

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 Water Directors' meeting 27-28 November 2025

Brussels, 21 November 2025

Dear Water Directors,

On behalf of the Living Rivers Europe Coalition, I am writing to share with you our views on some of the issues on the agenda of your forthcoming joint meeting in Copenhagen on the 27-28 November 2025.

1. Endorsement of the CIS Guidance on criteria for identifying free-flowing river stretches

Restoring the connectivity of freshwater ecosystems is crucial, not only to comply with the obligations set under article 9 of the EU Nature Restoration Regulation (NRR), but also as it supports the achievement of the WFD objectives under the Water Framework Directive (WFD), and beyond. Barrier removal can provide a myriad of co-benefits for flood prevention, greenhouse gas emission reduction, biodiversity conservation, fish migration, soil health, etc. For instance, in Spain, barrier removal has been found to reduce methane emissions by up to 10 times,¹ and along the Tisza River in Hungary, the periodic flooding of floodplains was found to enhance carbon sequestration, even during prolonged droughts caused by climate change.²

The CIS guidance, developed by the Free-flowing River core group under the umbrella of the ECOSTAT working group, is the result of a more than one year-work of national water authorities and water experts. Its main value is to provide Member States with a scientifically-based and comparable method to quantify how barrier removal can enable to achieve river connectivity (the free-flowing river stretch status) – and therefore deliver a mutual understanding of what the target defined in article 9 of the NRR implies. It is neither intended to be a prioritisation tool, nor meant to be applied in every single water body - although evidence already indicates that barrier removal in a significant number of river stretches can meet the criteria.³ But it provides the basis for measuring progress towards reaching EU's target to restore at least 25000 km rivers into free-flowing state by 2030.

Every single barrier removal project, even if not delivering entirely free-flowing river stretches according to the criteria of the guidance, is making a positive contribution to the river ecology, and will most likely contribute to the improvement of the environmental quality elements for the ecological status under the WFD – in addition to many other likely co-benefits for biodiversity, climate adaptation, recreational opportunities. Such projects need to be scaled up – and the guidance, especially its fourth criteria on the large-

¹ Bisbal Regidor, E. (2024) [Decarbonizing hydrological landscapes through dam removal](#), University of Barcelona; CSIC (2025) A project assesses the climate impact of dams.

² WWF CEE, [From greenhouse gas emitters to carbon sinks, The role of floodplain restoration on climate regulation](#), 2025.

³ The Directorate-General I - Water Management of the Austrian Federal Ministry of Agriculture and Forestry, Climate and Environmental Protection, Regions and Water Management (BMLUK) has fully applied the criteria defined in the ECOSTAT methodology. Through a coordination process between the Ministry and the administrative units of the federal provinces, as well as stakeholder engagement, over 2,000 km of river stretches have been identified where the free-flowing river status could potentially be restored through future measures (although mostly beyond 2030). More information : <https://www.bmluk.gv.at/themen/wasser/gewaesserbewirtschaftung/fachliche-grundlagen/free-flowing-rivers.html>

scale assessment, should also be seen as a tool to indicate where additional efforts are needed to establish river continuity in the most strategic location as well as in transboundary context. Arguably, any barrier removal sets a precedent with more removals to follow, and Member States need to make efforts to communicate these river restoration projects to ensure buy in from stakeholders and Europeans for future barrier removals across the EU.

We therefore call upon you to:

- **endorse the CIS Guidance on criteria for identifying free-flowing river stretches;**
- refrain from blocking scientifically robust methods developed in full cooperation under the WFD CIS and enabling impactful NRR implementation for political reasons;
- dedicate the necessary resources for impactful implementation of the NRR including the inventory and removal of river barriers as required by its article 9;
- use the NRR reporting template to indicate, in addition to the length of free-flowing rivers expected to be achieved according to the EU-wide method, any progress in removing barriers, even though those restoration measures may not result in FFR stretches at once;
- extend the mandate for the Ecostat-led free-flowing rivers core group to support the prioritisation of barrier removal efforts, based on the guidance.

2. EU Water Resilience Strategy implementation

With droughts, floods and pollution already costing European households, businesses and ecosystems billions of euros every year, the Water Resilience Strategy must be implemented without further delay.

We urge you to:

- **Support the acceleration of the implementation of the Water Framework Directive as the foundation for EU's water resilience, and resists weakening the WFD's provisions before crucial 4th cycle that needs to be the cycle of full WFD implementation.** Engage constructively in the Structured Dialogues and try to use this opportunity to identify ways to overcome bottlenecks in WFD implementation. Implementation priorities should include, where relevant, the definition of sustainable abstraction levels at river basin scale to reduce pressures due to overexploitation of water sources, based on ecological flow and water needs of ecosystems under the WFD, including a systematic review and adjustment of existing permits. We also ask you to involve and inform relevant consultative bodies at national level, including civil society, in the elaboration of the final Dialogue reports.
- Engage with the European Commission to make sure that a substantial share of capacity-building initiatives and funding under the EU Water Resilience Strategy are used to upscale Nature-based solutions for water and climate resilience. In particular:
 - The Water Academy should be used to build skills on using natural water retention in the landscape, including for farmers, farm advisers, landowners, foresters and local authorities;
 - The Blue & Green Corridors initiative should be used to support the restoration of ecological settings and infrastructure including rivers, wetlands, and coastal restoration to restore the water cycle with a source-to-sea approach. For instance, this initiative could be used to scale-up or leverage barrier removals reported under the NRR, even when those activities do not fulfil all the criteria of the free-flowing river guidance;
 - Part of the EIB Water Programme and Sustainable Water Advisory Facility, as well as the Water Resilience Investment Accelerator, should be earmarked to Nature-Based Solutions.

3. Preparation of River Basin Management Plans 2028-2033

With climate change effects rising in intensity and frequency, and the European Environment Agency identifying water pollution and human health as one of the five environmental indicators out of 35 where deteriorating trends are expected to dominate in the next 10-15 years,⁴ **the fourth cycle of River Basin Management Plans (RBMPs) needs to mark a turning point in WFD implementation**, it marks the moment where the Directive's promise must become practice – where compliance is measured not by plans but by outcomes. RBMPs need to address citizens' concerns with the impacts of PFAS and nitrate pollution on public health and rising water bills, drought impacts, and over-abstraction. The RBMP drafting process must be seized as an occasion to align sectoral policies (Common Agricultural Policy, Renewable Energy Directive III, Nature Restoration Law) with WFD objectives to tackle these issues.

As preparations for the fourth cycle River Basin Management Plans are starting, we urge you to:

- **Phase out unjustified exemptions** and make sure that information on exemptions is appropriately disclosed to the public during consultations on draft RBMPs;
- Plan for barrier removal and river continuity restoration in a way which supports the achievement of objectives of the EU NRR, as well as resilience to floods and droughts;
- Ensure regular (at least every 6 years) reviews of permits (including for abstractions and discharges) and ensure they are set in respect with WFD objectives;
- Prevent pollution at source by implementing without delay the updated rules on priority substances in surface and ground waters, including by reviewing discharge permits and the authorisation of listed substances;
- Fully apply the polluter-pays principle by making full use of the cost-recovery principle in Article 9 to help close the funding gap for measures and serve as incentive for more water-resilient practices.

We wish you constructive discussions in Copenhagen and remain at your disposal for any complementary information.

Yours sincerely,

Ester Asin,
Director,
WWF European Policy Office
On behalf of *Living Rivers Europe*⁵



⁴ EEA, [Europe's Environment 2025](#) – Main report, 2025.

⁵ 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](#) and [The Nature Conservancy](#).