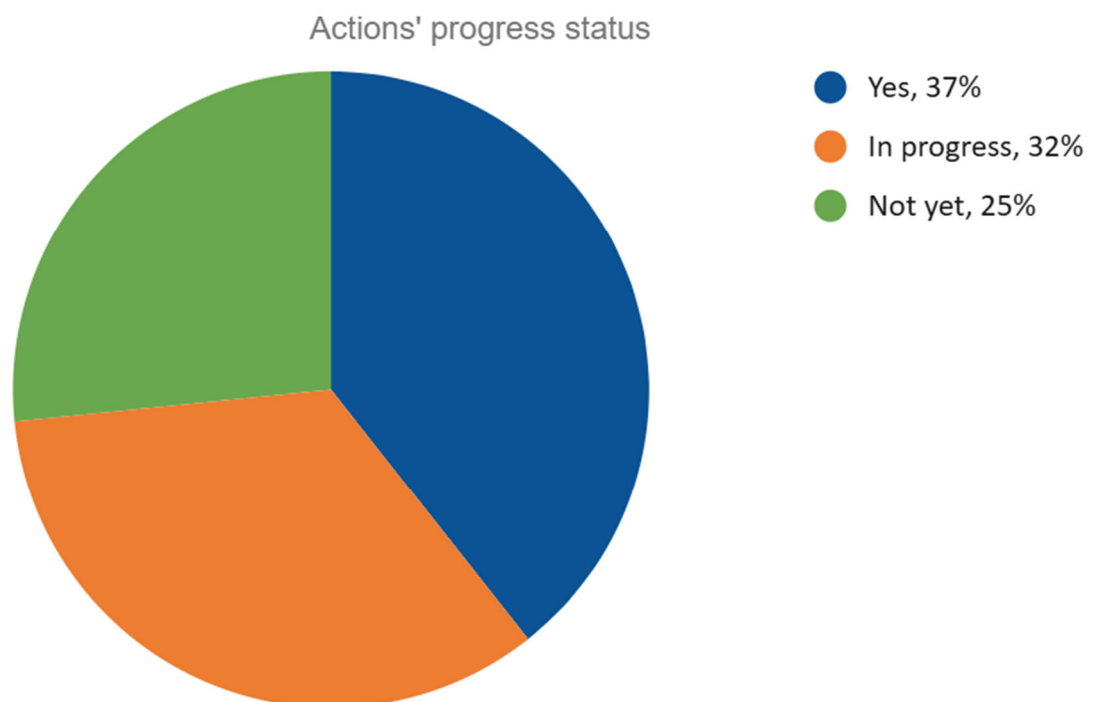
This methodology enables countries to perform self-assessments and provide indicative updates on the progress of actions in a relatively efficient manner. However, it also presents some limitations, chiefly its subjectivity. For instance, the questionnaire does not quantify the meaning of pre-selected response options (e.g., what qualifies as sufficient progress for an action to be marked as 'yes'), which allows room for interpretation among different countries. This is mainly due to the absence of measurable indicators for the planned actions in the Post-2020 SAP-BIO Annex III. Nevertheless, the gathered data offers valuable insights into both advancements and obstacles in implementation, helping to identify areas of improvement and propose recommendations for enhanced execution.

In early February 2025, SPA/RAC distributed the online questionnaire to the Barcelona Convention Focal Points, including those from all Western Mediterranean countries, with a response deadline of 17 days. Responses were received from Spain, France, Tunisia and Italy; data gaps remain: Algeria, Morocco and Monaco. Data from specific countries is still pending and has therefore not been included in this analysis.

### 3. Mid-term Post 2020 SAP-BIO implementation progress

#### 3.1. Actions implementation progress

Western Mediterranean countries reported that the majority of actions were achieved (37%) or are still in progress (32%). On the other hand, 25% of the actions have not yet started (**Figure 2**). Such progress is also measured at the level of specific goals, with no particular goal standing out.



**Figure 2.** Overview of implementation progress for nationally relevant Post-2020 SAP BIO actions in the Western Mediterranean sub-region



A more in-depth analysis at the level of individual goals, shows that the most significant progress under **Goal 1 - Reduce the threats to biodiversity** is done in NIS/IAS control (Action 6), followed ex æquo by NIS/IAS commitment (Action 4), Spatial planning (Action 11) and Restoration actions (Action 12). No progress has been made in Species recovery (Action 2). Refer to **Figure 3**.

Some countries have provided means of verification (examples) of specific positive efforts undertaken within particular actions. Regarding **Species recovery, (Action 2)** :

- France: the capture and intentional killing of marine mammals is prohibited by a decree of 1 July 2011, and that of sea turtles by a decree of 10 November 2022. These two decrees respectively establish the list of marine mammals and sea turtles protected by France and the terms of their protection. However, the ban on deliberate capture does not apply to accidental capture in fishing gear.
- Italy: has finalised in 2021 the drafting of its National Biodiversity Strategy to 2030, prepared with reference to the following strategic objectives: A) To build a coherent network of terrestrial and marine protected areas, and B) Restoring terrestrial and marine ecosystems.

For **NIS/IAS commitments (Action 4)**, two countries (France and Italy) referred to adoption of specific measures under the Marine Strategy Framework Directive – MSFD (Directive 2008/56/EC), while Tunisia has specific regulatory framework ruled by the Office of the Merchant Navy and Ports.

Furthermore, for **NIS/IAS capacity (Action 5)** one country (France) reported positive progress in conducting specific studies on NIS, e.g. the blue crab *Callinectes sapidus*, the Asian clam *Arcuatula senhousia* and the Asian gastropod *Rapana venosa*.

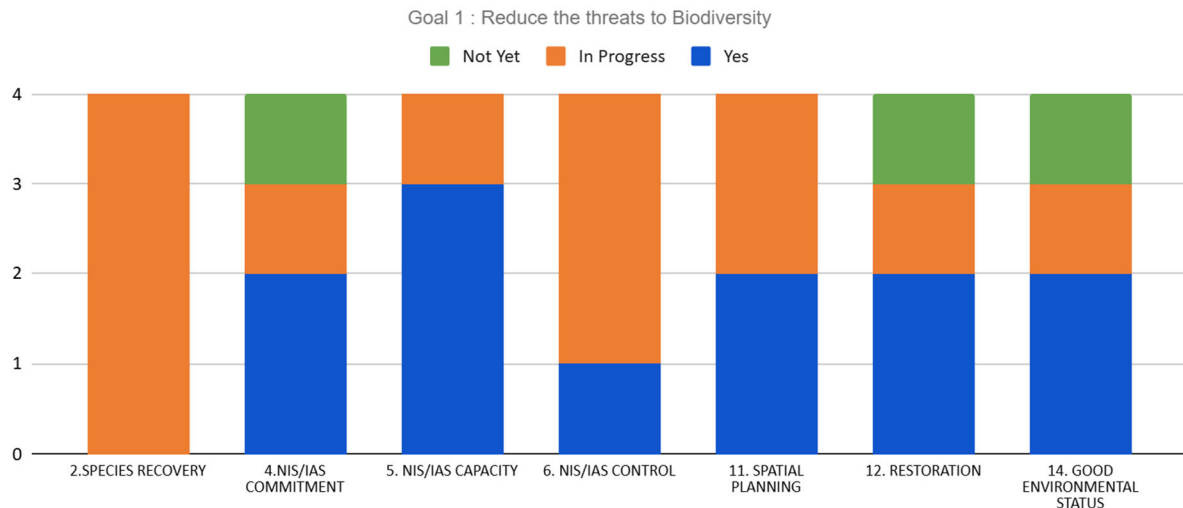
Regarding the **control of NIS/IAS (Action 6)**, no specific information was provided, but we can expect the monitoring of NIS/IAS in EU countries according to the requirements of the MSFD.

**Spatial planning action (Action 11)** is either implemented or “in progress”:

- Italy approved in 2024 its Maritime Space Management Plan.
- In France, the strategic *façade* documents are planning instruments that ensure the implementation of EU directives. They include an assessment of the baseline status of marine waters, objectives and actions to guide efforts and reduce pressures associated with human activities. These documents also include maps by utilisation zones to illustrate the issues, set priorities and identify potential conflicts of use. The new generation of strategic *façade* documents, which is currently being updated, will also include a development pathway for strong protection at sea.

**Restoration (Action 12)** has been reported by three countries: these activities are in progress in Spain, while Italy and Tunisia have implemented the inventory of ecosystems with the highest ecological relevance. France has not launched such an inventory: their point is that all marine ecosystems are intended to be restored and all are of major interest; however, some can be actively and more rapidly restored (such as seagrass beds or macroalgae forests), while soft sediments undergo a very slow process of formation.

Three countries (Spain, Italy and Tunisia) are making efforts in relation to **Good Environmental Status (Action 14)**. France has not yet started scientific research on trophic networks and the general functioning of ecosystems to consolidate the scientific basis for the assessment of good environmental status, although EU Member States are encouraged to start these efforts in order to fulfil the requirements of the MSFD.



**Figure 3.** Overview of implementation progress for nationally relevant Post-2020 SAP BIO actions in the Western Mediterranean sub-region: **Goal 1.**

As for **Goal 2 - Ensure that biodiversity is preserved and maintained or enhanced in order to meet people's needs**, the greatest progress has been made in research projects on marine invertebrates: Action 17 is implemented in all the countries that responded to the Questionnaire. Implementation of other Actions shows equally positive progress, with the least positive progresses reported in Overfishing and IUU (Action 21, implemented in one case only) and Habitats (Action 19, not started yet in 2 cases). Refer to **Figure 4.**

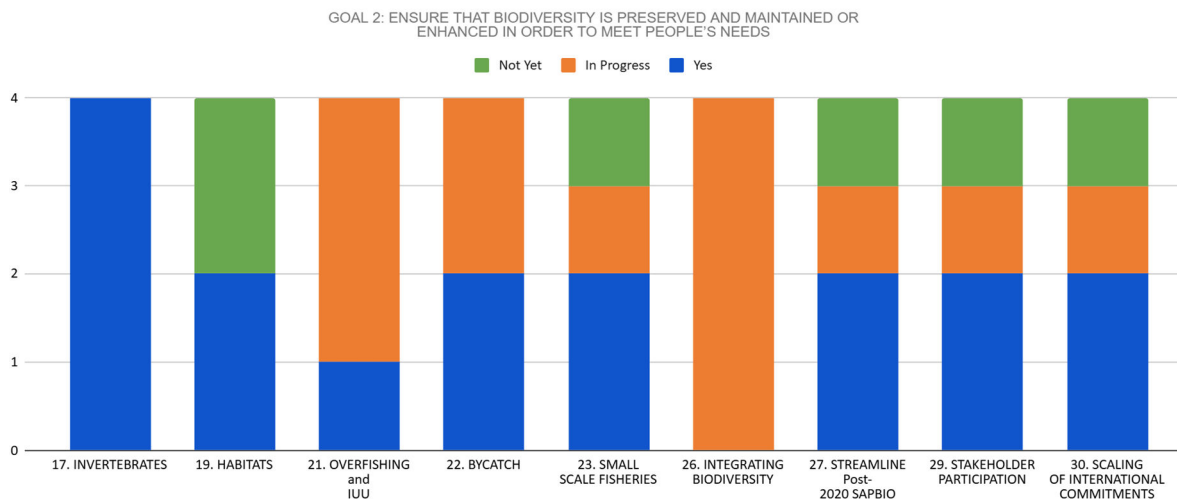
Only France provided few means of verification (examples) of specific positive efforts undertaken within particular actions:

- Regarding **Invertebrates (Action 17)**, national legislation is covering this topic, i.e. Article L411-1 of the French Environment Code.
- Concerning **Key Habitats (Action 19)**, there is mapping for Posidonia, coralligenous and seagrass beds. For deep-sea habitats and caves, mapping is only partially available. The difficulties lie in financial resources in view of the high costs of data collection at sea and in the technical capacities in view of the scale of the habitats to be inventoried. Moreover, the latter are not assessed as part of the MSFD.
- For **Integrating biodiversity (Action 26)**, France reported that the National Biodiversity Strategy and the EU Nature Restoration Regulation already take into account the theme of reducing harmful incentives to the protection and restoration of biodiversity and ecosystem.

Concerning **actions related to fisheries (Actions 21, 22 and 23)**, France relies on EU regulations for identifying any subsidies that contribute to overcapacity and overfishing (**Action 21, Overfishing and IUU**): Article 22 of Regulation (EU) No 1380/2013 on the Common Fisheries Policy requires Member States to submit an annual report to the Commission on the balance between the fishing capacity of their fleet and fishing opportunities. They also recall the GFCM's 2018 regional action plan for small-scale fisheries in the Mediterranean and Black Sea to respond - in part - to **Action 23 (Fisheries co-management and prevention of illegal practises)**: France is implementing a national control plan to combat illegal fishing.

**Action 22 (Bycatch)** is well implemented by France. Regarding data collection and the assessment of the impact of bycatch on non-target species, France has adopted regulations requiring the reporting of incidental catches of marine Mammals and sea Turtles. In addition, they run an on-board observation programme ('ObsMer') to collect scientific data on all commercial catches or by-catches, including incidental catches by towed and static gear. This programme is complemented by work under the

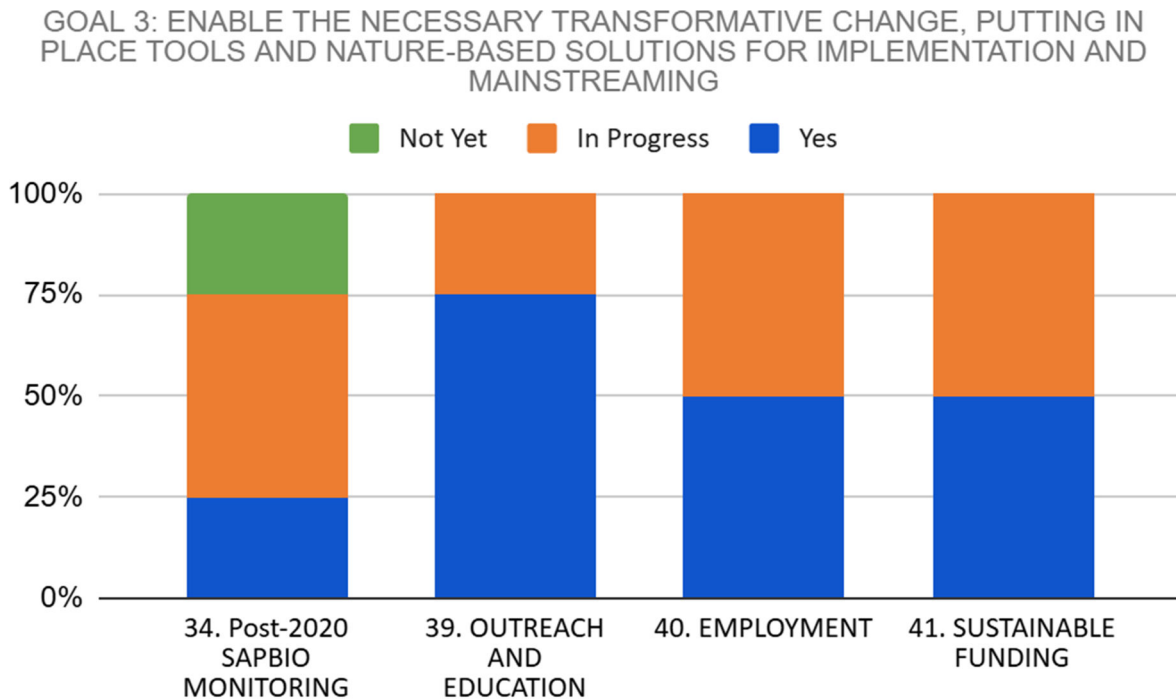
Fisheries Risk Assessments (*Analyses Risques-Pêche, ARP*), which allows decisions to be made on the level of risk of undermining the conservation objectives of protected species in Natura 2000 sites. Thus, if it is determined that the interactions pose a high or moderate risk of compromising the conservation objectives of a species, a regulatory measure is introduced to reduce this risk to low or no risk. Technical measures to reduce accidental catches are being tested in two national projects. For the most endangered species, in particular those listed in Appendix II of the Barcelona Convention, the French authorities have undertaken to transpose the strict protection of these species into national law (if this is not already the case, as for the Elasmobranchs). The means of data collection are included in the national data collection work plan.



**Figure 4.** Overview of implementation progress for nationally relevant Post-2020 SAP BIO actions in the Western Mediterranean sub-region: **Goal 2**

Regarding **Goal 3– Enable the necessary transformative change, putting in place tools and nature-based solutions for implementation and mainstreaming**, the most significant progress has been made in Outreach and Education (Action 39) and the least progress is reported for Employment (Action 34). Refer to **Figure 5**.

All countries reported about the progress of relevant Goal 3 actions, but they have not provided concrete means of verification. Only France mentions the Measure 37 of its National Biodiversity Strategy: it partially fulfils the ‘sustainable financing’ objective of Post2020 SAP BIO (**Action 41, Sustainable Funding**).

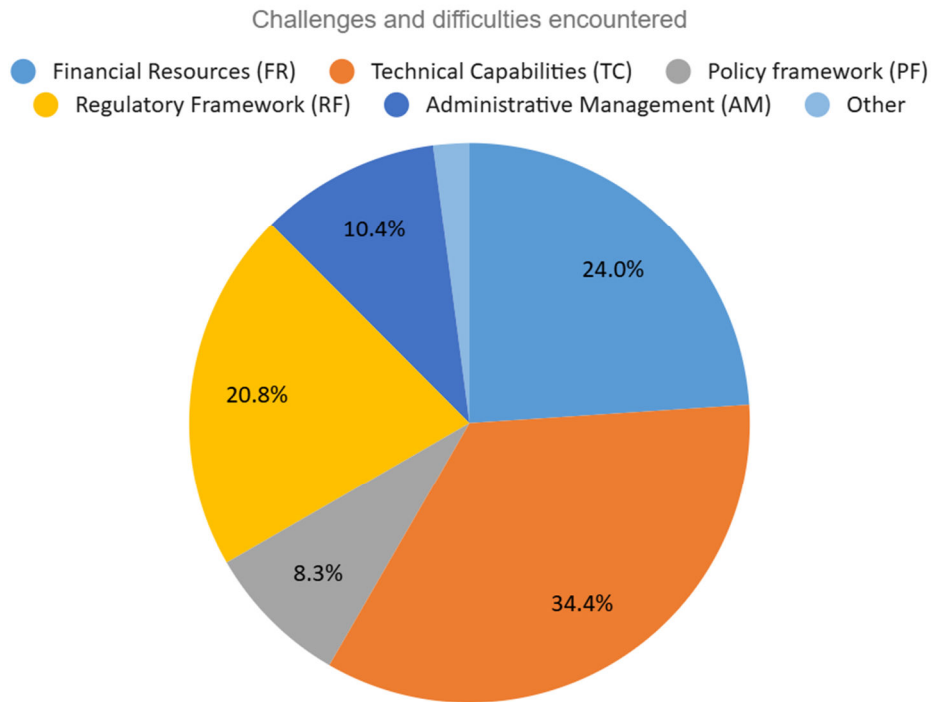


**Figure 5.** Overview of implementation progress for nationally relevant Post-2020 SAP BIO actions in the Western Mediterranean sub-region: **Goal 3.**

### 3.2. Challenges

Overall, the majority of Western Mediterranean countries reported challenges mainly related to limited Technical Capabilities (34.4%), followed by Financial Resources (24.0%), Regulatory Framework (20.8%), Administrative Management (10.4%) and Policy framework (8.3%).

