

TO: Water Directors of the EU Member States and other countries members of the EU WFD CIS process  
CC: Veronica Manfredi, Director, ENV.C and Claudia Olazabal, Head of Unit, ENV.C.1, DG Environment, European Commission  
CC: Members of the SCG of the WFD CIS



**Re: Input to the joint Water and Marine Directors' meeting 28–29 May**

Brussels, 22 May 2025

Dear Water Directors,

On behalf of the Living Rivers Europe coalition<sup>1</sup>, I am writing to share with you our views on some of the issues on the agenda of the forthcoming joint meeting of EU Water and Marine Directors that will be held in Warsaw on the 28-29 May 2025.

## **1. The European Water Resilience Strategy**

As shown by the recent floods and ongoing drought, Europe is increasingly hit by more intense and frequent water-related extreme weather events such as floods, droughts or forest fires which cascade into socio-economic crises. Our current water infrastructure and water management practices are insufficient and inadequate to protect citizens, infrastructure and economic assets against those climate-related risks, which also affect wildlife and the quality of our environment).

Against this backdrop, recognising and enhancing the role of natural freshwater ecosystems in ensuring water resilience is absolutely essential. If there is not enough water stored in nature, we are losing precious regulating functions played by freshwater ecosystems (such as floodplains, wetlands, or riparian vegetation) against floods. Similarly, because the water we consume comes from nowhere but from nature, if there is not enough water in nature (both in surface and groundwater bodies), there can't be enough water for people or the economy. Globally, water storage in surface water in wetlands has dropped by 40% and in groundwater by 70% between 1970 and 2021.

In anticipation of the European Commission's led EU Water Resilience Strategy, we would like to stress that maintaining and restoring healthy freshwater ecosystems needs to be at the core of the European Water Resilience Strategy. It is not only a more cost-effective option than traditional grey infrastructure<sup>5</sup>, but also the only way to lastingly secure our water supply while reaching the objectives of the WFD. The protection, sustainable management and restoration of freshwater ecosystems on a large scale needs to be both a central action in the fourth RBMPs, as well as a central component of the EU Water Resilience Strategy.

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<sup>1</sup> Living Rivers Europe, a coalition of six environmental and angling organisations: WWF's European network, the European Anglers Alliance, European Environmental Bureau, European Rivers Network, Wetlands International Europe and The Nature Conservancy.

***We therefore call upon the Water Directors to:***

- Enforce a systematic prioritisation of nature-based solutions as a pathway to achieving water resilience;
- Secure the adoption of a sound ecological flow regime for all rivers in Europe so that enough water remains in the landscape;
- Enact measures limit net water abstractions in the most water-stressed regions, which are additional to water efficiency measures in order to make sure that water savings from water efficiency result in a net decrease in water abstractions.

For more information, please see our joint recommendations for a Water Resilient EU<sup>2</sup>.

**2. The 7<sup>th</sup> WFD implementation report, the working meeting on WFD exemptions and Surface and Groundwater Pollutants proposal**

The EEA state of water report and the EC assessment of 3<sup>rd</sup> RBMP show that less than 30% of surface water bodies are in good status. While this is disheartening, it is not revealing the real picture of water pollution as Member States are not yet obliged to include compliance with priority substances added in the 2013 update in status assessment. Some MS have done so, while others still only assess status against those substances introduced by the EQSD in 2008. Therefore, the EU numbers is rather a historical record showing to what extent EU waters are polluted with substances that were considered of concern close to 20 years ago.

In the 2013 update of the priority substances, Member States co-legislated that 14 years would be reasonable to comply with the new quality standards (i.e. to 2027), with possibility to delay for another two RBMP cycles (i.e until 2039) making full use of the WFD exemptions 4.4 to 4.9 via a mutatis mutandis clause. With these long timelines, there is no surprise that chemical status of EU waters is (at best) stagnating.

