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Leaving No One Behind in the Green Transition and Blue Growth

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Abstract

Engagement of local communities and policy coherence across different sectors are essential to ensure that no one is left behind in the green transition. Coastal communities face many challenges that are difficult to adapt to, including those associated with blue growth. In this article, outcomes from two Horizon Europe projects were used to explore barriers to applying the Leave No One Behind (LNOB) principle. A policy coherence framework was applied to assess the level of coherence between policies identified to create conflicts and disempowerment in an Eastern Limassol case study. The coastal community is industrialised yet still supports a diversity of habitats and endangered species. The region is subject to multiple, overlapping EU policy streams, creating policy incoherence and local tensions. The article highlights the blue economy as a paradigm that inevitably will lead to conflicts between ecological, social, and economic priorities, and how the LNOB principle can be essential in bringing these together in a holistic approach. However, there are several limitations to the principle's applicability in the current policy landscape. The main mechanism for equitable transition in the blue economy, the Just Transition, is not applicable under many circumstances, leaving no strict legal framework for implementation of equity and equality in the transition of coastal areas. The mainstream understanding of the blue economy is still dominated by the hope of win-win-win scenarios with limited transparency about the trade-offs and conflicts at stake, and few mechanisms that offer legal consequences.

Keywords

blue growth; blue justice; blue transition; empowerment; just transition; Leave No One Behind; policy coherence

1. Introduction

1.1. Coastal Regions in Blue Transition

Coastal regions are increasingly recognised as strategic arenas for sustainability transitions (Banikoi et al., 2023; Brodie Rudolph et al., 2020). Situated at the interface of land and sea, coastal regions are characterised by dense institutional layering and sectoral overlap requiring simultaneous consideration for ecological values, economic activity, social landscapes, and governance complexity. As sites where multiple sectoral interests converge, coastal zones function as microcosms of broader sustainability challenges, and these challenges are often most visible, and most contested, in coastal settings. To address these challenges, overarching plans for balancing interests coexist with sectoral and environmental laws and policies, including climate strategies, maritime spatial planning frameworks, biodiversity targets, and regional development policies. These are preferably coherently aligned to achieve mutually reinforcing outcomes and to avoid policy interventions contradicting or undermining each other (Platjouw et al., 2024).

The concept of the *blue economy* gained international prominence in 2012 during the United Nations Conference on Sustainable Development (Rio+20), where it was introduced as a marine-focused extension of the more established ideas of the green economy and green growth (Nogué-Algueró et al., 2025). Although the term has become widely adopted, it remains conceptually ambiguous while proving highly useful within policy, academic, and business contexts (Silver et al., 2015; Voyer et al., 2018). The 2012 *Blue Growth Strategy* of the European Commission (2012) was an expression of the blue economy paradigm, and it signalled a key change for coastal areas as newly recognised spaces for enhancing Europe's economic competitiveness. The Blue Growth Strategy received criticism early on. It was framed as compatible with social and environmental goals, but it was primarily an economic strategy enabling capital accumulation (Brent et al., 2020). "Win-win-win" outcomes promoting market-based mechanisms were criticised for being drivers of recasting control of and access to coastal resources from small-scale users to large-scale users while doing little to restore "ocean health" (Barbesgaard, 2018). Instead, calls for different approaches, such as blue degrowth (Ertör & Hadjimichael, 2020; Hadjimichael, 2018), were raised.

In 2021, the European Union (EU) officially made the transition as it replaced its Blue Growth approach with the Sustainable Blue Economy (European Commission, 2021). Nevertheless, the term was still ambiguous, and used in competing, and often conflicting ways, allowing a depoliticisation of the relevant discussions and blurring of power relations at play (Choi, 2017; Voyer et al., 2018). While the rebranding put more focus on the greener aspects of the blue economy, the blue growth criticism that economic transitions in coastal and marine governance are still not shaped by the communities themselves remains (Evans et al., 2023). Even if not in the forefront of the blue strategies, aspects on social fairness within the blue transition are still noticeable in the more recent policy iterations (Giannopoulos & Hoarau, 2026). Incoherent policies continue to advance a model of sustainable development that fails to move away from existing economic and market-based systems, with ecological objectives remaining fundamentally at odds with economic priorities (Nogué-Algueró et al., 2025). This article aims to analyse the blue economy in the EU as a paradigm and how it balances ecological, social, and economic dimensions, with particular focus on how certain social priorities are addressed across the policy objectives and instruments of EU marine governance.

1.2. *The Leave No One Behind Principle and Just Transition*

The academic literature on the relationship between equity, justice, and the oceans has coined several terms for this emerging field, including blue justice, marine justice, ocean justice and equity, and ocean and coastal grabbing (Bavinck et al., 2017; Bennett, 2022; Jentoft et al., 2022). In marine governance policy, however, these terms are scarcely used. Instead, guiding principles are often drawn from broader sustainability frameworks and then applied in marine and coastal contexts (Bennett, 2022).