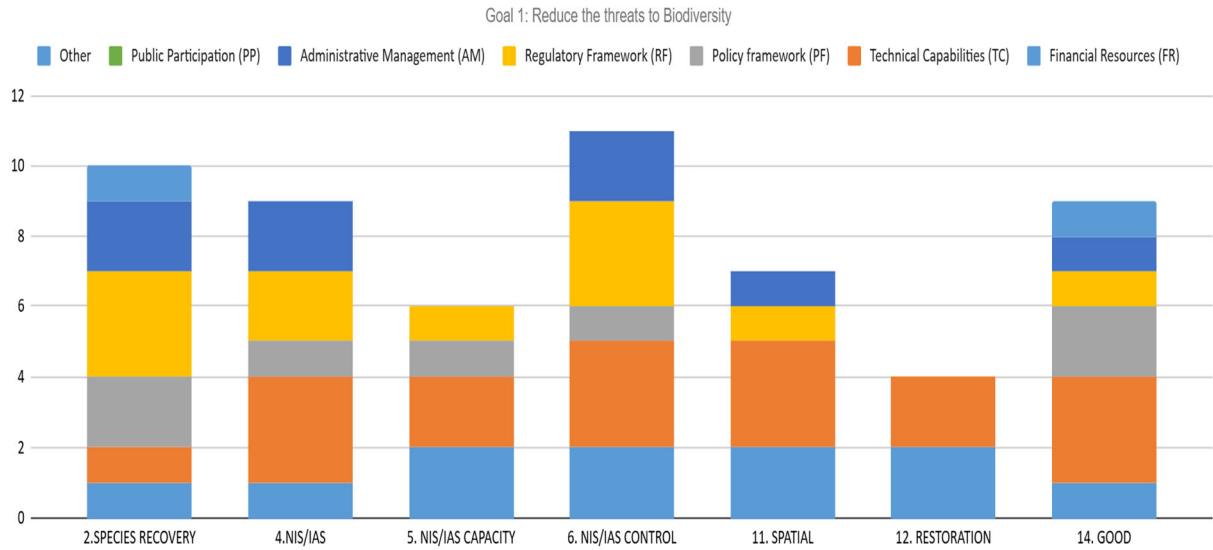
Neither Gender Disparities nor Public Participation problems were reported. In fact, in excess of the proposed options, additional challenges have been reported for **Action 2 - Species Recovery** (Regulatory framework: Conflict of use with fishing activities) and **Action 14 - Good Environmental Status** (Technical capabilities: Research into food webs is not a priority of the EU MSFD). Refer to **Figure 6.**



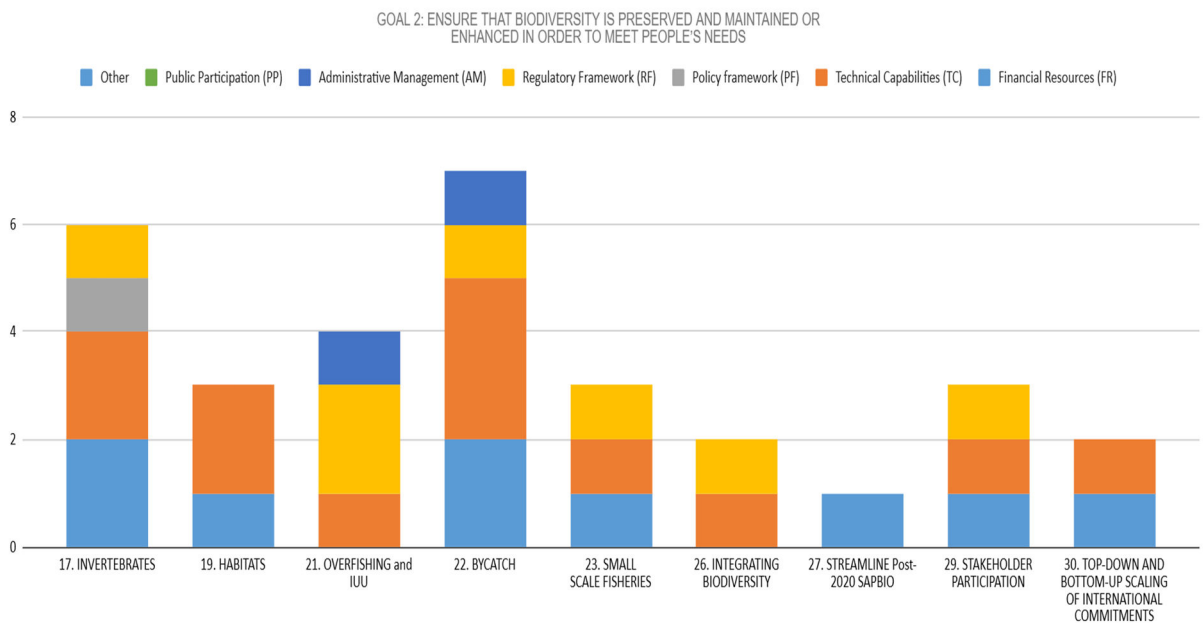
**Figure 6.** Overview of challenges and difficulties encountered in implementing nationally relevant Post-2020 SAP BIO actions in the Western Mediterranean sub-region

In principle, these results correspond to those observed of all three individual goals, with slight variations in the order of significance for each goal. For example:

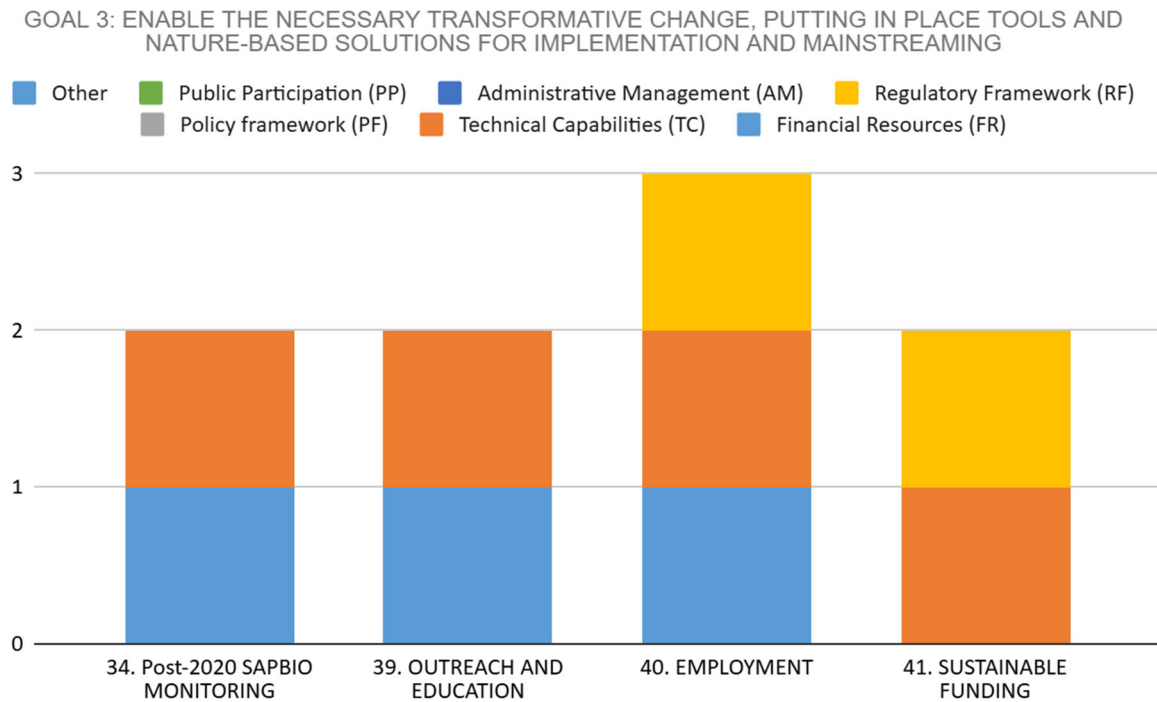
- **Goal 1.** The major challenges are limited Technical Capabilities (30.36%), then Financial Resources and Regulatory Framework (ex aequo 19.64%). No issues were reported with gender disparities and public participation (**Figure 7**).
- **Goal 2.** The main challenges identified are limited Technical Capabilities (38.71%), then Financial Resources (29.03%) and Regulatory Framework (22.58%). Lack of Public Participation remains irrelevant (**Figure 8**).
- **Goal 3.** The primary challenge is lack of adequate Technical Capabilities (44.44%), followed by the previously mentioned issues of limited Financial Resources (33.33%) and Regulatory Framework (22.22%). As in Goals 1 and 2, no problems were reported with public participation (**Figure 9**).



**Figure 7.** Overview of challenges and difficulties encountered in implementing nationally relevant Post-2020 SAP BIO actions in the Western Mediterranean sub-region under **Goal 1**



**Figure 8.** Overview of challenges and difficulties encountered in implementing nationally relevant Post-2020 SAP BIO actions in the Western Mediterranean sub-region under **Goal 2**



**Figure 9.** Overview of challenges and difficulties encountered in implementing nationally relevant Post-2020 SAP BIO actions in the Western Mediterranean sub-region under **Goal 3**

## 4. Conclusions and Recommendations

### 4.1. Conclusions

Based on these results, several key conclusions can be drawn:

- **Overall Progress:** The assessment reveals that a significant portion of nationally relevant Post-2020 SAP BIO actions in the Western Mediterranean are either achieved (37%) or in progress (32%), indicating a positive initial momentum towards the programme's goals. However, 25% of actions have not yet started, highlighting areas requiring immediate attention.
- **Goal 1: Reduce the threats to Biodiversity:** The most significant progress under Goal 1 has been noted in NIS/IAS control (Action 6), NIS/IAS commitment (Action 4), Spatial planning (Action 11), and Restoration actions (Action 12). Conversely, no progress has been reported in Species recovery (Action 2). The primary challenges encountered for this goal are limited Technical Capabilities (30.36%), followed by Financial Resources and Regulatory Framework (both at 19.64%). Notably, issues with public participation and gender disparities were not reported as significant challenges under Goal 1.
- **Goal 2: Ensure that biodiversity is preserved and maintained or enhanced:** The greatest progress under Goal 2 has been made in research projects on marine invertebrates (Action 17), which is reported as implemented in all responding countries. Other actions show generally positive progress, although Overfishing and IUU (Action 21) and Habitats (Action 19) reported the least positive progress. The main challenges for Goal 2 are limited Technical Capabilities (38.71%), Financial Resources (29.03%), and Regulatory Framework (22.58%). Similar to Goal 1, a lack of public participation was not identified as a relevant challenge.
- **Goal 3: Enable the necessary transformative change:** The most significant progress for Goal 3 has been in Outreach and Education (Action 39), while the least progress is reported for Employment (Action 40). Overall, for this goal, the primary challenge identified is the lack of adequate Technical Capabilities (44.44%), followed by limited Financial Resources (33.33%) and Regulatory Framework (22.22%). Public participation was also not reported as a problem under Goal 3.
- **Overarching Challenges:** Across all three goals, the most frequently reported challenges are limited Technical Capabilities (34.4%) and Financial Resources (24.0%), followed by issues with the Regulatory Framework (20.8%). Administrative Management (10.4%) and Policy framework (8.3%) were also noted as challenges. Interestingly, neither Gender Disparities nor Public Participation were reported as significant impediments to implementation across the sub-region.
- **Data Limitations and Gaps:** While all four participating countries (Spain, Italy, France, Tunisia) provided responses for all listed actions in the questionnaire, significant gaps in the level of detail and comprehensiveness exist. Notably, for Action 23 (Small Scale Fisheries), all responding countries indicated "Not Yet" for both parts without providing further explanation or means of verification. Furthermore, the subjective nature of the questionnaire and the lack of quantifiable indicators may have resulted in varying interpretations of progress. A crucial limitation is the absence of responses from Algeria, Morocco and Monaco, which means the assessment is based on an incomplete representation of the Western Mediterranean sub-region.

In conclusion, the mid-term assessment of the Post-2020 SAPBIO implementation in the Western Mediterranean sub-region indicates initial progress across various actions, with notable advancements in areas like NIS/IAS control, spatial planning, restoration, and research on marine invertebrates. However, significant challenges - particularly related to technical capabilities and financial resources - persist across all goals. Furthermore, the lack of detailed information for certain actions and the absence of data from three countries represent key limitations of this assessment. Moving forward, targeted efforts to address the identified challenges, encourage more detailed reporting, and ensure broader participation in future evaluations will be crucial for achieving the Post-2020 SAP BIO objectives in the Western Mediterranean by 2030.



## 4.2. Recommendations

It is encouraging to note that all four participating countries (Spain, Italy, France, and Tunisia) successfully provided a response for each of the nationally relevant Post-2020 SAP BIO actions. This comprehensive initial engagement provides a valuable basis for understanding the sub-region's progress.

Looking ahead, the areas where responses could be further enriched shows clear pathways for future action:

- **To better understand the 'Not Yet' answers.** The fact that all the countries that participated said 'Not Yet' for Action 23 (Small Scale Fisheries) in both parts of the evaluation indicates that this is a challenge for the whole sub-region. This provides a chance to actively work with these countries to find out in detail what is stopping them from starting action.
- **To compensate for the missing information from countries that did not respond.** The fact that some countries did not send their responses is a key area where efforts should be focused in the future. Actively encouraging these countries to participate in the next evaluations will be very important to get a picture of how the Western Mediterranean is doing in reaching the Post-2020 SAP BIO goals.
- **Capitalising on ongoing consultations.** The indication that some countries were undergoing consultations regarding fisheries and NIS/IAS commitments suggests that further, more detailed information is potentially forthcoming. Continued dialogue and support for these consultations can help to ensure that the final assessment benefits from the most comprehensive and nuanced information available for these important action areas.

The current assessment provides a strong initial overview, and the identified areas for enhanced detail and broader participation offer clear and actionable steps towards a more complete and ultimately more effective implementation of the Post-2020 SAP BIO in the Western Mediterranean.

This set of considerations lead us to suggest:

- Specific Recommendations for Goals:
  - Goal 1: to focus on capacity-building initiatives in specific areas like NIS/IAS control or species recovery.
  - Goal 2: to address the limited progress in "Overfishing and IUU", focus on strengthening monitoring and enforcement in fisheries.
- Address "Not Yet" Actions. The fact that "Small Scale Fisheries" (Action 23) was marked as "Not Yet" by all responding countries without further explanation is an important point. We recommend further investigation into the barriers preventing the implementation of this action and propose targeted support to overcome these.
- Encourage Participation. Given the data gaps due to non-response of Algeria, Morocco, and Monaco, we recommend that these countries are actively involved in future assessments to gain a comprehensive regional understanding.

**Ionian Sea-Central Mediterranean Sea Sub-region report**

## List of Acronyms/Abbreviations

<b>CoP</b>	Conference of the Parties
<b>EcAp</b>	Ecosystem Approach
<b>EU</b>	European Union
<b>GES</b>	Good Environmental Status
<b>IAS</b>	Invasive Alien Species
<b>IMAP</b>	Integrated Monitoring and Assessment Programme
<b>IUU</b>	Illegal, Unreported, and Unregulated (Fishing)
<b>MAP</b>	Mediterranean Action Plan
<b>MSFD</b>	Marine Strategy Framework Directive
<b>NIS</b>	Non-Indigenous Species
<b>SPA/RAC</b>	Specially Protected Areas Regional Activity Centre Strategic Action Programme for the Conservation of Biological Diversity in the
<b>SAP BIO</b>	Mediterranean Region
<b>UNEP</b>	United Nations Environment Programme

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## 1. Introduction

The Post-2020 Strategic Action Programme for the Conservation of Biodiversity and Sustainable Management of Natural Resources in the Mediterranean Region (Post-2020 SAPBIO), adopted under Decision IG.25/11 by the 22nd Conference of the Parties (CoP22) to the Barcelona Convention, establishes a regional framework to safeguard and restore Mediterranean biodiversity by 2030. Aligned with the Protocol concerning Specially Protected Areas and Biological Diversity (SPA/BD Protocol), this programme outlines three overarching goals: reducing threats to biodiversity (Goal 1), ensuring biodiversity preservation to meet societal needs (Goal 2), and enabling transformative change through collaborative solutions (Goal 3). These goals are operationalized through 42 priority actions spanning species recovery, maritime traffic management, climate resilience, stakeholder participation, and capacity-building initiatives, among others.

Following the issue of Decision IG.26/5 adopted at CoP23, the Specially Protected Areas Regional Activity Centre (SPA/RAC) is mandated to conduct a mid-term evaluation of the Post-2020 SAPBIO to assess progress toward its 2025, 2027, and 2030 targets. This assessment employs a standardized methodology, integrating quantitative and qualitative indicators from Annex III of the SAPBIO, to evaluate implementation status, identify achievements, and address gaps across Mediterranean sub-regions.

Focusing on the Ionian Sea and Central Mediterranean sub-region (encompassing Greece, Italy, Libya, Malta, and Tunisia), the mid-term assessment aims to:

- **Analyse Progress:** Evaluate the current status of SAPBIO implementation against 2025 benchmarks, with emphasis on region-specific challenges such as marine spatial planning, invasive species control, and sustainable fisheries.
- **Identify Gaps:** Highlight systemic and contextual barriers hindering progress toward 2027 and 2030 targets, including governance coordination, resource allocation, and stakeholder engagement.
- **Provide Strategic Recommendations:** Propose actionable measures to accelerate progress, ensuring alignment with the SAPBIO's objectives and the Mediterranean's Ecological Approach (ECAP/IMAP).

The evaluation leverages a participatory approach, engaging Contracting Parties, SAPBIO National Correspondents, and regional stakeholders through data collection, technical meetings, and sub-regional reporting. Outcomes will inform adaptive management strategies and policy refinements, ultimately contributing to the 17<sup>th</sup> SPA/BD National Focal Points Meeting and reinforcing the Mediterranean's commitment to achieving global biodiversity targets by 2030.

The Ionian Sea and Central Mediterranean sub-region encompass a vital maritime zone stretching from the southern Italian Peninsula and Sicily to the western coasts of Greece and northern Africa, including Libya, Malta, and Tunisia (Figure 1). This sub-region serves as a critical ecological and geopolitical junction, linking the Adriatic, Tyrrhenian, and Levantine basins. It is bordered by five countries: Greece, Italy, Libya, Malta, and Tunisia. Among these, Greece, Italy, and Malta are European Union (EU) Member States, while Libya and Tunisia are non-EU Mediterranean partners.

Ecologically, the sub-region hosts unique marine habitats, including deep-sea trenches, seagrass meadows, and biodiversity hotspots, many of which are designated under the Barcelona Convention's Specially Protected Areas (SPAs). Economically, it supports key sectors such as maritime transport, tourism, and fisheries, with major shipping routes traversing its waters and coastal economies relying heavily on marine resources. However, the region faces pressing challenges, including invasive species proliferation (e.g., Non-Indigenous Species/Invasive Alien Species, NIS/IAS), climate change impacts on coastal ecosystems, and pressures from unsustainable fishing and coastal development.

Aligned with the Post-2020 SAPBIO's goals, the sub-region's conservation priorities include enhancing Marine Coastal Protected Areas (MCPAs), improving spatial planning to balance

ecological and economic needs, and strengthening regional cooperation to address transboundary issues such as pollution and habitat degradation. The mid-term assessment will evaluate progress toward these targets, leveraging indicators from Annex III of the SAPBIO, while addressing gaps in governance, stakeholder engagement, and resource allocation to ensure the 2030 objectives are met. This assessment is prepared for SPA/RAC by Abdulmaula Hamza, as selected expert for the Ionic Sea-Central Mediterranean Sea sub-region for the Mid-term assessment for SAPBIO in this sub-region.



Figure 1. Map of the Mediterranean Sea indicating the extent of the Ionian Sea-Central Mediterranean Sea subregion (in green). Modified from:

<https://marineregions.org/gazetteer.php?p=details&id=50156> )

## 2. Methodology

This mid-term assessment evaluates the implementation progress of 42 regionally and nationally scoped actions outlined in Annex III of the Post-2020 SAPBIO, with a focus on start-up activities initiated by 2025. The analysis focuses on the Ionian Sea and Central Mediterranean sub-region (Greece, Italy, Libya, Malta, and Tunisia) and employs a structured methodology to assess advancements toward the programme's 2025, 2027, and 2030 targets.

The assessment relies on responses to a standardized questionnaire developed by SPA/RAC and sub-regional experts, distributed to Barcelona Convention Contracting Parties. The questionnaire combines binary questions (e.g., "Has the action been initiated?") with open-ended queries to identify challenges, gaps, and contextual barriers. For certain actions, multiple questions were posed to capture nuanced progress (e.g., governance coordination under Target 28 or invasive species management under Targets 4–6). Countries selected responses from predefined options in the simplified table (see annex 1) and provided when available supporting evidence, such as policy drafts, monitoring reports, or stakeholder engagement records.