Recognising the conclusions of the State of Water report, the assessment of the 3<sup>rd</sup> RBMPs and amidst growing pressures on freshwater in Europe exacerbated by climate change, we are deeply concerned that Member States – misusing a technical update of EU water pollution standards– are working to weaken core principles of the WFD, slow down implementation and tweak reporting obligations to shield failures to act.

This includes:

- wanting to only include measures in the 5th RBMPs (2034-2039) and again via mutatis mutandis clause making full use of WFD exemptions Art 4.4 to 4.9, thereby giving themselves legal room to postpone action until 2051.
- Introducing new exemptions from the non-deterioration principle
- The development of new indicators specifically designed to show progress / based on efforts and not on results

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<sup>2</sup> LRE joint position, Making Europe Water and Climate Resilient, <https://eeb.org/library/making-europe-water-and-climate-resilient/>

Postponing action on water pollution is only making the issue more difficult and expensive to deal with later on and is undermining Europe's water resilience. There is also broad societal support to act on water pollution<sup>3</sup> as well as among stakeholders<sup>4</sup>.

***We therefore call upon the Water Directors to:***

- Engage NGOs in the strategic dialogues between the European Commission and Member States as observers
- Act to ensure that (as part of ongoing trilogues) MS will be obliged to include measures on the new substances in the 4<sup>th</sup> RBMPs and act with urgency to conclude the negotiations in time for the 4th RBMPs
- Keep the revision within the scope of the mandate and avoid amending basic principles of the WFD, particularly the non-deterioration principle outlined in Article 4(1) and the related exemptions outlined in Article 4(7)
- Refrain from developing indicators that are based on measures instead of outcomes, but support the development of indicators that are based on scientific research to capture the real toxic load felt by aquatic life.

### **3. The revised UWWTD**

Urban wastewater treatment plants are key collection points for contaminants from urban environments, and their discharges represent a key pollution pressure on freshwater bodies. The recast Urban Wastewater Treatment Directive (UWWTD) included welcomed requirements for Member States to ensure that micropollutants are removed at selected urban wastewater treatment plants by 2045 at the latest. This will help improve chemical and ecological status of the receiving water bodies, as well as protect human health.

We are concerned by ongoing efforts to question the Extended Producer Responsibility (EPR) scheme, also included in the recast of the UWWTD, that would help finance these upgrades. The EPR scheme not only relieves the pressure on public budgets and households' water bills, it also a driver for eco-innovation and sustainable product design. The EPR scheme is supported by a broad set of stakeholders.<sup>5</sup>

The European Commission has carried out an extensive Impact Assessment that estimates that the EPR scheme is expected to have a limited financial impact on the pharmaceutical and cosmetic sectors: these industries have the choice either to pass these new costs on in the price of their products (max increase of 0.59%) or to reduce their profit margins on them (average max impact of 0.7%). In addition, the recast Directive gives room for Member States to add to the EPR scheme other sectors producing micropollutants that can be found in urban wastewater.

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<sup>3</sup> The latest [Eurobarometer survey on the Attitudes of Europeans towards the Environment](#) showed that 78% of Europeans want the EU to do more to tackle water pollution.

<sup>4</sup> Joint letter to negotiators calling for swift adoption of updated EU water pollution standards <https://eeb.org/library/open-letter-calling-for-swift-adoption-of-updated-eu-water-pollution-standards/>

<sup>5</sup> See joint letter to Ursula von der Leyen, 6 May 2025 <https://eeb.org/library/joint-letter-calling-on-ursula-von-der-leyen-to-safeguard-extended-producer-responsibility-in-the-recast-uwvtd/>

**We therefore call upon the Water Directors to:**

- Stand by and implement the recently adopted UWWTD, including the EPR scheme and the requirements to remove micropollutants.

We remain available for any follow-up discussion.

Yours sincerely,



Patrick ten Brink,

Secretary General,

European Environmental Bureau

On behalf of *Living Rivers Europe* <sup>6</sup>



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