The “Leave No One Behind” (LNOB) principle is a central commitment of the United Nations 2030 Agenda for Sustainable Development. It recognises that the goals and targets of the Agenda must be achieved for all nations and all segments of society, thus leaving no one behind (United Nations, 2015). Rather than a standalone goal with a separate course of action, LNOB works as an implementation principle to achieve the Sustainable Development Goals (SDGs; United Nations Development Programme, 2018). The principle was incorporated into the 2030 Agenda to highlight poverty, inequality, and the plight of marginalised groups in sustainable development (Mackie & Allwood, 2022). However, it has been most systematically operationalised in social and development policy, with less consistent attention to ecological dimensions in implementation frameworks (Bexell & Jönsson, 2017; Gupta & Vegelin, 2016).

The principle has been embraced by the EU as a key normative reference, notably within its development policy framework, informing broader commitments aimed at addressing exclusion and marginalisation (EU, 2017). Specifically in relation to coastal communities, some work has examined how LNOB is implemented in practice, drawing on empirical experiences from participatory transition experiments. EmpowerUs (2025a) shows that putting the LNOB principle into practice in coastal communities depends strongly on local conditions and requires ongoing discussions about who should be included, how decisions are made, and how both burdens and benefits are shared, often involving difficult trade-offs between people, livelihoods, and the environment. EmpowerUs (2025b) finds that community-led, bottom-up initiatives can help make LNOB meaningful in practice by supporting local participation and ensuring that coastal communities benefit from transition processes; however, these efforts require long-term policy commitment and sustained funding support to have lasting impact, as also highlighted in broader work on community-based and participatory environmental governance (Di Franco et al., 2020; Van Bussel et al., 2020).

Coastal communities face a range of interconnected challenges linked to increasing pressures from blue growth (including competition over space and resources), expanding urban development and tourism, and changes in access to and viability of traditional livelihoods and cultural practices (Bennett, 2022). These dynamics raise important questions about how, and for whom, LNOB is being realised in marine and coastal settings (Breil et al., 2021).

In response to these challenges, approaches such as enhanced engagement of local communities and efforts to improve policy coherence across sectors are often promoted as ways to support more just sustainability transitions. However, empirical work on LNOB implementation in coastal and transition contexts suggests that the principle is enacted through diverse and context-specific mechanisms, rather than through a single policy instrument or legal formulation (EmpowerUs, 2025a, 2025b). In legal frameworks, these mechanisms are rarely labelled explicitly as LNOB, but instead appear across provisions related to governance

arrangements, participation, funding, territorial targeting, and socioecological safeguards (de Jong & Vijge, 2025; Mackie & Allwood, 2022; United Nations Sustainable Development Group, 2022). This creates a methodological challenge for assessing LNOB in legal texts and motivates the analytical approach adopted in this study.

2. Research Design and Methodology

This article draws on outcomes from two Horizon Europe sister projects to explore realities on the ground and barriers to applying the LNOB principle in coastal governance. It applies the Policy Coherence Framework developed in the CrossGov project and builds on empirical insights from the EmpowerUs project, which focuses on community-based engagement in coastal transitions. The analysis focuses on LNOB aspects of the case and policies involved, using the analytical categories described below.

2.1. Policy Coherence as an Analytical Lens for LNOB

The Policy Coherence Framework (Table 1) is used to examine the extent to which relevant marine policies reinforce or undermine each other, and how policy coherence, or the lack thereof, contributes to conflicts and disempowerment in coastal communities. Related EmpowerUs outputs analyse the empowerment of local communities and actors in coastal transition, including Sørensen et al. (2025) and Antonova et al. (2025). Integrating insights from both projects yields the article's core proposition: LNOB failures in the blue economy

Table 1. The Policy Coherence Framework (Platjouw et al., 2025) enables systematic identification of where policy coherence challenges arise across the policy cycle and governance levels. Part A assesses the degree of policy coherence by examining coherence attributes, such as the alignment of policy objectives and measures (depicted in the table). Part B, which is not depicted in the table, examines the sources of (in)coherence by analysing explanatory factors including governmental organisational structures, science-policy-society interfaces, and stakeholder involvement mechanisms. The empirical material used in this study does not permit the application of Part B.