While this approach enables rapid self-assessment by Contracting Parties, it carries inherent limitations. The absence of quantifiable indicators for many SAPBIO actions in Annex III introduces subjectivity, as interpretations of progress (e.g., what constitutes "sufficient" implementation) may vary across countries. Additionally, the reliance on self-reported data risks overlooking discrepancies between stated progress and on-ground realities. Despite these constraints, the collected data offers critical insights into trends, achievements, and systemic bottlenecks, forming a baseline for adaptive management.

In February 2025, SPA/RAC circulated the questionnaire to all Ionian-Central Mediterranean sub-region countries via Barcelona Convention Focal Points, allowing a 17-day response window. As of the draft report compilation date (24 March 2025), **feedback was received from all countries in the sub-region, except for Greece**. No responses were submitted by Greece, Malta, or Tunisia, limiting the sub-regional analysis to available data. Gaps in participation underscore challenges in stakeholder engagement and highlight the need for enhanced coordination mechanisms to ensure comprehensive reporting in future assessments.

The findings inform actionable recommendations to accelerate SAPBIO implementation, prioritizing governance reforms, capacity-building, and regional collaboration to address transboundary challenges such as invasive species, habitat degradation, and uneven policy enforcement.

## 3. Mid-term Post 2020 SAP-BIO implementation progress

### 3.1. Actions implementation progress

The Ionian Sea and Central Mediterranean sub-region, through responses of its countries (except Greece where no response was received- 24 March 2025), presents a contrasting picture of Post-2020 SAPBIO implementation. A comprehensive review of Post-2020 SAP BIO action implementation indicates a generally positive trend, with room for improvement. A substantial majority of actions (64.52%) have been successfully implemented or have reached a stage of significant progress across the assessed nations. Ongoing efforts are evident in 23.39% of the actions, classified as "In Progress," reflecting a continued commitment to achieving the SAP BIO targets. However, a notable proportion (12.10%) of actions remain uninitiated ("Not Yet"), representing a key area for future focus and resource allocation to ensure comprehensive regional adherence to the Post-2020 SAP BIO framework.

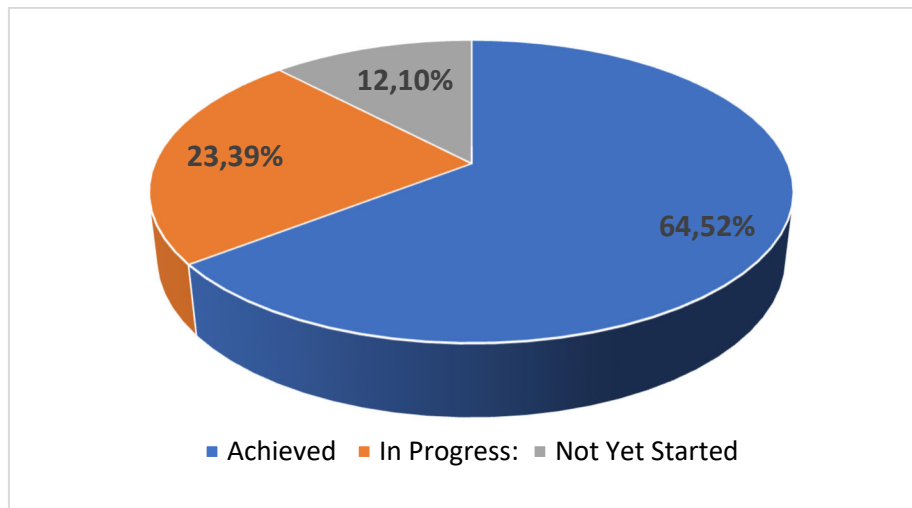


Figure 2. Overview of implementation progress for nationally relevant Post-2020 SAP BIO actions in the Ionian Sea and Central Mediterranean sub-region.

A deeper look on the country-by-country progress of Post-2020 SAP BIO action implementation within the Ionian Sea and Central Mediterranean sub-region reveals considerable variation in progress among the four nations assessed (Figure 2). Malta demonstrates the most advanced implementation, with 83.87% of actions completed, closely followed by Italy at 77.42%. Tunisia also exhibits a strong performance, having completed 70.97% of the assessed actions. In contrast, Libya's progress is significantly lower, with only 25.81% of actions completed and a substantial proportion (38.71%) yet to be initiated. This disparity highlights a need for targeted support and capacity-building initiatives to enhance Libya's implementation of the SAP BIO actions, ensuring a more uniform level of environmental protection and biodiversity conservation across the region.

### Goal 1: Reduce the threats to biodiversity:

A highly variable landscape emerges in implementation of this goal in the sub-region. While certain areas demonstrate an encouraging degree of regional commitment and concerted action, others reveal significant disparities in capacity, resources, and prioritization (Figure 3). The development of recovery plans for species vulnerable to unintentional killing or capture (Action 2.1), for instance, is largely characterized as "In Progress" across the region (Libya, Italy, and Tunisia), indicating a shared recognition of the issue. Malta, however, stands out with a reported completion ("Yes"), suggesting a more advanced stage of implementation. This general awareness, however, often translates to concrete, fully implemented plans still being under development in most contexts. A contrasting picture of regional strength emerges when considering actions to *combat invasive species*. Here, a concerted effort is clearly visible. All four nations report affirmative progress ("Yes") in incorporating the IMO Ballast Water Management Convention into their national legal frameworks (Action 4.1) and in initiating baseline studies on non-indigenous species (NIS/IAS) (Action 5.1).

This uniform commitment underscores the shared understanding of invasive species as a major, transboundary threat to marine biodiversity. However, a subtle yet important deviation arises in the monitoring of NIS at key entry points, such as ports (Action 6.2), where Tunisia reports a "Not Yet" status, potentially creating a vulnerability in the regional biosecurity network. The identification of vulnerable areas and priority sites for mitigation action (Action 6.1) also enjoys widespread progress, with Libya, Italy, and Malta reporting completion ("Yes") and Tunisia actively engaged ("In Progress"). This suggests a strong regional grasp of the spatial distribution of threats and the corresponding need for targeted conservation interventions. Progress in developing indicators for maritime and coastal spatial plans (Action 11.1) is, however, far more uneven. Italy and Malta report success ("Yes"), Tunisia is actively working towards this goal ("In Progress"), while Libya has not yet initiated action ("Not Yet").

This disparity highlights significant differences in national capacities for integrated coastal zone management, a crucial element for long-term biodiversity protection. Efforts to compile comprehensive ecosystem inventories (Action 12.1), cataloguing ecologically significant habitats, are largely underway, with all except Malta reporting success. Similarly, studies of trophic networks are being conducted by three out of the four nations.

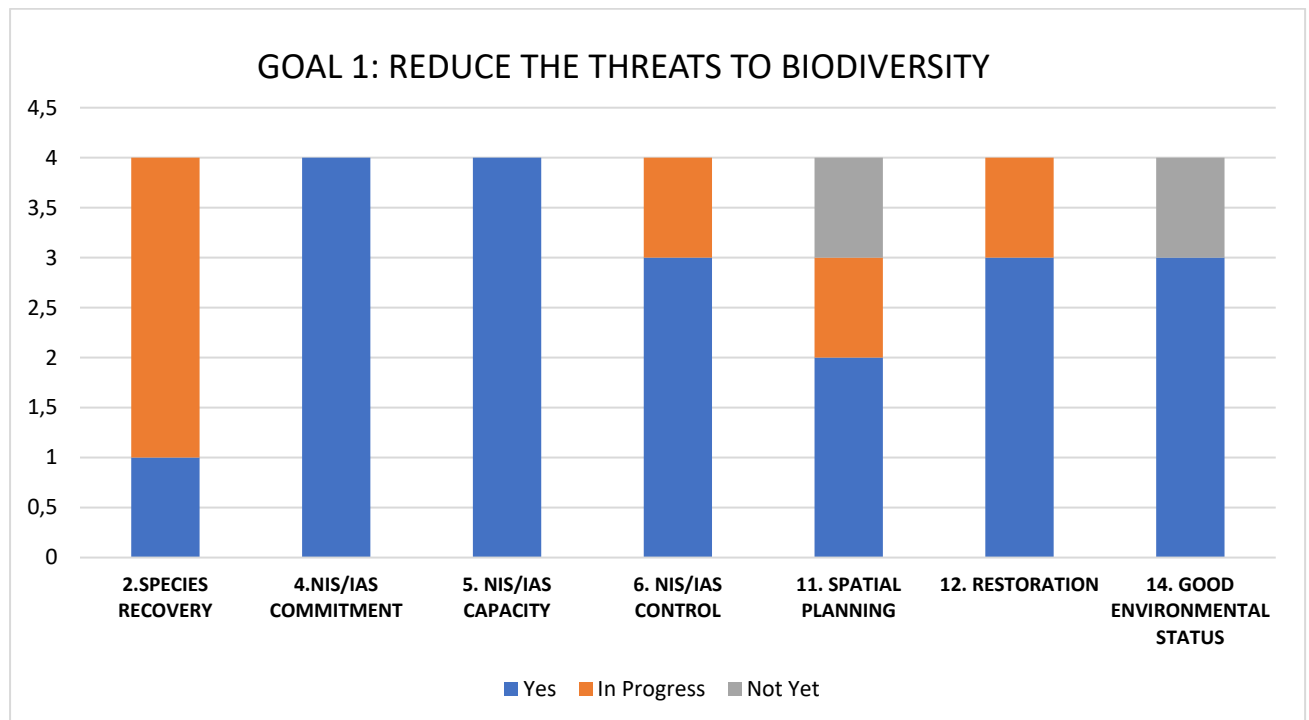


Figure 3. Overview of Goal 1 implementation progress for nationally relevant Post-2020 SAP BIO actions in the Sea sub-region.

### The "Means of Verification" provided for Goal 1

Reported actions by the two nations reveal a complex interplay of progress, ongoing efforts, and significant gaps, for species recovery (Action 2.1), Libya's verification highlights initial engagement, mentioning ongoing contacts with the Fisheries Ministry. Italy, in contrast, points to its overarching National Biodiversity Strategy, a high-level policy document, while Malta cites specific legislation, the Flora and Fauna Habitats Protection Regulation, which directly prohibits harm to protected species. Tunisia also reports initial engagement with relevant ministries. This spectrum – from preliminary discussions to established legal frameworks – underscores the diverse approaches and stages of implementation. In the realm of invasive species (Actions 4.1, 5.1, 6.2), Libya provides a blend of legal references (specific articles of law) and project-based activities (mentioning studies conducted under the IMAP-MPA and EcAp initiatives). Italy primarily relies on alignment with the EU's Marine Strategy Framework Directive (MSFD), while Malta offers links to both relevant legislation and detailed assessments. Tunisia cites the involvement of specific governmental authorities. This combination of legal instruments, project-driven data collection, and broader policy adherence paints a multifaceted picture of regional efforts. For vulnerable areas (Action 6.1), and for ecosystem inventory (12.1) the means of verification are scarce for some of the countries. When considering spatial planning (Action 11.1), Libya's lack of verification accurately reflects its "Not Yet" status. Italy, conversely, cites the specific decree that formally approved its Maritime Space Management Plans, a concrete policy instrument. Malta refers to its Strategic Plan for Environment and Development (SPED) and the associated monitoring indicators designed to track progress. Finally, regarding trophic network studies, only Libya reports the lack of development of such studies.



**Goal 2: Ensure that biodiversity is preserved and maintained or enhanced:**

The focus shifts to proactive measures encompassing research, habitat mapping, fisheries management, and stakeholder engagement (Figure 4). A strong regional emphasis on *research and mapping* is evident. All four nations report activity in launching research projects focused on marine invertebrates (Action 17), crucial for understanding the health and functioning of marine ecosystems. However, the specific focus, methodologies, and intended outcomes of these research endeavours remain largely undefined in the provided data, making a thorough comparison challenging. The picture becomes more nuanced when examining habitat mapping efforts (Actions 19.1 and 19.2). While most countries report utilizing the updated SPA/RAC repository (Action 19.1), a key tool for standardized data collection and regional collaboration, Libya's progress is lagging, and Malta's is still ongoing, potentially hindering the development of a unified regional understanding of critical habitats. The actual mapping of key habitats (Action 19.2) reveals a similar pattern, with most nations reporting ongoing efforts. *Fisheries management and bycatch reduction* (Actions 21.1, 22.1, 22.2) present a more concerning picture, highlighting significant challenges and inconsistencies.

The identification of fisheries subsidies that contribute to overcapacity and overfishing (Action 21.1), a fundamental step towards sustainable fisheries, is only reported as complete by Italy and Malta. Data collection on the impacts of bycatch – the unintended capture of non-target species – (Action 22.1) is generally strong, except for Libya, which has not yet initiated this crucial monitoring. Efforts to adapt or ban fishing gear that poses the greatest risk to vulnerable species and habitats (Action 22.2) are underway in Libya and Tunisia ("In Progress"), but more concrete and widespread implementation is needed. Italy and Malta, report completion, but details are scarce. The evaluation of *co-management* opportunities (Action 23.1), involving stakeholders like small-scale fishers in decision-making processes, is reported universally. However, the actual implementation of co-management approaches (Action 23.2) shows more variation, with ongoing in Malta, and reportedly complete in other nations. Similarly, the area of addressing economic activities (26.1) and assessing opportunities (26.2), and the integration of SAPBIO, along with relevant contact (27.1, 27.2, 29.1, 29.2, 30.1), show regional progress, but need more specified means of verification.

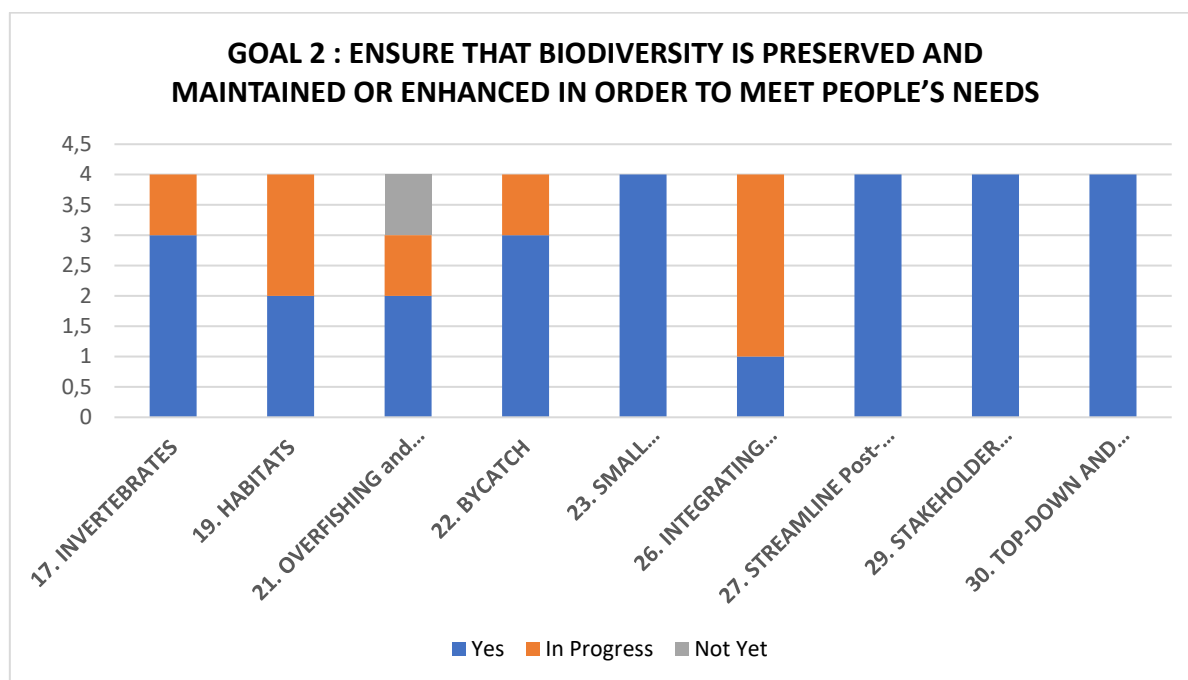


Figure 4. Overview of implementation progress for nationally relevant Post-2020 SAP BIO actions in the Ionian Sea-Central Mediterranean Sea sub-region: Goal 2.

### The "Means of Verification" for Goal 2 actions

For research and mapping (Actions 17, 19.1, 19.2), Libya's verifications consistently highlight a reliance on external support and project-based activities, suggesting capacity limitations. Italy often lacks specific verification, providing only general statements of compliance. Malta, in stark contrast, consistently provides the most detailed and transparent information, frequently including links to online resources, project descriptions, and published data. Tunisia's verifications are typically concise but point to relevant authorities or ongoing work. In the challenging domain of fisheries (Actions 21.1, 22.1, 22.2), Libya's verifications often refer to future plans or ongoing efforts, reflecting a nascent stage of development. Italy provides limited detail, hindering a thorough assessment of its actions.

Malta, again, stands out with extensive documentation, referencing specific monitoring programs, its participation in EU data collection frameworks, and targeted projects addressing bycatch mitigation, including collaborations with the fishing community. Tunisia's verifications are generally concise, mentioning relevant authorities or forthcoming strategic plans. For co-management (Actions 23.1, 23.2), Libya points to pending legislation, indicating a legislative approach is being pursued. Italy, again, provides no verification. Malta, demonstrably committed to participatory governance, details collaborative projects, workshops with fishers, and the development of a dedicated platform for fisher involvement in the management of Marine Protected Areas (MPAs). Tunisia provides limited verification. Progress is evident across the region in addressing economic aspects of conservation (26.1, 26.2) and in SAPBIO integration and stakeholder engagement (27.1, 27.2, 29.1, 29.2, 30.1); however, more detailed supporting evidence is required to fully understand the nature and effectiveness of these actions.

### Goal 3: Enable the necessary transformative change:

This goal focuses on the foundational elements required for sustained, long-term biodiversity conservation, including monitoring capacity, human resource development, and securing adequate funding (Figure 5). Progress in *identifying monitoring needs* (Action 34.1) is mixed, with Libya and Tunisia still in the process of defining their requirements, while Italy and Malta report completion. Encouragingly, all countries report receiving regional support for monitoring activities (Action 34.2), highlighting the importance of collaborative efforts.

The updating and harmonization of national monitoring programs (Action 34.3) to ensure data quality and comparability are underway in Libya ("In Progress") and completed in the other nations. In the crucial area of *capacity building*, all countries report integrating marine conservation concerns into educational curricula at the bachelor's and master's levels (Action 39.1), demonstrating a commitment to developing future expertise. However, identifying current employment baselines related to marine biodiversity conservation (Action 40.1) and assessing future employment needs (Action 40.2) show a more varied picture. Libya reports "Not Yet" for both, Italy is "In Progress," while Malta and Tunisia report completion ("Yes"). This suggests significant disparities in understanding the human resource landscape and planning for future workforce requirements. *Securing long-term funding* for nature conservation (Action 41.1) is a critical challenge. While most countries report that they have funding plans, what is yet to be developed in Libya.