Coherence Assessment	
Element	What is assessed
Policy objectives	Alignment and potential conflicts between policy objectives, including: - Whether objectives are mutually supportive or contradictory; - Whether objectives are aligned substantively, geographically, and temporally; - Differences in legal status (e.g., binding obligations vs obligations of best effort) and the implications of exemptions; - Whether objectives cross-reference overarching ambitions.
Policy measures (instruments)	Interactions between policy measures and objectives, including: - Whether measures support or undermine the achievement of the policy's own objectives; - Whether measures affect the achievement of objectives in other policies; - Whether some measures are more influential than others due to legal status, enforceability, or available resources; - Where interactions between measures create trade-offs or allow synergies to be pursued.

often occur where policy incoherence produces disempowerment, for example, by constraining meaningful participation, obscuring accountability across governance levels, or distributing risks and benefits unevenly. The analytical framework therefore directs attention to the governance structure through which trade-offs between ecological, social, and economic priorities are managed.

The combination of the projects offered a rare opportunity to apply a framework developed through a predominantly top-down policy analysis process in the CrossGov project (Platjouw et al., 2025) to empirical insights generated through community-based engagement and participatory methods in the EmpowerUs project. Policy coherence is understood as the extent to which policies reinforce each other by promoting synergies or reducing conflicts between their objectives and instruments, both in design and implementation (Platjouw et al., 2024).

The analysis proceeds in two steps. First, policy objectives are examined to determine whether they are aligned, overlapping, or contradictory across the selected policy set. Attention is given to whether social considerations and concrete dimensions relevant to the LNOB principle (see Section 2.3) are included, and if so, consistently integrated across policies governing aquaculture and coastal communities. Second, policy instruments are analysed to assess whether implementation mechanisms support coherent governance. Coherence is evaluated by examining whether instruments operate in isolation or whether they create shared or mutually supportive implementation structures across policies. Instruments are understood as the concrete measures adopted to implement policy objectives, such as regulations, incentives, planning requirements, or monitoring obligations (Platjouw et al., 2025).

2.2. Case Study and Participatory Approach: The Eastern Limassol Transition Coastal Lab

The coherence analysis is applied through a case study drawn from the Cyprus Transition Coastal Lab (TCL) examined in the EmpowerUs project. A key feature of the EmpowerUs project was the establishment of six TCLs, understood as living labs in different coastal regions where stakeholders worked together to identify local challenges, co-design nature-based and social solutions, and pilot interventions.

In Cyprus, the TCL focused on the Eastern Limassol region. Through participatory workshops and in situ discussions with residents, businesses, and policymakers, the Cypriot TCL developed a Strategic Community Development Plan (“Kavo Dolos”) that sought to integrate ecological, social, and economic values into local coastal planning. The pilot aimed to strengthen local capacity and ownership in shaping sustainable coastal futures by enhancing ocean literacy, social innovation, and community collaboration, with solutions designed to be locally rooted, inclusive, and environmentally sound.

The Community Development Plan resulted from a community-driven socioecological approach to coastal planning intended to align the priorities identified by the participating communities. Following two EmpowerUs participatory workshops, an engagement plan was designed to involve both community members and key users of the marine and coastal environment. To broaden participation beyond local stakeholders and reach the wider public, a survey invitation was disseminated via posters and digital channels. The survey provided an important opportunity to gather information on residents’ relationships with the coastal area, while capturing their perspectives and expectations regarding the future development of the coastal strip.

Two public consultations were also organised in the communities of Pentakomo and Monagrouli. These meetings aimed to present the pilot initiative, outline available funding opportunities, and discuss its potential benefits, while ensuring that potential outcomes were aligned with community needs and expectations. Hosted by the respective Community Councils, the consultations incorporated interactive voting tools to enable participants to prioritise proposed projects and programmes. The meetings also facilitated broader discussions on long-term challenges faced by the villages.

Eastern Limassol constitutes a particularly relevant case for examining policy coherence, as the area is characterised by competing ecological and economic priorities, as well as differing values and perceptions among local communities and wider users of the marine environment. The case study focuses on the development of aquaculture activities and on the policy objectives and instruments governing such development.

2.3. Analytical Categories for Assessing LNOB in Legal Frameworks

To operationalise the screening of legal texts for consideration of the LNOB principle, we developed a set of eight analytical categories. These categories translate LNOB from a broad normative commitment into a series of concrete dimensions that can be identified in legal language. The categories were derived inductively through a comparative synthesis of four key sources selected because they examine how the principle is translated into governance arrangements, policy instruments, and practical mechanisms across global sustainable development and just transition contexts (de Jong & Vijge, 2025; EmpowerUs, 2025a, 2025b; Mackie & Allwood, 2022).

The synthesis revealed that LNOB is enacted through multiple, partially overlapping mechanisms, ranging from governance arrangements and policy coherence tools to financial instruments, participatory procedures, territorial targeting, and socioecological safeguards. The categories function as an analytical lens through which legal texts can be examined, without presupposing explicit reference to LNOB terminology.

Governance, roles, and coordination captures whether and how legal texts establish institutional responsibility and coordination mechanisms relevant to LNOB. De Jong and Vijge (2025) emphasise that LNOB is unlikely to be institutionalised in the absence of clear governance arrangements, including cross-sector coordination and explicit assignment of responsibility. Similarly, Mackie and Allwood (2022) highlight governance coherence as a prerequisite for ensuring that commitments to inclusion are not undermined by fragmented policy action. This category refers to provisions that clarify which authorities are responsible for LNOB-relevant action, how responsibilities are distributed across institutions or governance levels, and whether coordination across sectors is required.

Policy integration addresses the extent to which LNOB-relevant concerns are integrated across the legal instrument. Across the literature, LNOB is framed as a crosscutting principle that must be mainstreamed into policy processes rather than addressed through isolated or symbolic measures (de Jong & Vijge, 2025; Mackie & Allwood, 2022). This category captures provisions such as crosscutting objectives, consistency clauses, or requirements to assess social, territorial, or distributional impacts of policies. Legal texts may thus reflect LNOB considerations implicitly through mechanisms that promote coherence, even in the absence of explicit LNOB language.

Accountability, monitoring, and evidence focuses on whether legal texts include mechanisms to assess differential impacts and track who benefits and who does not. Both de Jong and Vijge (2025) and Mackie and Allwood (2022) stress that LNOB presupposes the availability of evidence on inequalities, including through monitoring frameworks, reporting obligations, and disaggregated data. This category therefore includes provisions related to evaluation, review, data collection, and reporting, which enable assessment of whether legal measures disproportionately advantage or disadvantage specific groups or places.

Finance and resource allocation captures the extent to which LNOB-relevant objectives are linked to concrete financial commitments or resource allocation mechanisms. A recurring finding across the analysed sources is that LNOB risks remaining aspirational without dedicated or prioritised funding (de Jong & Vijge, 2025; Mackie & Allwood, 2022). In more applied transition contexts, EmpowerUs (2025b) further highlights the role of instruments such as the Just Transition mechanism in operationalising LNOB through long-term financial support. Legal provisions that earmark funding, prioritise access to financial instruments, or link objectives to resources are therefore central to this category.

Meaningful participation concerns procedural inclusion; that is, whether legal texts provide for meaningful participation of affected groups in decision-making processes. Participation is a well-established principle in development and environmental governance, but not all participation is equally inclusive or effective. De Jong and Vijge (2025) and Mackie and Allwood (2022) stress the importance of institutionalised participation and the involvement of civil society organisations, while EmpowerUs (2025a, 2025b) demonstrates the need for context-specific and multimethod engagement to avoid exclusion and participation fatigue. This category therefore captures procedural justice dimensions.

Territorial inequality and place-based measures reflect the recognition that LNOB applies not only to individuals and social groups, but also to *places and territories*. Mackie and Allwood (2022) highlight territorial inequalities as a persistent feature of development policy, while EmpowerUs (2025a, 2025b) explicitly frames LNOB in relation to coastal, peripheral, island, and remote regions. This category therefore includes legal provisions that target specific territories, recognise geographic disadvantage, or introduce differentiated measures for marginalised regions.

Livelihood and economic justice addresses whether legal texts consider distributional effects on livelihoods and economic practices, particularly those vulnerable to structural change. EmpowerUs (2025a) emphasises that LNOB in transition contexts must account for the protection of traditional and small-scale livelihoods, as well as associated cultural identities and practices. EmpowerUs (2025b) similarly highlights mechanisms aimed at retaining economic benefits locally and preventing the displacement of communities by dominant sectors. Legal provisions that address livelihood protection, benefit distribution, or mitigation of economic losses are therefore captured under this category.

Socioecological and ecological safeguards capture an expanded understanding of LNOB that explicitly links social justice with ecological integrity. EmpowerUs (2025a) argues for the inclusion of “leaving no ecologies behind” as an integral component of just transitions, highlighting tensions and trade-offs between environmental protection and social or economic objectives. EmpowerUs (2025b) similarly frames coastal transitions as socioecological processes. This category includes legal provisions that integrate ecological protection with social safeguards or recognise human wellbeing as embedded within socioecological systems.

Table 2. Analytical categories for screening legal texts for consideration of the LNOB principle.