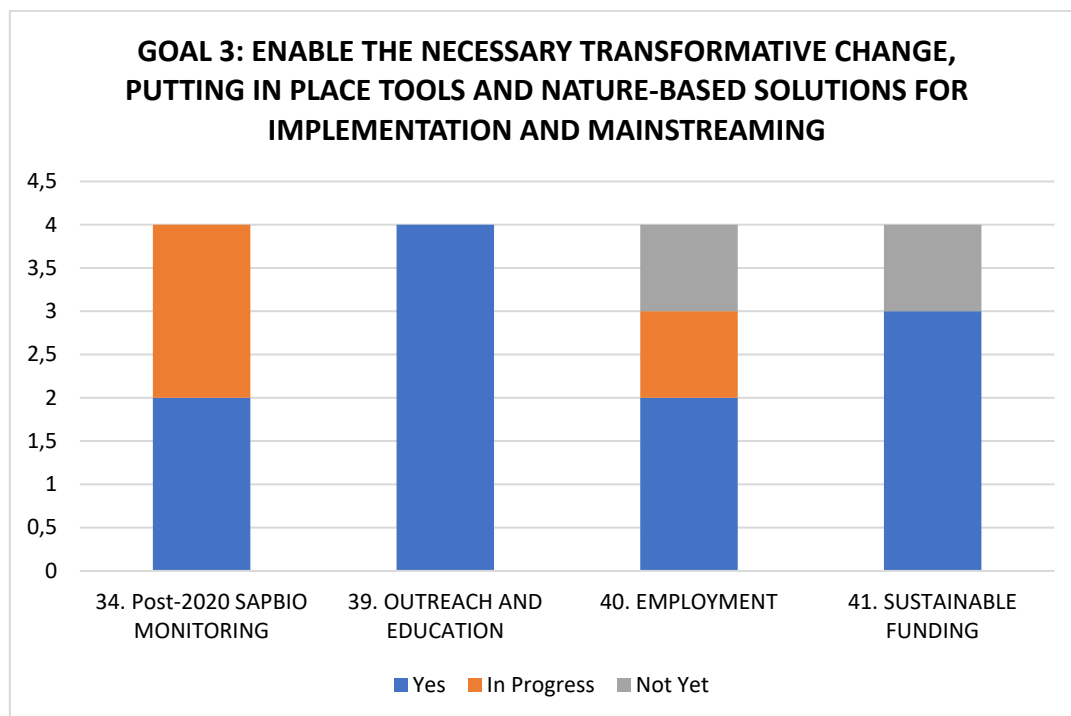


Figure 5. Overview of implementation progress for nationally relevant Post-2020 SAP BIO actions in the Ionian Sea-Central Mediterranean sub-region sub-region: Goal 3.

### The "Means of Verification" for Goal 3 actions

For monitoring (Actions 34.1, 34.2, 34.3), Libya highlights technical challenges as a barrier to progress. Italy provides limited verification, often lacking specific details. Malta references its comprehensive marine monitoring program, demonstrating a structured approach. Tunisia cites both financial and technical challenges, underscoring the resource constraints faced by some nations. In capacity building (Actions 39.1, 40.1, 40.2), Libya mentions ongoing work and points to administrative management as a significant hurdle. Italy, again, provides limited detail, hindering a thorough understanding of its efforts. Malta refers to specific university courses and relevant publications, showcasing a more concrete and verifiable approach. Tunisia cites regulatory and financial challenges as constraints. Finally, regarding long term funding, and while most of the countries do not provide detailed means of verification, Malta details the use of Prioritized Action Frameworks, to ensure funding and successful implementation.

### 3.2. Challenges and difficulties

While commitment exists for implementing SAPBIO in the subregion's countries, real-world obstacles are slowing progress (Figure 6). These range from basic resource limitations to complex policy and governance issues. Understanding these challenges is the first step towards finding collaborative solutions and ensuring the long-term health of the Mediterranean. In this section we present an overview of the challenges and difficulties encountered in implementing nationally relevant Post-2020 SAP BIO actions in the Ionian Sea and Central Mediterranean sub-region (Figure 6).

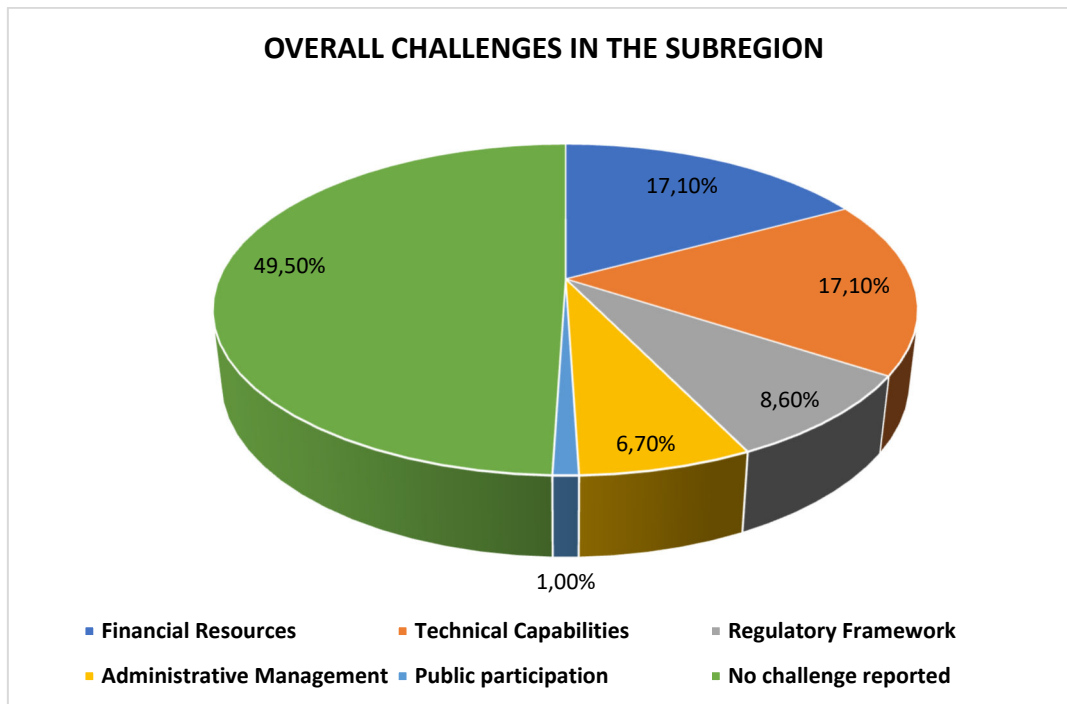


Figure 6. Overview of challenges and difficulties encountered in implementing nationally relevant Post-2020 SAP BIO actions in the Ionian Sea and Central Mediterranean sub-region.

Across the board, several key themes emerge:

- **Financial Resources:** Almost every country highlights a lack of sufficient funding as a major impediment. This affects everything from conducting baseline studies on invasive species to implementing monitoring programs and enforcing regulations. Simply put, conservation efforts need sustained financial investment.
- **Technical Capabilities:** Expertise is crucial. Many countries report a shortage of trained personnel and the necessary technical infrastructure to carry out tasks like mapping key habitats, assessing bycatch, or monitoring the effectiveness of spatial plans. Building capacity through training and technology transfer is vital.
- **Regulatory Frameworks:** Even when the will exists, translating international agreements and guidelines into national laws and regulations can be a slow and complex process. Gaps in existing legislation, or difficulties in enforcing new rules, are frequently reported problems.
- **Administrative Management:** Coordination between different government agencies, and even within individual ministries, can be a challenge. Streamlining bureaucratic processes and improving communication are essential for effective implementation.
- **Public Participation:** Sometime Public can be resistance for new implementation.

While the above challenges are common, each country also faces its own unique set of circumstances:

- **Libya:** Libya is facing challenges with foundational issues, including establishing a robust policy framework and overcoming administrative difficulties. Building basic capacity in many areas is a priority.
- **Italy:** Italy has made significant steps in many areas, such as developing a National Biodiversity Strategy and incorporating relevant provisions into national laws. They report very few issues.
- **Malta:** Malta demonstrates a strong commitment and has implemented many SAPBIO provisions. Public engagement and some administrative streamlining are areas where they are focusing their efforts.
- **Tunisia:** Tunisia faces a broader range of challenges, encompassing financial, technical, and regulatory hurdles. Strengthening the legal framework and building capacity across multiple areas are key priorities.

### Challenges in Achieving SAPBIO Goal 1:

Implementing SAPBIO's Goal 1, focused on building foundational conditions for conservation in the Ionian Sea-Central Mediterranean, faces significant hurdles, particularly for Tunisia and Libya (Figure 7). The primary obstacles are a widespread lack of financial resources (reported 13 times across all Goal 1 actions for all countries) and technical capabilities (reported 12 times). Tunisia, in particular, struggles with these limitations, mentioning financial and technical challenges 8 times each across various Goal 1 actions. Libya also frequently reports these issues, with 5 mentions for financial resources and 4 for technical capabilities.

Countries struggle to fund and staff essential activities like biodiversity monitoring, research, and management. Specifically, actions related to controlling Non-Indigenous Species (NIS) are severely hampered, hindering baseline studies and effective monitoring. Beyond funding and expertise, inadequate regulatory frameworks (reported a total of 8 times) pose a major problem, particularly for actions like species recovery and NIS control, where strong laws and enforcement are crucial. Tunisia faces this regulatory challenge in 5 out of 9 assessed actions. While less pervasive, administrative management issues (5 total mentions), especially in coordinating spatial planning efforts, also hinder progress; this is a notable issue for Malta (mentioned twice) and to less extent in Libya (mentioned twice). Public participation, though less frequently reported (only twice, related to species recovery), is important, being a specific challenge highlighted by Malta. Ultimately, achieving Goal 1 requires a comprehensive strategy addressing these interconnected challenges: investing in training and infrastructure, strengthening legal frameworks, improving inter-agency coordination, and engaging the public. The provided data consistently showed that Italy has not explicitly reported challenges in these areas within this dataset. A collaborative, sub-regional approach, tailored to each country's needs, is vital for success, with a clear need for focused support for Tunisia and Libya.

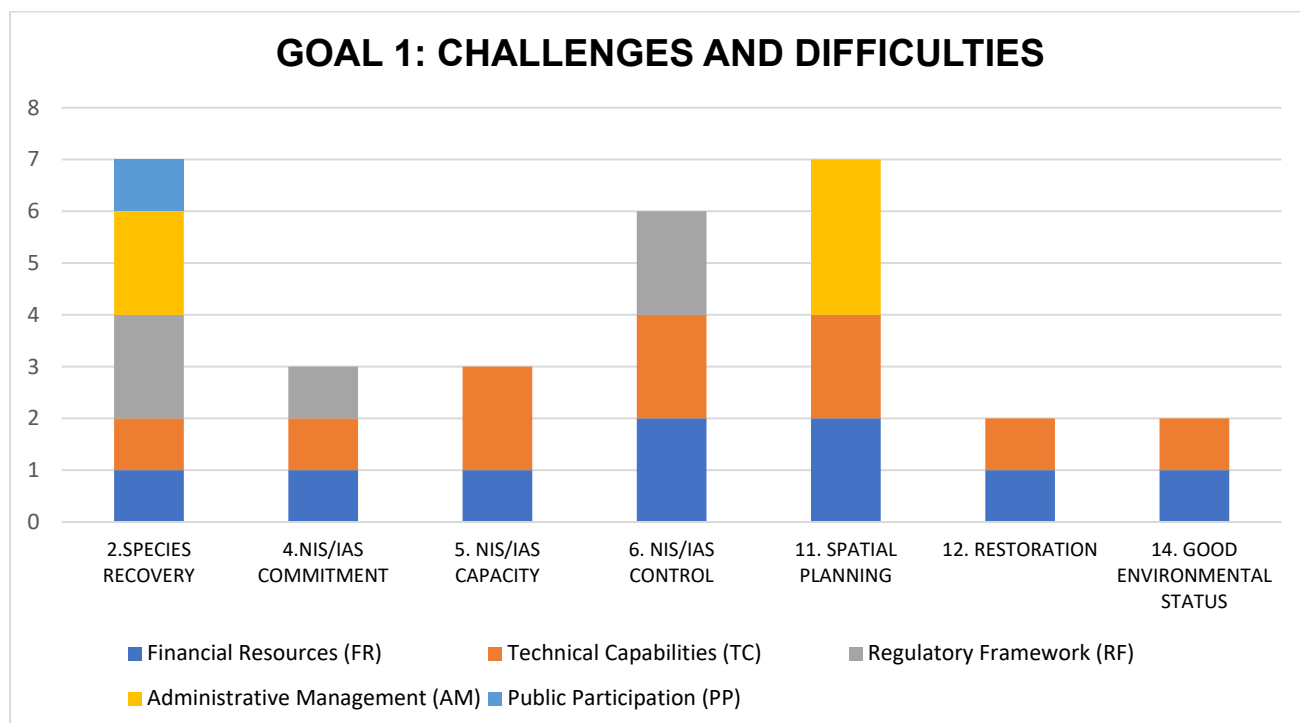


Figure 7. Overview of challenges and difficulties encountered in implementing nationally relevant Post-2020 SAP BIO actions in the Ionian Sea-Central Mediterranean sub-region under Goal 1

### Challenges in Achieving SAPBIO Goal 2: Reducing Threats in the Mediterranean

SAPBIO Goal 2, aimed at reducing direct threats to Mediterranean marine biodiversity, faces significant implementation challenges in the Ionian Sea-Central Mediterranean region (Figure 8). The most prominent obstacles are technical capabilities (reported 21 times across all Goal 2 actions and countries) and financial resources (reported 14 times). These limitations are particularly acute in actions related to fisheries management (Actions 21, 22, and 23), where expertise in areas like stock assessment and gear technology is crucial, and research-intensive actions (17, 19 and 34) requiring investment in equipment and personnel. Although the original text provided doesn't break down challenges by country, the data tables, especially Goal 2/country matrix, showed the highest values were in Tunisia.

Regulatory frameworks also pose a significant challenge (10 mentions), especially concerning overfishing and illegal fishing (Action 21), highlighting the need for stronger laws and enforcement. Administrative management is a less frequent but still present issue (2 mentions), specifically in coordinating efforts to combat illegal fishing. Public participation was not reported. While all countries in the sub-region (Libya, Italy, Malta, and Tunisia) contribute to these overall figures, previous analyses consistently pointed to Tunisia and Libya as facing the most pervasive challenges across multiple SAPBIO goals, including Goal 2. Achieving Goal 2 requires a targeted approach focused on building technical capacity, securing adequate funding, and strengthening regulatory frameworks, with particular attention to the needs of Tunisia and Libya, while fostering regional cooperation.

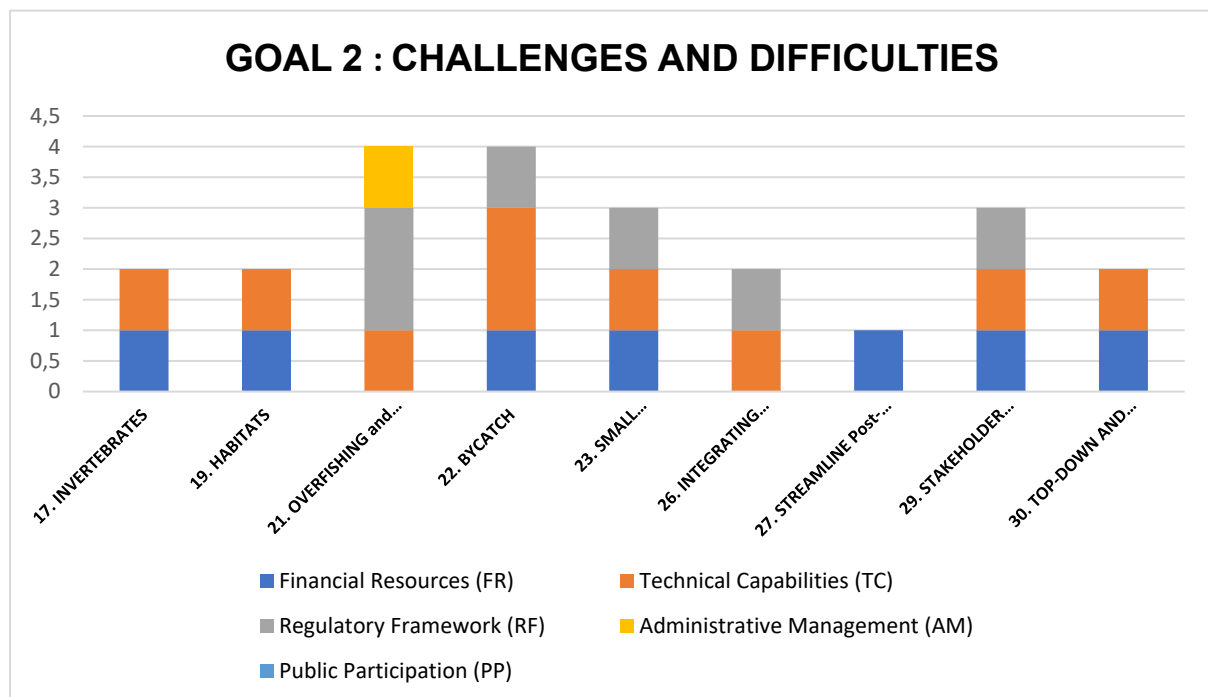


Figure 8. Overview of challenges and difficulties encountered in implementing nationally relevant Post-2020 SAP BIO actions in the Ionian Sea-Central Mediterranean sub-region under Goal 2

### Challenges in Achieving SAPBIO Goal 3: Strengthening Tools for Conservation

SAPBIO's Goal 3, focused on strengthening the tools for long-term marine conservation in the Ionian Sea-Central Mediterranean, faces key challenges (Figure 9) primarily related to **technical capabilities** (reported 10 times across all Goal 3 actions and countries) and **financial resources** (reported 6 times). Developing and implementing effective monitoring programs (Action 34), outreach and education initiatives (Action 39), and even assessing employment needs in the conservation sector (Action 40) all demand specialized expertise and significant investment. **Regulatory frameworks** (4 mentions) also present obstacles, particularly in establishing

policies that support green jobs and secure long-term funding (Actions 40 and 41). **Administrative management** (2 mention), specifically coordinating efforts related to employment in conservation (Action 40), is another, albeit less frequent, challenge. Successfully achieving Goal 3 requires a comprehensive approach: investing in training and infrastructure, securing sustainable funding, and creating supportive regulatory environments, with particular attention to building capacity in countries like Tunisia and Libya.

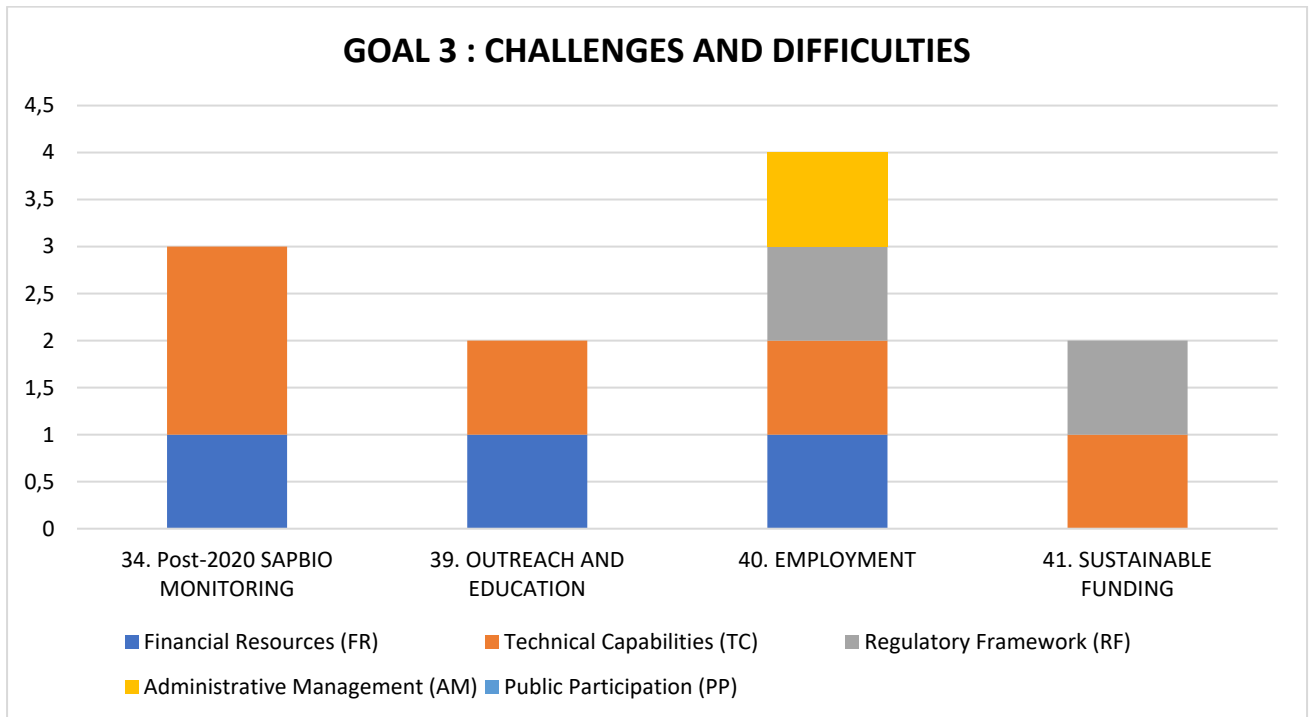


Figure 9. Overview of challenges and difficulties encountered in implementing nationally relevant Post-2020 SAP BIO actions in the Ionian Sea-Central Mediterranean sub-region under Goal 3

### 3.3. Conclusions

#### Methodology and Country Feedback

- The simplified table used to assess progress on nationally scoped Post-2020 SAPBIO actions in the Ionian Sea-Central Mediterranean provides only *indicative* information. Its reliance on self-reported data, subject to individual country interpretation, is a key limitation. The original SAPBIO actions lacked sufficiently quantifiable result indicators, making it difficult to objectively validate implementation.
- All four countries in the sub-region (Libya, Italy, Malta, and Tunisia) completed the questionnaire. However, the level of detail and supporting evidence (means of verification) varied considerably, particularly for Goals 2 and 3. Italy provided very little supporting information in general.
- Responses were more detailed for Goal 1 actions, possibly because National Focal Points are often affiliated with environmental ministries, making it harder to address questions related to fisheries, maritime transport, etc., without extensive inter-ministerial consultation.