LNOB category	What is expected to be found in the legal text
Governance, roles, and coordination	Legal text clearly assigns responsibility for LNOB-relevant action; it specifies how different authorities or sectors are expected to coordinate to address it.
Policy integration	Legal text shows that LNOB-related concerns are considered throughout the policy, for example through objectives, consistency requirements, or impact assessments, rather than treated as a standalone issue.
Accountability, monitoring, and evidence	Legal text includes mechanisms to monitor, assess, or review who is affected by the policy, making it possible to identify who benefits and who is disadvantaged.
Finance and resource allocation	Legal text links LNOB-related objectives to concrete funding, financial support, or mechanisms for resource allocation.
Meaningful participation	Legal text provides for meaningful participation of those affected by the policy in decision-making processes, rather than providing participation only after decisions have been made.
Territorial inequality and place-based measures	Legal text recognises that some regions face disadvantages and includes measures that take these territorial differences into account.
Livelihood and economic justice	Legal text considers how livelihoods and economic activities are affected, particularly those that are at risk due to change.
Socioecological and ecological safeguards	Legal text recognises that social wellbeing and environmental protection are interconnected and includes safeguards to prevent measures from harming people or communities.

Sources: Adapted from de Jong and Vijge (2025); EmpowerUs (2025a, 2025b); Mackie and Allwood (2022).

3. Eastern Limassol Case Study: Contested Blue Economy Development and Marine Aquaculture Expansion

Not all aspects of the EmpowerUs participatory process in the Eastern Limassol TCL unfolded as anticipated. During the implementation of the EmpowerUs project, significant debates emerged regarding the proposed development of marine aquaculture and the designation of a Natura 2000 site within the TCL area, both of which were initially opposed by the local communities. In particular, the proposal to construct an industrial marine aquaculture harbour during the development of the Cape Dolos Strategic Community Development Plan intersected with the EmpowerUs participatory process and contributed to a degree of mistrust toward official institutions, such as the Department of Fisheries and Marine Research and the Department of Environment who are responsible for the development of marine aquaculture (EmpowerUs, 2025c; Sørensen et al., 2025).

The concept of the blue economy gained prominence in Cyprus after the Limassol Declaration, a European agenda adopted in 2012 for creating growth and jobs in the marine sectors. Cyprus has historically not been involved in a broad range of blue economy activities, with coastal tourism, shipping, and marine aquaculture being the main blue economy sectors (European Commission, n.d.). Experimental marine aquaculture began in the 1970s, but the first commercial open-sea cage farm was not established until 1989. Marine aquaculture has since become a key blue economy activity in Cyprus.

In 2014, the Department of Fisheries and Marine Research in Cyprus published the Long-Term National Strategic Plan for Aquaculture 2014–2020, which proposed the creation of two Aquaculture Zones. One zone's location remained to be determined, whereas the other was to remain in the Vasiliko–Moni area, which hosted 75% of marine aquaculture facilities in the Republic of Cyprus. In the Strategic Plan, this was stated to be a “natural development for that area.” Complementary land-based infrastructure would be required to support the expansion of the zone, as the infrastructure used was part of the Vasilikos Energy Centre, which was expanded following the discovery of hydrocarbon reserves in the Exclusive Economic Zone of the Republic of Cyprus in 2011. A location for new marine aquaculture land and port facilities was proposed for Pentakomo, a village in the Vasiliko-Moni area.

The proposed relocation of the land-based infrastructure and the new marine aquaculture harbour, within the administrative limits of the community, prompted backlash from environmental non-governmental organisations (ENGOS) and the local community, as the construction of the harbour was considered to conflict with conservation objectives both at national and EU levels, whilst impacting the community's potential for tourism development. ENGOS grounded their concerns in the area's importance as a feeding ground for the Mediterranean monk seal (*Monachus monachus*). They also pointed to the area's mosaic of important natural habitats of community interest, which are listed in Annex I of the Habitats Directive (92/43/EEC). One of these habitats is designated as a priority habitat. The Mediterranean monk seal is listed in the *Red List of Threatened Species* of the International Union for Conservation of Nature as a “vulnerable” species on a global level (Karamanlidis et al., 2023).

The ENGOS requested that a Special Ecological Assessment (Appropriate Assessment) be conducted because the marine aquaculture harbour was considered “likely to have implications for the site in view of the site's conservation objectives,” in accordance with the requirements of Article 6(3) of the Habitats Directive (Nicolaou, 2024). This was linked to an ongoing process that began with the restoration of a sea cave used by the monk seal. The restoration led to the designation of a marine protected area in accordance with the national Fisheries Law in 2022 (Κ.Δ.Π. 499/2022 and Κ.Δ.Π. 47/2023). The designation of a Special Area of Conservation according to the Habitats Directive has remained pending since then. This delay in the designation and the finalisation of the boundaries of the Natura 2000 site has complicated the debate. ENGOS filed a case against the planning permit for the marine aquaculture harbour, raising several concerns, including the delay in designating the boundaries of the site, failure to assess possible impacts on priority species and habitats (monk seal and *Posidonia oceanica*) and thus failure to comply with the aforementioned Article 6(3). During the finalisation of this article, the Administrative Court dismissed the case on procedural grounds, finding that it had been filed out of time, a decision which prompted concern among the ENGO community, as well as other legal experts (BirdLife Cyprus, 2026; Chatziagianni, 2026).

Conflicts are intrinsic to blue economy planning processes. The ambiguity of the blue economy can create or exacerbate conflict and lead to harmful practices (Germond-Duret et al., 2022; Voyer et al., 2018). Addressing these tensions requires transparency in decision-making, the explicit identification of contested issues, locations, and proposals, and a commitment to open and meaningful dialogue about ongoing developments. Such practices are essential even in situations where communities and other stakeholders remain dissatisfied with proposed interventions.

4. Understanding the Policy Landscape

4.1. Introduction and LNOB in an EU Context

Policy objectives originating at the global level, such as the United Nations' SDGs, undergo a process of translation, specification, and institutionalisation as they are implemented within regional governance frameworks and in a supranational context such as the EU. Objectives are intentionally framed at a high level of abstraction to allow flexibility in interpretation and implementation across diverse political and socioeconomic contexts (Mustajoki et al., 2022). The LNOB principle will have undergone change when, and if, it has been implemented in an EU context and in relation to marine and coastal resources. Within the EU, the global sustainability goals are embedded in existing policy architectures, where they are balanced against regional priorities, legal competences, and sectoral strategies.

The EU has committed itself to achieving both the SDGs and LNOB (Mackie & Allwood, 2022). The most explicit implementation of the LNOB principle within the EU is the Just Transition, a mechanism designed to ensure a socioeconomic transition that is fair, inclusive, and leaves no one behind through financial instruments. For situations other than low-carbon economy, the implementation of the principle is less obvious, giving it little to no relevance to the situation in the Eastern Limassol case.

The spatial arrangements of the marine and coastal areas in Eastern Limassol attempt to reconcile economic development, environmental protection, and social priorities in the allocation of limited marine space and resources. In the following, the mechanisms for implementing LNOB within the relevant policies for the Eastern Limassol case will be identified and analysed for policy coherence. For the Eastern Limassol case, the central policies have been identified as the Habitats Directive, the Maritime Spatial Planning Directive (MSPD; 2014/89/EU), the Environmental Impact Assessment (EIA) Directive (2011/92/EU), and the EU Blue Growth Strategy.

The Habitats Directive constitutes a cornerstone of EU nature conservation law and plays a decisive role in regulating aquaculture in ecologically sensitive coastal areas. Through the establishment of the Natura 2000 network, it imposes obligations to prevent deterioration of protected habitats and disturbance of species. This introduces a precautionary and conservation-oriented logic into coastal development, often constraining the spatial expansion or operational conditions of aquaculture.

Complementing this ecological focus, the MSPD provides a framework for the coordinated allocation of maritime space among competing uses, including aquaculture, fisheries, shipping, and conservation. By requiring member states to develop maritime spatial plans, the Directive seeks to reduce user conflicts and promote sustainable blue growth. For aquaculture, this translates into a more strategic approach to site selection and licensing, where production must be integrated into broader spatial priorities and ecosystem-based management principles.

The EIA Directive applies to individual projects by assessing their environmental impact. Aquaculture installations, particularly those of significant scale, may trigger EIA requirements, necessitating the evaluation of impacts on water quality, biodiversity, and local communities. The Directive embeds procedural safeguards, including public participation, thereby opening decision-making processes to scrutiny and potentially influencing project design or approval outcomes.

The EU Blue Growth Strategy is a strategic policy aimed at fostering economic development in the marine and maritime sectors, with aquaculture identified as a key growth area (European Commission, 2012). Adopted in 2012 for the 2014–2020 period, the strategy provided a clearer strategy for the blue economy. Unlike other policies analysed, the strategy was not a legally binding directive. However, its objectives were implemented in major financial support mechanisms for projects such as the European Maritime and Fisheries Fund (EMFF; 2014–2020; 508/2014/EU).

4.2. Policy Objective Coherence

The policy objective analysis examines the coherence between the objectives across policies. The approach includes identifying objectives that advance or conflict with the LNOB categories identified in Section 2.3 to explore the vertical coherence between the objective of LNOB and EU policies relevant to the Eastern Limassol introduced in the previous section. Further, the analysis will assess the horizontal coherence by exploring the level of alignment between the policies.

The Habitats Directive includes three explicit objectives in its Article 2. The first two constitute the core of the Directive and establish ecological conservation for habitats and fauna and flora as the aim of the Directive. The Directive does not aim at achieving social advancement. However, the third objective is a complementary objective limiting the conservation obligation and relating to other societal objectives. It states that measures taken pursuant to the Directive “shall take account of economic, social and cultural requirements and regional and local characteristics.” Together, this provision and the absence of objectives directly conflicting with LNOB give the Directive’s objectives a high coherence score.