#### Mid-term Progress Assessment

- While countries generally reported positive progress, particularly in areas like species recovery (Goal 1, Action 2) and Post-2020 SAPBIO Monitoring (Goal 3, Action 34), responses for Goals 2 and 3 should be interpreted cautiously due to the limited supporting evidence.
- The least progress was consistently reported in areas requiring cross-sectoral cooperation, such as integrating biodiversity into other sectors (Goal 2, Action 26) and increasing employment in marine conservation (Goal 3, Action 40). Actions related to NIS/IAS commitment (Goal 1, Action 4) also showed slow progress.
- A clear disparity exists between EU member states (Italy and Malta) and non-EU member states (Libya and Tunisia). Italy and Malta generally reported better progress, likely due to the requirements of EU legislation (like the Marine Strategy Framework Directive - MSFD) and better access to EU funding.
- The most significant challenges consistently identified across all three Goals are limited **financial resources**, insufficient **technical capabilities**, and, to a lesser extent, weaknesses in **regulatory frameworks** and **administrative management**. These challenges are broadly distributed, although technical capabilities are most frequently cited overall. No data on gender disparities was provided or analysed.

### 3.4. Recommendations

#### Methodology and Country Feedback

- The Post-2020 SAPBIO should be revised to include more quantifiable indicators for each action, allowing for more objective measurement of implementation progress.
- Future assessments should refine the questionnaire to reduce ambiguity and make the "means of verification" section mandatory, ensuring that positive responses are supported by concrete evidence.



## Mid-term Progress Assessment

### For SPA/RAC:

- Prioritize support for countries to improve cross-sectoral cooperation, particularly in integrating biodiversity considerations into sectors like fisheries, tourism, and maritime transport.
- Provide targeted assistance to non-EU countries (Libya and Tunisia), focusing on areas of identified weakness, such as NIS management, bycatch mitigation, habitat conservation, and building technical capacity across all Goals.
- Facilitate knowledge sharing and best-practice exchange between EU and non-EU member states within the sub-region.

### For Countries:

- **Non-EU Countries (Libya and Tunisia):** Actively seek and utilize available support mechanisms, including technical assistance and funding opportunities from international organizations and EU programs. Prioritize strengthening regulatory frameworks and building technical capacity in key areas.
- **EU Member States (Italy and Malta):** Continue to leverage EU legislation and funding to maintain progress in marine biodiversity conservation. Provide targeted support and mentorship to non-EU countries within the sub-region, sharing expertise and best practices.
- **All Countries:** Enhance regional cooperation to address transboundary issues, such as NIS management, migratory species conservation, and fisheries management. This could involve joint projects, data sharing, and coordinated monitoring efforts. Prioritize investment in building technical capabilities (training, equipment, and expertise) and securing sustainable financial resources for long-term SAPBIO implementation. Strengthen regulatory frameworks and improve administrative coordination between government agencies.

**Adriatic Sea Sub-region report**

## List of Acronyms/Abbreviations

<b>CoP</b>	Conference of the Parties
<b>EcAp</b>	Ecosystem Approach
<b>EU</b>	European Union
<b>GES</b>	Good Environmental Status
<b>IAS</b>	Invasive Alien Species
<b>IMAP</b>	Integrated Monitoring and Assessment Programme
<b>IUU</b>	Illegal, Unreported, and Unregulated (Fishing)
<b>MAP</b>	Mediterranean Action Plan
<b>MSFD</b>	Marine Strategy Framework Directive
<b>NIS</b>	Non-Indigenous Species
<b>SPA/RAC</b>	Specially Protected Areas Regional Activity Centre Strategic Action Programme for the Conservation of Biological Diversity in the
<b>SAP BIO</b>	Mediterranean Region
<b>UNEP</b>	United Nations Environment Programme

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## 1. Introduction

The Post-2020 Strategic Action Programme for the Conservation of Biodiversity and Sustainable Management of Natural Resources in the Mediterranean Region (Post-2020 SAPBIO), adopted by the 22<sup>nd</sup> Conference of the Parties (CoP 22) (Decision IG 25/11), is the main strategic document aimed at preserving and restoring biodiversity across the region by 2030. Pursuant to the CoP 23 Decision IG.26/5, the Regional Activity Centre for Specially Protected Areas (SPA/RAC) is tasked with conducting a mid-term evaluation of the Post-2020 SAPBIO to assess the collective progress made by the Contracting Parties.

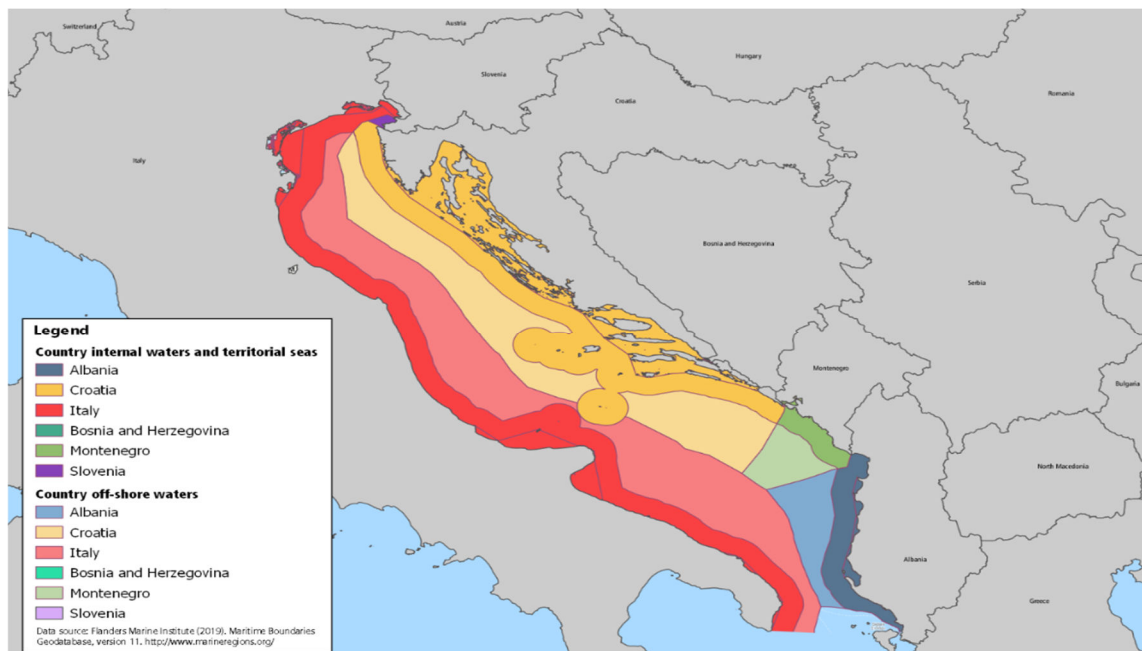
The main aims of the mid-term assessment for the Adriatic Sea sub-region are:

- to understand the state/progress of the implementation of the Post-2020 SAP BIO (based on set targets and actions); notably the positive achievements, but even more so the gaps and setbacks encountered in the process, which require more attention and improvement
- to recommend steps/actions for improving the implementation of the Post 2020 SAP BIO in the next period up to 2030.

This assessment is prepared for SPA/RAC by Ana Štrbenac, Stenella consulting ltd, Croatia, as selected expert for the Adriatic Sea sub-region.

The **Adriatic Sea** is a semi-enclosed sea located in the northernmost part of the Mediterranean Sea, stretching approximately 800 kilometres from northwest to southeast (**Figure 1**). It covers an area of about 138,600 square kilometres and is bordered by six countries along its extensive coastline: Albania, Bosnia and Herzegovina, Croatia, Italy<sup>1</sup>, Montenegro and Slovenia. Croatia and Italy hold the largest share of the Adriatic coastline, while Bosnia and Herzegovina have the smallest share. Croatia, Italy and Slovenia are the EU Member States, while Albania, Bosnia and Herzegovina and Montenegro are EU candidate countries.

The Adriatic Sea plays a significant role in the regional ecosystem and economy, with its diverse marine life and extensive coastline supporting key industries such as tourism and fishing.



**Figure 4.** Orientational map of maritime jurisdiction within the Adriatic Sea. Source: UNEP/MAP-PAP/RAC-SPA/RAC and MESPU, 2021

<sup>1</sup> Italy regions with Adriatic Sea coastline: Friuli - Venezia Giulia, Veneto, Emilia-Romagna, Le Marche, Abruzzo, Molise and Puglia

## 2. Methodology

This mid-term assessment focusses on implementation progress of 20 nationally scoped actions stipulated in the Annex III of the Post-2020 SAP-BIO. More specifically, it analyses implementation of start-up activities undertaken by 2025.

This assessment is primarily based on countries' responses to a tailor-made simplified table (questionnaire), which included binary questions, supported with means of verifications, as well as specific questions to identify gaps and challenges encountered for their implementation. More specifically, countries were able to choose from an already proposed set of responses regarding implementation progress, as well as those related to challenges. It should also be noted that for some actions more than one question was posed (more details in **Annex I**).

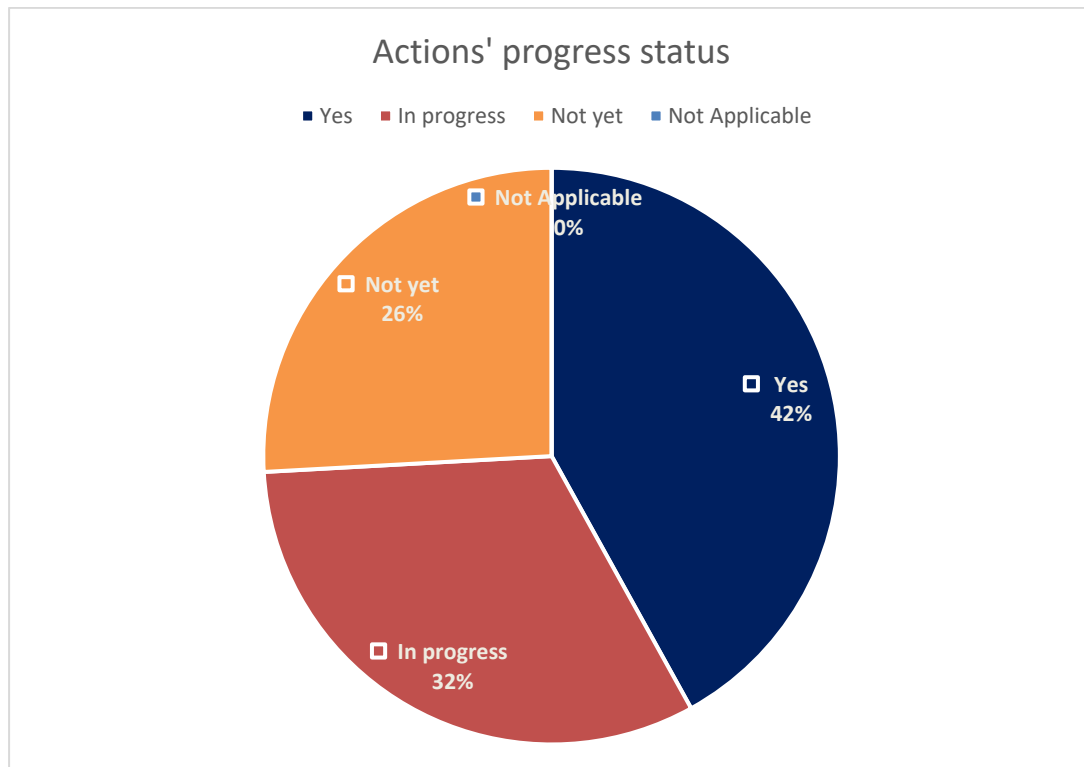
This approach allows countries to conduct self-assessment and provide indicative updates on the progress of actions in relatively rapid manner. However, it also has its limitations. Primarily, it remains highly subjective. For example, it does not quantify the meaning of pre-selected response options (e.g., what constitutes a sufficient level of progress for an action to be marked as 'yes'), leaving room to countries to interpret assessment of progress differently. This is largely due to lack of quantifiable results (indicators) of the planned actions in the Post-2020 SAP BIO Annex III itself. Nevertheless, the information gathered provides a useful indication of implementation progress, helping to understand both positive and negative developments and propose recommendations for improving implementation.

In early February 2025, SPA/RAC sent the online questionnaire to the Barcelona Convention Focal Points, including those of all six Adriatic countries, with a deadline of 17 days for responses. Feedback has been received from five Adriatic countries: Italy, Croatia, Albania, Bosnia and Herzegovina and Montenegro. Croatia did not respond to questions on actions related to fisheries (Actions 23, 24 and 25) and NIS/IAS commitment (Action 5), as consultation with relevant ministries for fisheries and marine transport were required. Data from Slovenia has not yet been received and is therefore not included in the analysis.

## 3. Mid-term Post 2020 SAP-BIO implementation progress

### 3.1. Actions implementation progress

Adriatic countries reported that the majority of actions were successfully implemented (42%) or are still in progress (32%). On the other hand, implementation of approximately one-quarter of actions (26%) has not yet started (**Figure 2**). Such progress is also measured at the level of specific goals, with no particular goal standing out.



**Figure 5.** Overview of implementation progress for nationally relevant Post-2020 SAP BIO actions in the Adriatic Sea sub-region

A more in-depth analysis at the level of individual goals, shows that the most significant progress under **Goal 1 - Reduce the threats to biodiversity** is done in Restoration actions (Action 12) and NIS/IAS control (Action 6), while the least progress has been made in NIS/IAS commitment (Action 4) and Species recovery (Action 2) (**Figure 3**).

Some countries have provided means of verification (examples) of specific positive efforts undertaken within particular actions. Regarding **Species recovery, (Action 2)** one country (Croatia) reported having a functional National stranding network, operating according to the *Protocol for Alerting and Monitoring of dead, sick or injured strictly protected marine species (marine mammals, sea turtles and cartilaginous fish)*. For **NIS/IAS commitments (Action 4)**, one country (Italy) referred to adoption of specific measures under the Marine Strategy Framework Directive – MSFD (Directive 2008/56/EC).

Furthermore, for **NIS/IAS capacity (Action 5)** one country (Croatia) reported positive progress in conducting initial baseline studies on NIS, which are also linked to the MSFD requirements. For the same action, Montenegro reported that regular monitoring of IAS is conducted annually and information is published as a part of State of Environment Reports.

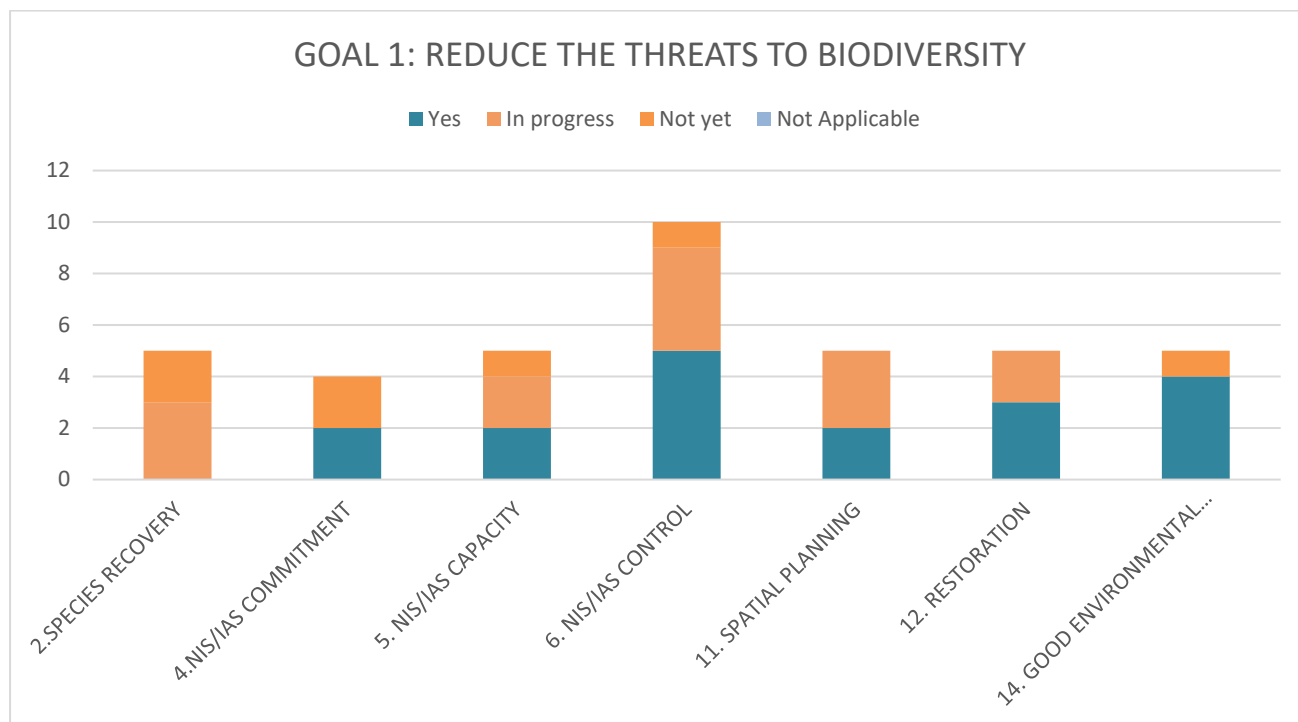
Regarding **NIS/IAS control (Action 6)**, greater progress was reported in NIS/IAS monitoring in EU countries, largely due to MSFD requirements. However, identification of vulnerable area and priority sites for urgent mitigation actions remain largely in progress.

**Spatial planning action (Action 11)** is still for the most part a “work in progress”. In EU countries, this effort is linked to the Marine Spatial Planning Directive (Directive 2014/89/EU). For example, Italy approved in 2024 its Maritime Space Management Plan, while Croatia is currently developing a marine spatial plan for its EEZ, which was declared in 2021.

Concrete means of verification for progress relevant in **Restoration (Action 12)** have been reported by some countries. Croatia mentioned development of detailed maps of coastal and seabed habitats under national jurisdiction reported (co-funded from the EU funds), while Albania reported a

monitoring programme on state of these habitats and Montenegro reported that the inventory of mentioned habitats is ongoing.

Efforts related to **Good Environmental Status (Action 14)** indicate that the majority of countries have promoted scientific research on trophic networks and overall ecosystem functioning to consolidate the science base for evaluating Good Environmental Status (GES) within the Ecosystem Approach (EcAp/IMAP). In EU Member States, these efforts are primarily linked to MSFD requirements.



**Figure 6.** Overview of implementation progress for nationally relevant Post-2020 SAP BIO actions in the Adriatic Sea sub-region: **Goal 1.**

As for **Goal 2 - Ensure that biodiversity is preserved and maintained or enhanced in order to meet people's needs**, the most significant progress has been done in Overfishing and IUU (Action 23), Stakeholders participation (Action 29), and Habitats (Action 19). Implementation of other action shows equally positive progress, with the least positive progress reported in Integrating biodiversity (Action 26) and Small-Scale Fisheries (Action 23) (**Figure 4**).

Some countries have also provided means of verification (examples) of specific positive efforts undertaken within particular actions.