The MSPD objectives focus on what the planning process is to achieve, including all dimensions of sustainable development, and establish that “Member States shall consider economic, social and environmental aspects to support sustainable development” when establishing and implementing maritime spatial planning (Art. 5.1). Overall, the objectives focus on economic activities, several of which are listed in the second objective (Art. 5.2), and economic growth in the maritime sector (Art. 5.1). This is an attempt at achieving a “win-win-win” scenario, but with a clear emphasis on economic activities and growth.

The objective of the EIA Directive is to ensure that the environmental effects of those public and private projects which are likely to have significant effects on the environment are properly assessed (Art. 1.1). Notably it does not include any explicit objectives relating to social justice or other LNOB-relevant issues, but the proper assessment of environmental impacts of projects is a prerequisite for the achievement of socioecological safeguards even if not explicitly stated. The Directive refers to the UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention) in its preamble. The Aarhus Convention aims to lay down a set of basic procedural rights for the public, impose obligations on public authorities to make these rights effective, increase transparency, and make governments more accountable to the people. All member states are parties to the convention, and the EU has incorporated it into its environmental directives.

The Blue Growth Strategy declares the sea and the coasts as potential drivers of the economy and aims to promote sustainable economic growth, innovation, and jobs in the marine and maritime sectors. Protection of the marine environment is recognised as important to preserve ecosystem services. The strategy identifies

economic growth as having potential for social advancement, but none of the objectives relate to the concrete dimensions of LNOB.

Table 3. Identified policy objectives relating to LNOB.

Policy	Policy objectives related to LNOB
The Habitats Directive	Measures shall take account of economic, social, and cultural requirements and regional and local characteristics.
The MSPD	Member states shall consider economic, social, and environmental aspects to support sustainable development and growth.
The EIA Directive	No explicit LNOB-related objective.
The Blue Growth Strategy	No explicit LNOB-related objective.

The four policies' objectives are generally poorly aligned with LNOB principles, but this is expected: these policies were adopted before, or in parallel with, the consolidation of LNOB within the SDG framework, and build on environmental and sectoral governance traditions in which social justice concepts have played a marginal role. This points to both a temporal lag and a disciplinary gap, as environmental and blue economy policies tend to draw more heavily on natural science and economic expertise than on social science perspectives that foreground inequality, vulnerability, and justice (Bennett, 2019; Schlosberg, 2013). None of the policies refer to LNOB directly and several lack objectives that speak to the concrete dimensions of LNOB. For the EIA Directive, this absence does not seem to directly contradict any of the LNOB categories and can nevertheless support socioecological safeguards. For the Blue Growth Strategy, the absence of an overarching commitment to social justice or references to specific LNOB categories is more concerning given its role in guiding financial commitments and resource allocation. Incorporating such perspectives into decisions regarding financial commitments or resource allocation mechanisms is essential to ensuring that no one is left behind; their omission conflict with the overarching objective. The Habitats Directive and the MSPD include objectives with broad normative commitments that acknowledge social aspects in planning and environmental protection, yet these remain general and provide limited guidance on how to achieve LNOB.

Overall, the policy objectives offer little direction on how LNOB is to be realised within the identified policy cluster for the Eastern Limassol case, resulting in a low level of LNOB policy integration. Responsibility for integrating principles such as LNOB and social justice is shared across policy communities, requiring that central coordinating bodies, environment and sectoral ministries, and social policy actors work together to embed distributive and procedural justice concerns in environmental and blue economy legislation.

4.3. Policy Instrument Coherence

In addition to analysing the alignment across the objectives of the policies, the coherence assessment also addresses policy instruments. Policy instruments are analysed with a view of exploring how they are designed to contribute towards the overarching objective analysed (LNOB). The interlinkages and coherence of the policy instruments in the policy clusters will be examined.

The Habitats Directive uses the protection of areas as its policy instrument, and the EU is to set up a coherent ecological network of special areas of conservation (Natura 2000; Art. 3.1). The member states are

to designate sites as special areas of conservation, such as the habitat for the Mediterranean monk seal. The designation of these areas considers neither social *nor* economic factors. Only ecological factors are allowed to be considered, as is evident from the Lappel Bank case (C-44/95). Such considerations may be taken under certain circumstances in the permitting (appropriate assessment) of projects within, or that could affect, a designated area. Projects that risk adversely affecting the integrity of the site concerned may only be allowed to be carried out for reasons of imperative public interest (Art. 6.4).

The MSPD uses plans as its policy instrument. The plans are required to consider the objectives set out in Article 5(1), including all dimensions of sustainable development and growth. It is up to the member states to determine how the different objectives are reflected and weighted in their maritime spatial plans. This leaves the legal impact of the policy instrument in the hands of the member states at the transposition and implementation phases of the Directive. The instrument is potentially an effective tool to integrate LNOB aspects in coastal environments. However, it has proven to be challenging because, in many countries maritime spatial plans are used to drive economic uses of the sea rather than the protection of the seas (Sander, 2024).

As noted, the EIA Directive does not have an explicit objective related to LNOB. However, the inclusion of the Aarhus Convention implies that aspects connected to the category of meaningful participation are implemented. These are included in Article 6 of the Directive, ensuring effective participation of the public by access to information early in the decision-making procedures. In accordance with Article 1.4 of the Aarhus Convention, the term “public” refers not only to natural or legal persons but also to associations, organisations, or groups. However, assessments are mandatory only for projects likely to have significant effects on the environment (Art. 2.1). The Aarhus Convention is further implemented in two other EU directives—the Access to Environmental Information Directive (2003/4/EC) and the Public Participation Directive (2003/35/EC).

Analysing the Blue Growth Strategy is different, as the policy does not contain any policy instruments. However, the strategy is supported by various funds, including the EMFF, active in 2014–2020, which planned to spend €1.72 billion on the aquaculture sector (Guillen et al., 2019). EU countries developed Multiannual National Strategic Plans for the promotion of sustainable aquaculture, proposing concrete actions to address these strategic priorities. The plans were a prerequisite for access to the aquaculture part of the EMFF in accordance with Annex IV of the EMFF regulation (508/2014/EU). In the multiannual plans, member states quantified objectives (e.g., production growth) for their domestic aquaculture sector based on the strategic priorities and the EMFF funds received (Guillen et al., 2019). The fund did operationalise certain LNOB elements, mainly finance and resource allocation, territorial inequality and place-based measures, and livelihood and economic justice, for example by providing funding for small-scale fisheries, local development through Fisheries Local Action Groups, and support for coastal and fishing-dependent communities. Such investments can have both beneficial and detrimental effects (Bugeja-Said et al., 2022). The Eastern Limassol case illustrates how focus on growth can override the interest of the local community.

Overall, it is difficult to identify how social dimensions are integrated into the policies and how and when trade-offs are made to achieve them. Systematic relation between the policies in relation to social dimensions is seemingly non-existent, as there are no shared processes, cross-references, or other tools to balance interests and make trade-offs. None of the analysed policies have even an LNOB-adjacent idea as part of its core logics. Instead, LNOB has been added at a later stage as an outer logic without a willingness

to compromise the established inner logic (Kyrönviita et al., 2024). The lack of a coherent approach to social dimensions in the legal system will likely lead to the measures in place being less effective in fulfilling the LNOB objectives.

5. Conclusions

Even though social aspects of the EU blue economy have been called for and partly implemented, it undoubtedly remains the least developed sustainability dimension of the current EU Sustainable Blue Economy Strategy. The LNOB principle has been launched as a commitment to equity and equality, which the EU has embraced in its marine-related strategies. However, it has been less clear how and to what extent the principle has been implemented in the governing policies.

The Eastern Limassol case study reveals several limitations in the principle's applicability in the current policy landscape. Foremost, the main mechanism for equitable transition in the blue economy, the Just Transition, is not applicable under many circumstances, including those in the case study. A corresponding mechanism for activities such as aquaculture does not exist, making it difficult to pinpoint how this just transition should be implemented.

There is no strict legal framework for the implementation of equity and equality in the transition of coastal areas. Many of the policies, such as the Habitats Directive, were in place long before the LNOB principle and lack substantive legal mechanisms concerning social aspects of plans and projects. Further, the case study showcases the ongoing effects of previous efforts as projects originating under the Blue Growth Strategy remain under development.

Instead of substantive mechanisms, LNOB is expected to be realised primarily through public participation enabled by environmental impact assessment and maritime spatial planning processes. Public participation through the environmental impact assessment process is an important procedural right, but it is limited in terms of legal influence and does not amount to a right of communities to decide how natural resources are used. Maritime spatial planning has been touted as an important tool for the integration of ecological, social, and economic aspects in blue spaces, but early experience suggests that it is being used mainly as an economic tool for growth in marine and coastal zones.

Blue justice is not suffering because of conservation, but because of economic activities. The mainstream understanding of the blue economy is still dominated by the utopian hope of win-win-win scenarios. Enabling economic activities must not only include transparency about the trade-offs and conflicts at stake but also access to mechanisms that provide legally enforceable consequences or remedies.

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Conflict of Interests

The authors declare no conflict of interests.

Data Availability

Due to the nature of the research, data sharing is not applicable to this article.

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