Regarding **Invertebrates (Action 17)**, Croatia reported having a developed monitoring programmes for number of marine habitats and associated invertebrates, such as reefs, *Pinna nobilis* etc. Developments of these programmes was co-funded from the EU funds. Bosnia and Herzegovina reported some individual research, that was done in the scope of small, one-time based projects.

Croatia have reported significant progress in **Habitats (Action 19)**, mentioning again development of a more detailed map of coastal and sea bottom habitats in the area under national jurisdiction (same as for Action 12 – Restoration).

Although countries provided their view about progress with implementation of **actions related to fisheries (Actions 21,22 and 23)**, they have not provided some concrete examples to support this assessment.

For **Integrating biodiversity (Action 26)**, Croatia reported ongoing development of methodologies to address harmful subsidies.

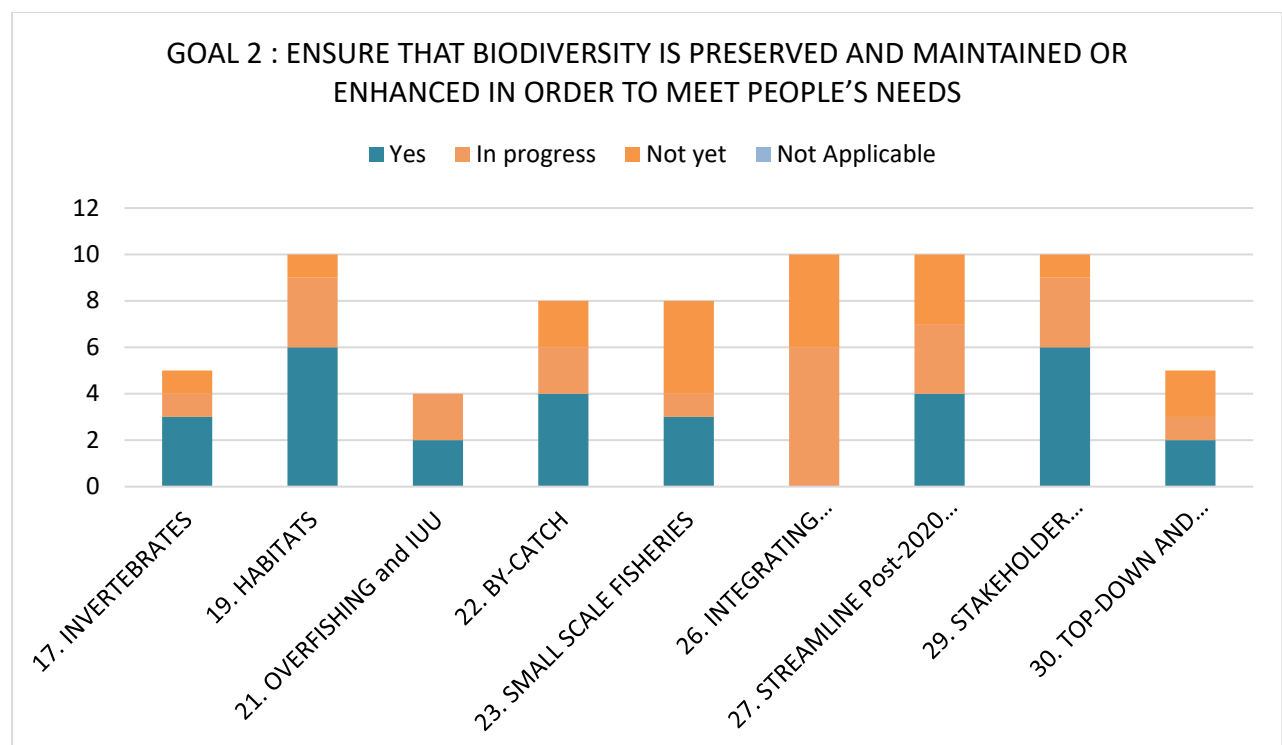
Countries reported positive progress regarding **Streamline Post-2020 SAP BIO (Action 27)**. Croatia particularly mentioned that it is aligning national targets with the Kunming-Montreal Global Biodiversity Framework with a plan to start drafting new National Biodiversity Strategy in 2025, which will integrate Post-2020 SAPBIO elements.

Countries reported particularly positive progress in **Stakeholders participation (Action 29)**, but have not pointed out some concrete means of verification.

**Top-down and bottom-up upscaling of international commitments (Action 30)**, seem to be successful, but no specific means of verification were provided.

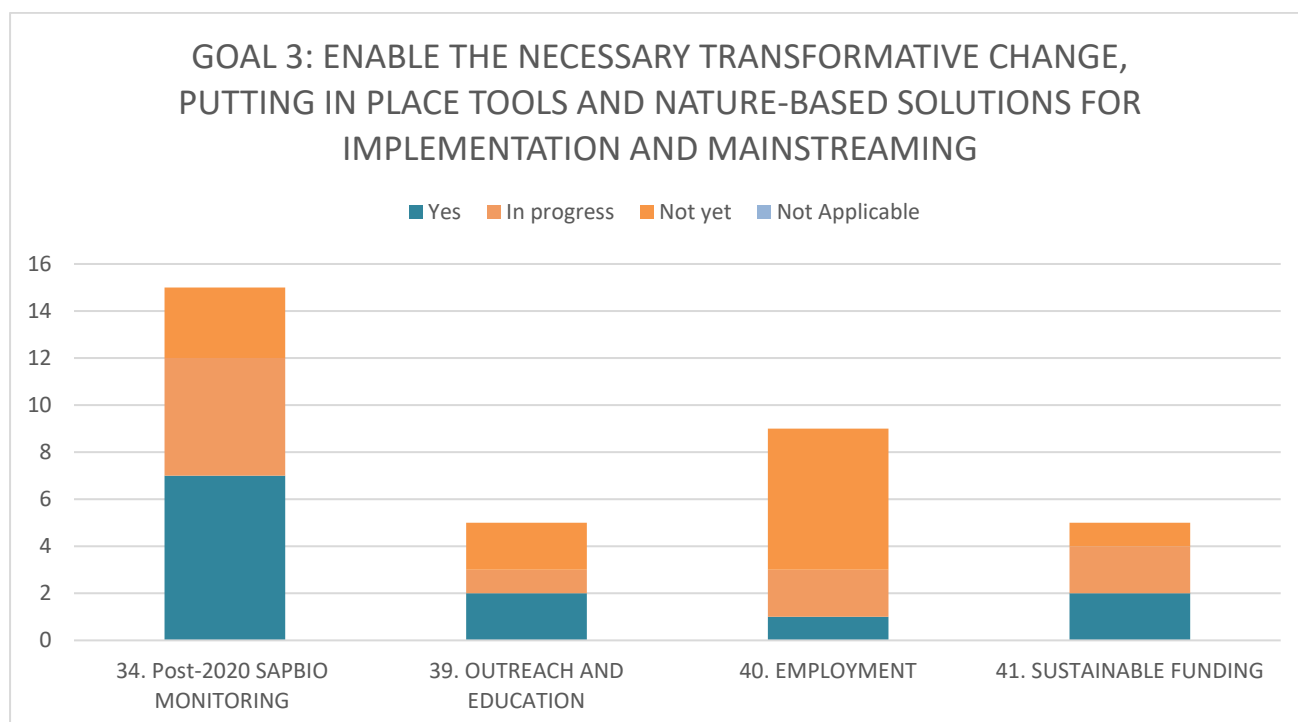
Regarding ***Goal 3– Enable the necessary transformative change, putting in place tools and nature-based solutions for implementation and mainstreaming***, the most significant progress has been done in Post-2020 SAP BIO monitoring (Action 34) and the least progress is reported for Employment (Action 40) (**Figure 5**).

Although all countries reported about the progress of relevant Goal 3 actions, they have not provided concrete means of verification, apart from Croatia which made a reference to existing national monitoring programmes, relevant for collection of data to ensure quality data and reporting, related to MSFD requirements.



**Figure 7.** Overview of implementation progress for nationally relevant Post-2020 SAP BIO actions in the Adriatic Sea sub-region: **Goal 2**





**Figure 8.** Overview of implementation progress for nationally relevant Post-2020 SAP BIO actions in the Adriatic Sea sub-region: **Goal 3**.

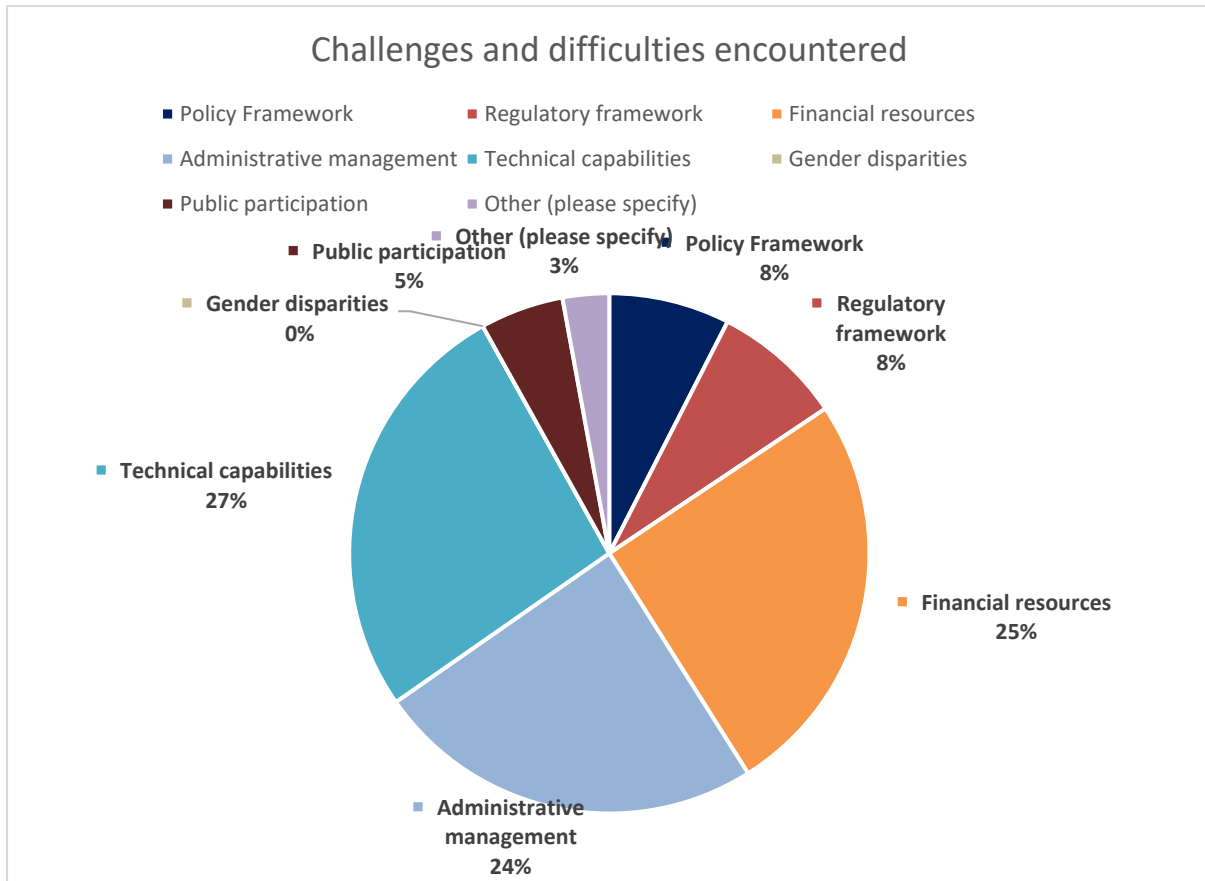
### 3.2. Challenges

Regardless of the reported positive progress in implementing Post -2020 SAP BIO actions, countries have identified a set of challenges and difficulties that threaten further progress.

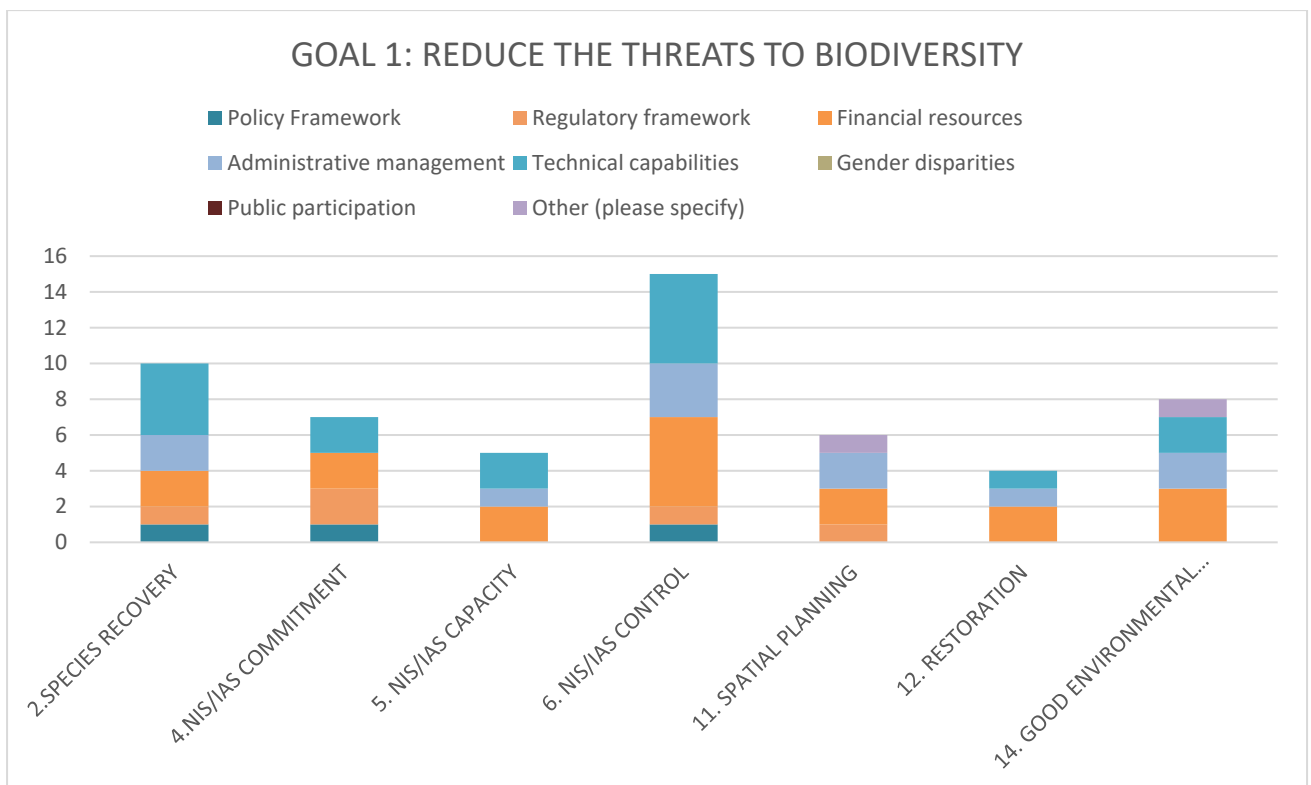
Overall, the majority of Adriatic countries reported challenges related to limited technical capacities, financial resources and administrative management. No gender disparities were reported. Additionally, beyond the proposed challenge options, coordination between responsible institutions has been reported as an additional challenge for all goals (**Figure 6**).

In principle, these results correspond to those observed of all three individual goals, with slight variations in the order of significance for each goal. For example:

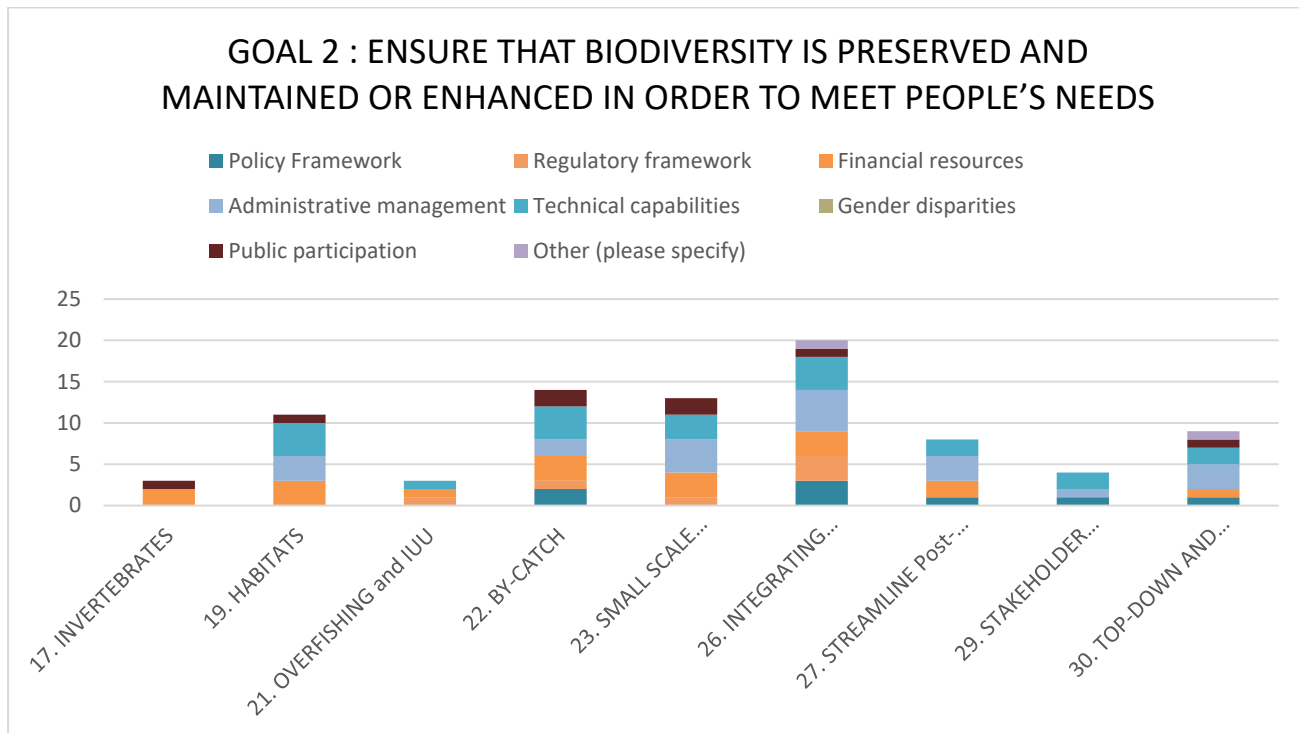
- **Goal 1.** The major challenges are limited financial resources and technical capacities, while no issues were reported with gender disparities and public participation. (**Figure 7**).
- **Goal 2.** The main challenges identified are limited technical capacities and administrative management. Gender disparities remain irrelevant, however unlike in Goal 1, a lack of public participation appears to be a more significant challenge (**Figure 8**).
- **Goal 3.** The primary challenge is lack of adequate administrative management, followed by the previously mentioned issues of limited technical capacities and financial resources. As in Goal 1, no problems were reported with gender disparities or public participation (**Figure 9**).



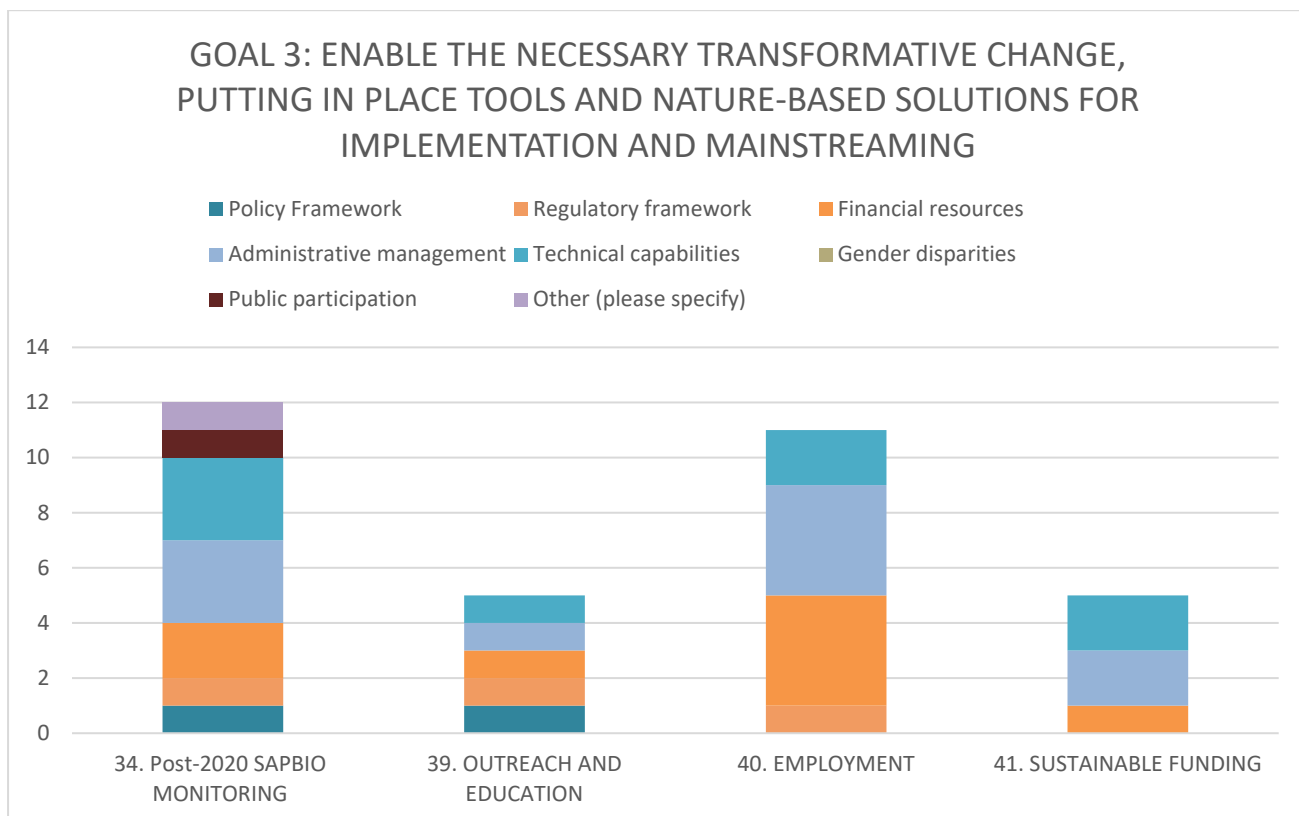
**Figure 9.** Overview of challenges and difficulties encountered in implementing nationally relevant Post-2020 SAP BIO actions in the Adriatic Sea sub-region



**Figure 10.** Overview of challenges and difficulties encountered in implementing nationally relevant Post-2020 SAP BIO actions in the Adriatic Sea sub-region under **Goal 1**



**Figure 11.** Overview of challenges and difficulties encountered in implementing nationally relevant Post-2020 SAP BIO actions in the Adriatic Sea sub-region under **Goal 2**



**Figure 12.** Overview of challenges and difficulties encountered in implementing nationally relevant Post-2020 SAP BIO actions in the Adriatic Sea sub-region under **Goal 3**

## 4. Conclusions and Recommendations

### 4.1. Conclusions

#### Methodology and countries feedback

- The simplified questionnaire, aimed at gathering information from countries about the implementation progress of nationally scoped Post-2020 SAP BIO actions, is a tool that can only provide indicative information about progress.
- This tool relies largely to the subjective interpretation of responses by individual countries, which is its main limitation. One reason for this is the lack of more quantifiable results indicators in the originally planned actions., which would help validate whether the actions have been adequately implemented.
- The majority of Adriatic countries filled the questionnaire: Albania, Bosnia and Herzegovina, Croatia, Italy and Montenegro. However, only some of these countries provided certain evidence (means of verification) to support their responses about progress, primarily for the Goal 1 actions.
- More detailed responses to actions under Goal 1 could be linked to the fact that National Focal Points (FPs) are mostly affiliated to the institutions (ministries) competent for marine environment protection/biodiversity conservation, which limits their capability to respond to questions related to fisheries, maritime transport etc. without consultations with these ministries.

#### Mid-term progress assessment

- The majority of countries indicate the overall **positive progress** in implementing actions, particularly for **Goal 1** - Restoration (Action 12), and NIS/IAS control (Action 6), **Goal 2** - Overfishing and IUU (Action 23), Stakeholders participation (Action 29), and Habitats (Action 19 and **Goal 3** – Post-2020 SAP BIO Monitoring (Action 34). However, responses for actions of the Goals 2 and 3 should be taken with some additional caution, particularly due to lack of means of verification to support responses.
- The **least progress** was reported for **Goal 1** - NIS/IAS commitment (Action 4) and Species recovery (Action 2), **Goal 2** - Integrating biodiversity (Action 26) and Small-Scale Fisheries (Action 23), and **Goal 3** - Employment (Action 40). This indicates that cooperation with other sectors stills has room for significant improvement, as does increasing of employment in marine biodiversity conservation.
- Overall, the EU Member states reported better progress than non-EU Member states, which is linked to requirements of the EU legislation (particularly MSFD), as well as better access to the EU funds
- The major **challenges and difficulties** for effective implementation are limited financial resources, technical capacities and administrative management. These are to the most part equally distributed across all goals. No gender disparities were reported.

## **4.2. Recommendations**

### **Methodology and countries feedback**

- For further assessments, identify as many quantifiable indicators as possible for measuring the implementation progress of actions planned in the Post-2020 SAP BIO, as well as the achievement of goals.
- Improve the existing questionnaire so to leave less room for interpretation of questions. For a start, make the “means of verification” section mandatory, as it provides more concrete support for positive responses to particular questions.

### **Mid-term progress assessment**

#### **For SPA/RAC**

- Encourage countries to focus on improving cooperation with other sectors, with particular emphasis on integrating biodiversity in sectors
- Enhance support to non-EU countries, starting with topics highlighted in the mid-term assessment, such as some NIS/IAS aspects, integrating biodiversity, bycatch, marine habitats conservation,

#### **For countries**

- For non-EU Adriatic states - make better use the benefits available from their EU candidate countries status, particularly the requirements related to conservation of marine biodiversity (such as MSFD etc.) and related funding
- For EU Member States - continue investing resources in relevant marine biodiversity conservation activities, using existing legislative and funding tools,
- Further improve technical and other cooperation between countries (particularly between EU and non-EU), needed for addressing transboundary issues such as NIS/IAS, different aspects of migratory species conservation (e.g. mitigation of bycatch) etc. This could include undertaking of joint project, knowledge transfer etc.

**Aegean Sea and Levantine Basin Sub-region report**

## List of Acronyms/Abbreviations

<b>CoP</b>	Conference of the Parties
<b>EcAp</b>	Ecosystem Approach
<b>EU</b>	European Union
<b>GES</b>	Good Environmental Status
<b>IAS</b>	Invasive Alien Species
<b>IMAP</b>	Integrated Monitoring and Assessment Programme
<b>IUU</b>	Illegal, Unreported, and Unregulated (Fishing)
<b>MAP</b>	Mediterranean Action Plan
<b>MSFD</b>	Marine Strategy Framework Directive
<b>NIS</b>	Non-Indigenous Species
<b>SPA/RAC</b>	Specially Protected Areas Regional Activity Centre Strategic Action Programme for the Conservation of Biological Diversity in the
<b>SAP BIO</b>	Mediterranean Region
<b>UNEP</b>	United Nations Environment Programme
<b>MPA</b>	Marine Protected area

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## 1. Introduction

The Post-2020 Strategic Action Programme for the Conservation of Biodiversity and Sustainable Management of Natural Resources in the Mediterranean Region (Post-2020 SAPBIO), adopted by the 22<sup>nd</sup> Conference of the Parties (CoP 22) (Decision IG 25/11), is the main strategic document aimed at preserving and restoring biodiversity across the region by 2030. Pursuant to the CoP 23 Decision IG.26/5, the Regional Activity Centre for Specially Protected Areas (SPA/RAC) is tasked with conducting a mid-term evaluation of the Post-2020 SAPBIO to assess the collective progress made by the Contracting Parties.

The main aims of the mid-term assessment for the Aegean Sea and Levantine Basin Sub-region are:

- to understand the state/progress of the implementation of the Post-2020 SAP BIO (based on set targets and actions); notably the positive achievements, but even more so the gaps and setbacks encountered in the process, which require more attention and improvement
- to recommend steps/actions for improving the implementation of the Post 2020 SAP BIO in the next period up to 2030.

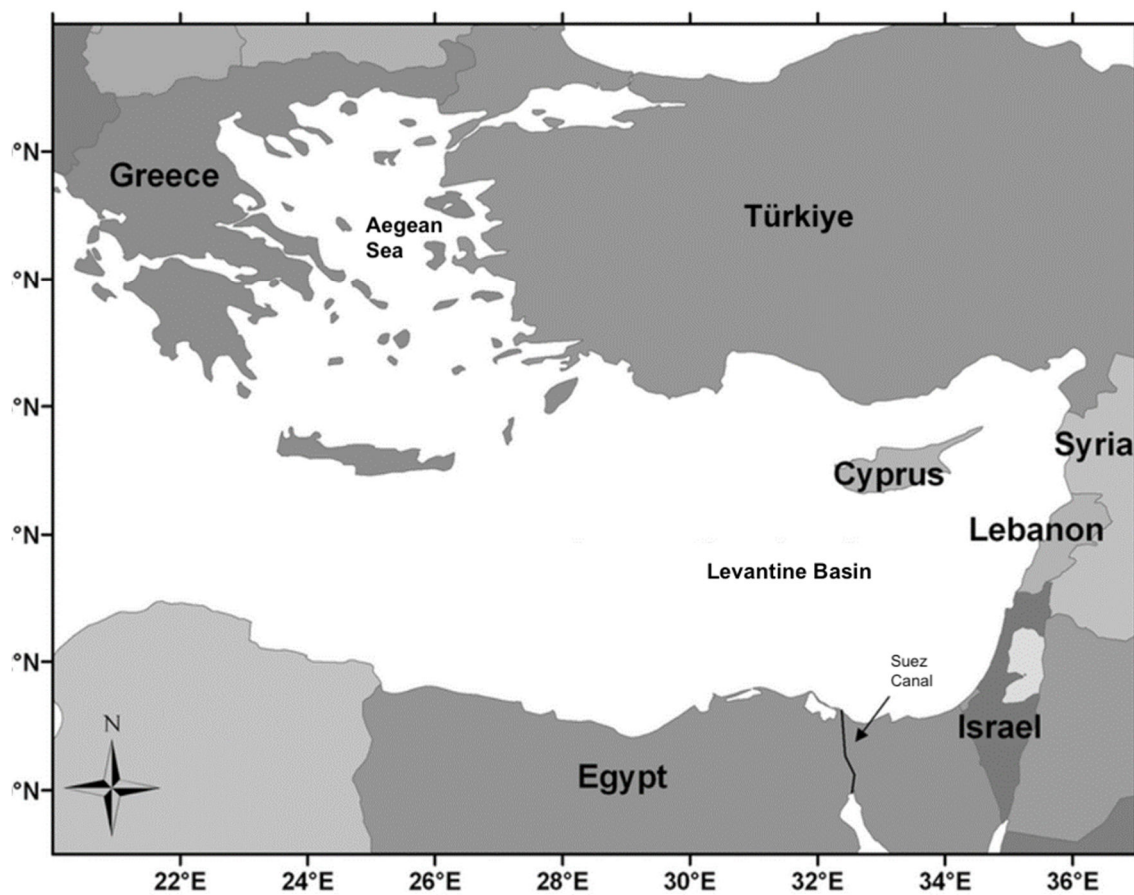
This assessment is prepared for SPA/RAC by Bayram Öztürk, Istanbul University, Türkiye, as selected expert for the Aegean Sea and Levantine Basin Sub-region.

The Mediterranean Sea is one of the marine biodiversity hot spots in the world. The Aegean Sea and the Levantine Basin are situated in the easternmost part of the Mediterranean Sea. It is important in terms of biodiversity of the Mediterranean because the Aegean Sea is connected to the Black Sea through the Turkish Straits System (TSS) while the Levantine Basin to the Red Sea through the Suez Canal. The Levantine Basin is bordered by six countries with different geography from north to south clockwise: Greece , Türkiye, Cyprus, Syria , Israel, Lebanon, and Egypt. Among them Greece and Cyprus are the EU member states, while Türkiye is an EU candidate country. This region has complex and difficult geopolitical peculiarities, which sometimes make it difficult to pursue transboundary cooperation among states.

The Levantine Basin is super oligotrophic in general due to paucity of nutrients with the exception of coastal hot spots, such as Nile Delta. Its biota is changing at the fastest rate in the whole Mediterranean mainly due to Lessepsian migration from the Red Sea. The Aegean Sea and Levantine Basin have been suffering from the invasion of non-indigenous species, fishing impacts, habitat degradation due to pollution and human disturbance as well as climate change in recent years. The Aegean Sea and Levantine Basin contain rich, diverse and unique habitats.

All countries have some of the main key habitats such as seamounts, dark habitats such as underwater caves and canyons, marine vegetation (canopies, forests and sea grass meadows), coralligenous, rhodolith/maerl beds, vermitid terrace and other calcareous bio-concretions, as some singular habitats, such as hydrothermal vents and mud volcanoes. The knowledge on the distribution and condition of some habitats is limited, particularly for coralligenous, rhodolith beds, and dark habitats, while other habitats such as sea grass meadows are relatively well studied. Singular habitats are also poorly known. Nevertheless, this region has special importance because of marine transportation of the Suez Chanel, network of underwater fiber optical cables, sources of the Lessepsian migration, massive tourism movement and fishing ground for small pelagics and highly migratory species.





**Figure 18.** Map of the Aegean Sea and the Levantine Basin

## 2. Methodology

This mid-term assessment focusses on implementation progress of 20 nationally scoped actions stipulated in the Annex III of the Post-2020 SAP-BIO. More specifically, it analyses implementation of start-up activities undertaken by 2025.

This assessment is primarily based on countries' responses to a tailor-made simplified table (questionnaire), which included binary questions, supported with means of verifications, as well as specific questions to identify gaps and challenges encountered for their implementation. More specifically, countries were able to choose from an already proposed set of responses regarding implementation progress, as well as those related to challenges. It should also be noted that for some actions more than one question was posed (more details in **Annex I**).

This approach allows countries to conduct self-assessment and provide indicative updates on the progress of actions in relatively rapid manner. However, it also has its limitations. Primarily, it remains highly subjective. For example, it does not quantify the meaning of pre-selected response options (e.g., what constitutes a sufficient level of progress for an action to be marked as 'yes'), leaving room to countries to interpret assessment of progress differently. This is largely due to lack of quantifiable results (indicators) of the planned actions in the Post-2020 SAP BIO Annex III itself. Nevertheless, the information gathered provides a useful indication of implementation progress, helping to understand both positive and negative developments and propose recommendations for improving implementation.

In early February 2025, SPA/RAC sent the online questionnaire to the Barcelona Convention Focal Points, including those of all seven Aegean Sea and the Levantine Basin countries, with a deadline of 17 days for responses. Feedback has been received from six countries: Cyprus, Egypt, Israel, Lebanon,

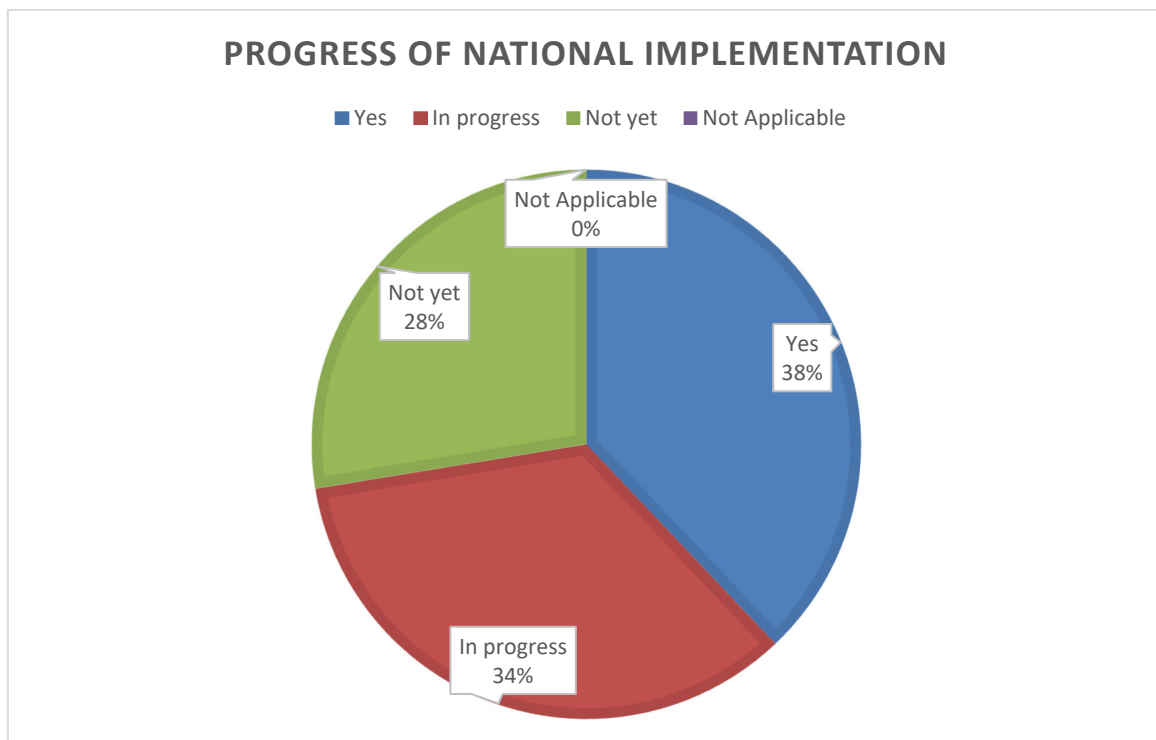
Syria, and Türkiye. Greece has not responded to questions until 26 March 2025 at the time of the preparation of this report, therefore not included in the analysis.

Nevertheless, six out of seven countries have responded, from which we can make preliminary assessment of the Post-2020 SAP-BIO implementation in this sub-region.

### 3. Mid-term Post 2020 SAP-BIO implementation progress

#### 3.1. Actions implementation progress

The Aegean and Levantine Basin countries reported that the majority of actions were successfully implemented (38%) or are still in progress (34%). On the other hand, implementation of approximately one-quarter of actions (28%) has not yet started (**Figure 2**). Such progress is also observed similarly at all the goals.



**Figure 19.** Overview of implementation progress for nationally relevant Post-2020 SAP BIO actions in the Aegean Sea and Levantine Basin sub-region

A more in-depth analysis at the level of individual goals, shows that the most significant progress under **Goal 1 - Reduce the threats to biodiversity** (**Figure 3**) is seen in NIS/IAS related actions, namely capacity (**Action 5**) and identification of vulnerable areas (**Action 6.1**), while the less progress was seen at any other specific actions.

Some countries, but not all, have provided means of verification (examples) of specific positive efforts undertaken within particular actions.

Cyprus, as the only EU country, provided the feedbacks presented documents related to various monitoring and other actions such as the MSFD report (**Action 14**).

In some countries, there is a lack of coordination among ministries and relevant authorities. One example was given by Israel, on the monitoring of NIS (**Action 6.2**), stating that “There is lacking a single biosecurity law or other single law on invasive species, and currently the matter falls in various way on different ministries and agencies, namely: Customs (under the Ministry of Economy), the Ports Authority (under the Transportation Ministry), Agricultural Ministry, Environment Ministry, and the Nature and Parks Authority.”

Regarding **Species recovery, (Action 2)**, one country (Cyprus) reported that there is already in place a strong regulatory framework for the protection of these species in Cyprus and currently more legal measures are under discussions for approval by the Parliament in order to further protect these species from incidental / intentional killing / harassment etc after going through public consultation.

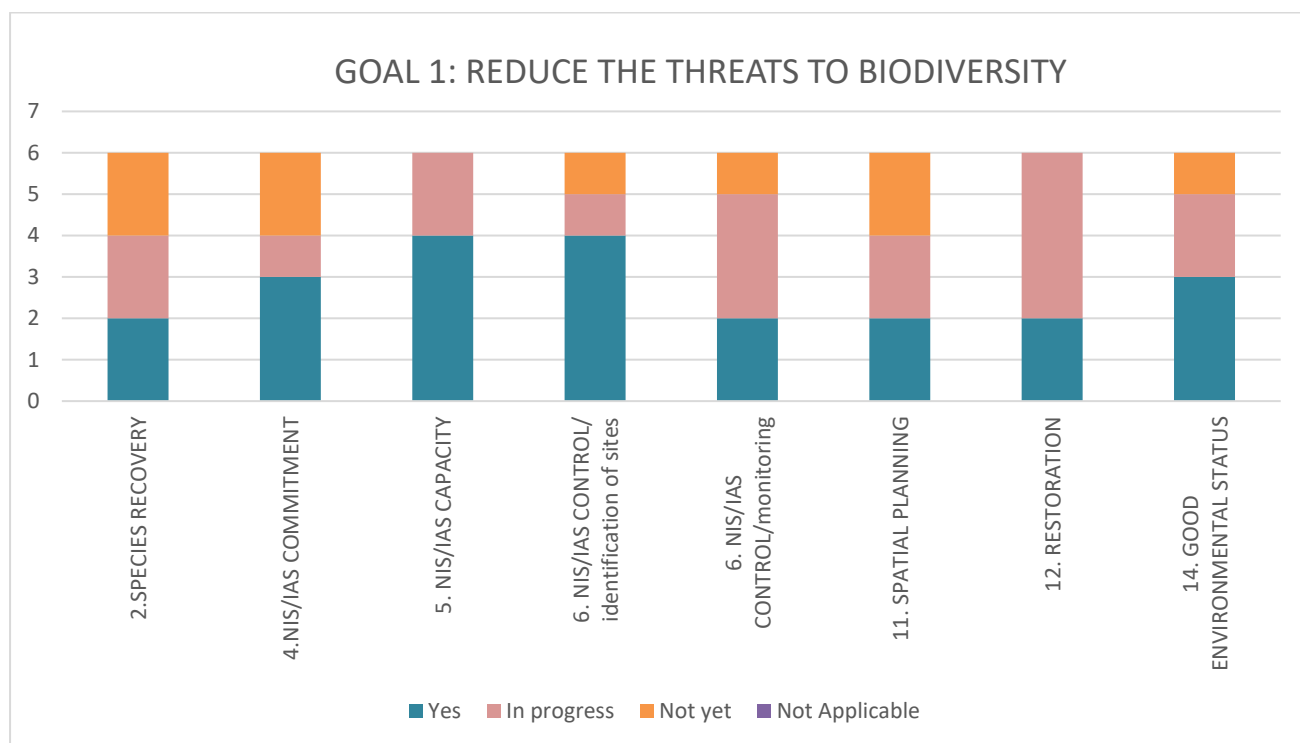
For **NIS/IAS commitments (Action 4)**, two countries have not yet initiated the commitment while others have made some progress as being a member state of IMO.

Furthermore, for **NIS/IAS capacity (Action 5)** baseline studies have been started in all countries in spite of challenges they are facing (later section), which indicates that NIS/IAS is one of the most serious problems in this subregion. This is similar for **NIS/IAS control (Action 6)**, for which most countries reported progress providing verifications and examples.

**Spatial planning action (Action 11)** has been carried out or initiated in four countries. Cyprus and Egypt presented specific verifications.

**Restoration (Action 12)** have been reported by some countries, but not covering all types of key habitats. Some habitat type, Posidonia meadows in particular, has initiated various actions in the relevant countries.

Efforts related to **Good Environmental Status (Action 14)** indicate that the majority of countries have promoted scientific research on biodiversity evaluating Good Environmental Status (GES) within the Ecosystem Approach (EcAp/IMAP) or MSFD requirements.



*Figure 20. Overview of implementation progress for nationally relevant Post-2020 SAP BIO actions in the Aegean Sea and Levantine Basin Sub-region: Goal 1.*

As for **Goal 2 - Ensure that biodiversity is preserved and maintained or enhanced in order to meet people’s needs**, the most significant progress has been done in Stakeholders participation (**Action 29**), followed by Habitats (**Action 19**) and Bycatch (**Action 22**). Implementation of other action shows

equally positive progress, with the least positive progress reported in actions related to Small Scale Fisheries (**Action 23**) (**Figure 4**).

Some countries have also provided means of verification (examples) of specific positive efforts undertaken within particular actions.

Regarding **Invertebrates (Action 17)**, **Habitats (Action 19)**, some countries mentioned their projects to cover these topics. They also indicated there are individual researches in progress or completed. Some countries provided their view about progress with implementation of actions related to fisheries (**Actions 21, 22 and 23**) and it can be said that Bycatch issues have been tackled in most countries, while the coordination of small scale fisheries for the management of MPAs seems to be delayed due to several reasons.

For **Integrating biodiversity (Action 26)**, Cyprus reported the planning process, while others did not provide any verifications.

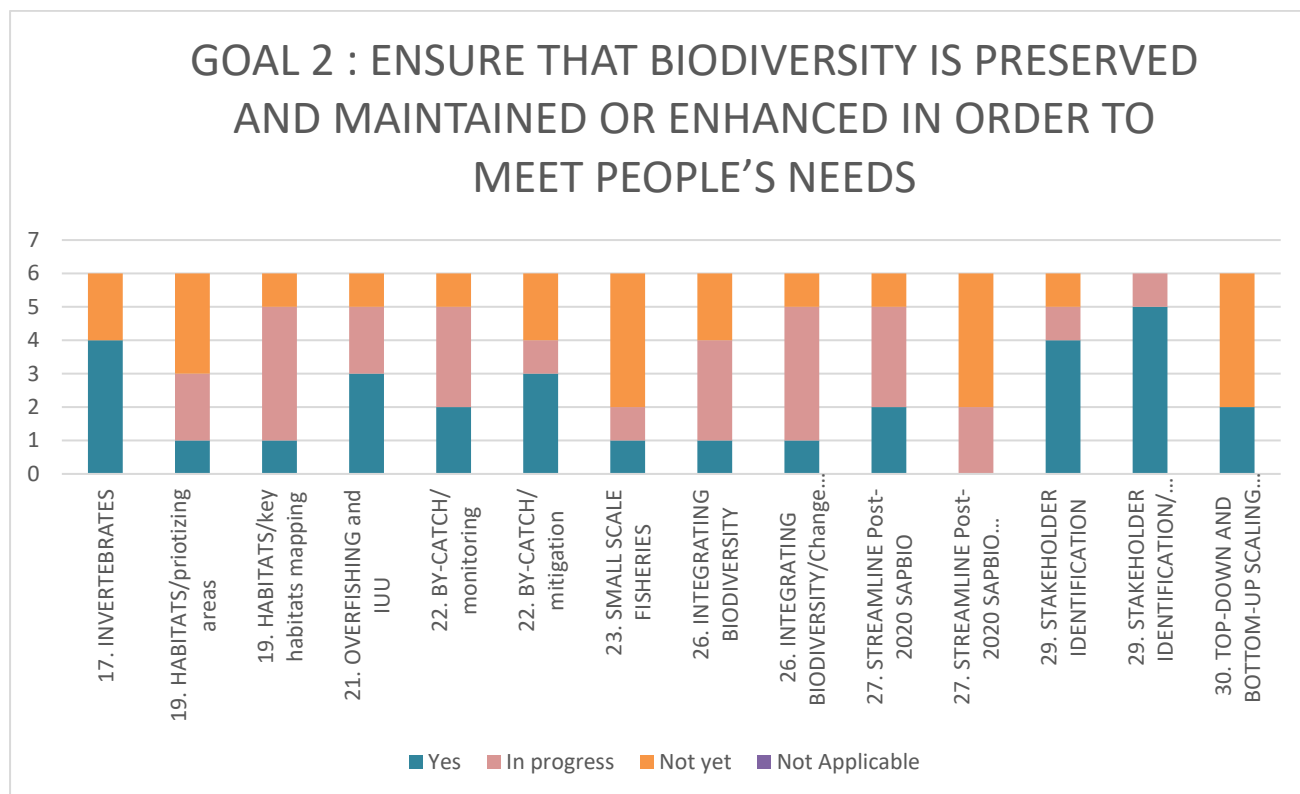
Countries reported positive progress regarding **Streamline Post-2020 SAP BIO (Action 27.1)**, but most of them have not requested and received support to carry out this action. This may not be necessary for some countries, but this feedback should be noted.

**Stakeholders participation (Action 29)** is particularly well managed by most countries, but have not pointed out some concrete means of verification.

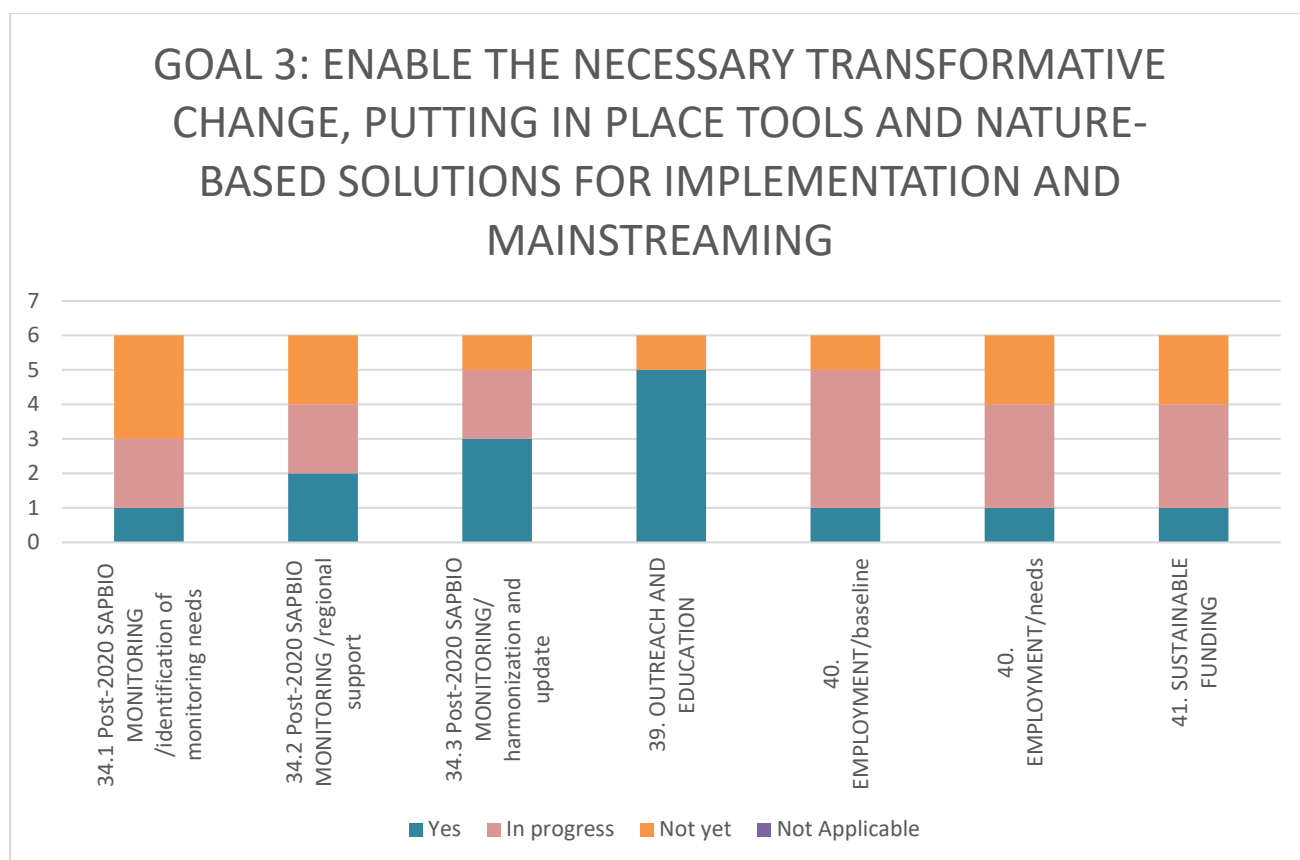
**Top-down and bottom-up upscaling of international commitments (Action 30)**, seem to be not successful in this subregion for variety of reasons (see below section).

Regarding ***Goal 3– Enable the necessary transformative change, putting in place tools and nature-based solutions for implementation and mainstreaming***, the most significant progress has been seen in Outreach and Education (**Action 39**) except Cyprus which stated that it is a small country in terms of population. Overall progress seems quite positive in this Goal.

Actions related to Post-2020 SAP BIO Monitoring (**Action 34**) seems less progressed in some countries and there are quite differences among countries.



**Figure 21.** Overview of implementation progress for nationally relevant Post-2020 SAP BIO actions in the Aegean Sea and Levantine Basin sub-region: **Goal 2.**



**Figure 22.** Overview of implementation progress for nationally relevant Post-2020 SAP BIO actions in the Aegean Sea and Levantine Basin subregion: **Goal 3.**

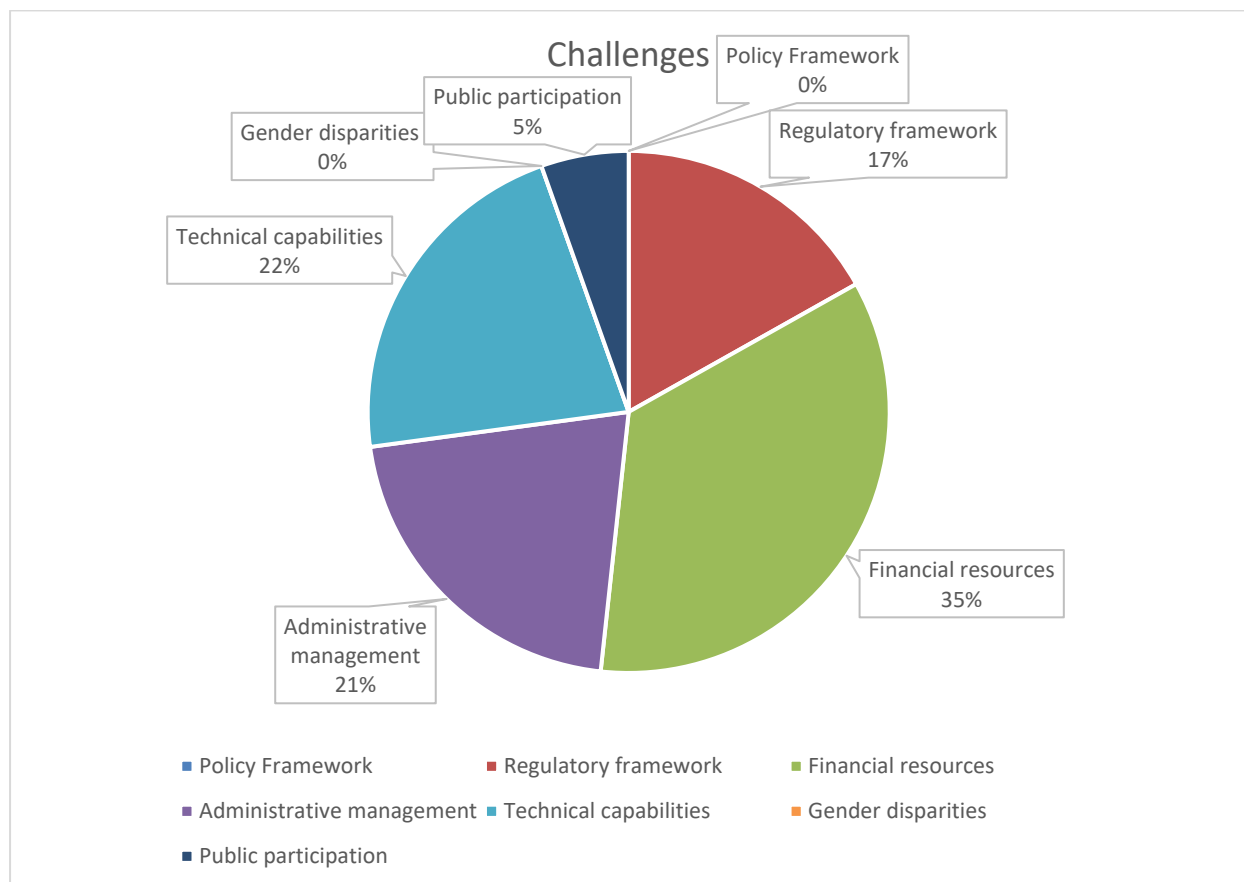
### 3.2. Challenges

All countries identified some challenges and difficulties while reporting their progress in implementing Post -2020 SAP BIO actions.

Overall, the majority of Eastern Mediterranean countries reported challenges related to limited financial resources, technical capacities and administrative management. No gender disparities were reported. Regulatory framework and Policy framework are not major challenges, comprising about a quarter, but significant in some counties. **(Figure 6).**

This trend seen in the general format is consistent in all three goals **(Figure 7)**, with Financial resource being the major challenge in all three goals. There are, however, a few exceptions. For example, in Goal 3, Administrative management is seen as the second challenge after financial resource. In Goal 2, Policy framework is needed in some countries.

As said before, because of the political instability in some countries such as Syria where the country has been settled for peace only recently, many actions are not yet initiated (or stopped) largely due to lack of financial resource.



**Figure 23.** Overview of challenges and difficulties encountered in implementing nationally relevant Post-2020 SAP BIO actions in the Aegean Sea and Levantine Basin sub-region



**Figure 24.** Overview of challenges and difficulties encountered in implementing nationally relevant Post-2020 SAP BIO actions in the Aegean Sea and Levantine Basin sub-region under **Goal 1, 2 and 3.**

## 4. Conclusions and Recommendations

### 4.1. Conclusions

#### Methodology and countries feedback

- The simplified questionnaire, aimed at gathering information from countries about the implementation progress of nationally scoped Post-2020 SAP BIO actions, is a tool that can only provide indicative information and trend about progress.
- This tool relies largely to the subjective interpretation of responses by individual countries and individual ministries in many cases, which is its main limitation.
- The majority of Eastern Mediterranean countries filled the questionnaire. However, only some of these countries provided certain evidence (means of verification) to support their responses about progress in actions. Sometimes the person who filled the questionnaire was not totally responsible for some of the questions, which was reflected in the lack of verifications.

#### Mid-term progress assessment

- The majority of countries indicate the overall **positive progress** in implementing actions, particularly for **Goal 1** - NIS/IAS related actions (**Actions 5 and 6**), **Goal 2** - Stakeholders' participation (**Action 23**), Habitats (**Action 19**) and Bycatch (**Action 21**), **Goal 3** - Education and Outreach (**Action 39**). However, responses for all actions should be taken with some caution for many of the countries, particularly due to lack of means of verification to support responses.
- The **less progress** was reported some actions, such as actions related to the MPA management with small Scale fisheries, but there was no action for which no countries initiated any effort.
- Overall, the EU Member state (only Cyprus in the current report) reported better progress than non-EU Member states, which is linked to requirements of the EU legislation (particularly MSFD), as well as better access to the EU funds
- The major **challenges and difficulties** for effective implementation are limited financial resources, technical capacities and administrative management. These are common in all three goals.
- Political instability causes some delay in actions in this subregion, particularly for Syria, but can be damaging for other states as well.

### 4.2. Recommendations

#### Methodology and countries feedback

- Define as many quantifiable indicators as possible for measure the implementation progress of actions planned in the Post-2020 SAP BIO.
- For further assessments, improve existing questionnaire, to be more comprehensive. The online explanatory video can be useful for national focal points.
- More verification materials are needed and some need to be translated (only summary).



### **Mid-term progress assessment**

#### **For SPA/RAC**

- Encourage countries to focus on improving cooperation with other sectors, including different ministries
- Enhance support to non-EU countries, starting with topics highlighted in the mid-term assessment, such as some NIS/IAS aspects, integrating biodiversity, bycatch, marine habitats conservation.

#### **For countries**

- For non-EU states make better use the benefits available from their EU candidate countries status, particularly the requirements related to conservation of marine biodiversity (such as MSFD etc.) and related funding
- For EU Member States continue investing resources in relevant marine biodiversity conservation activities, using existing legislative and funding tools,
- Further improve technical and other cooperation between countries (particularly between EU and non-EU), needed for addressing transboundary issues such as NIS/IAS, different aspects of migratory species conservation (e.g. mitigation of bycatch) etc. This could include undertaking of joint project, knowledge transfer etc.