

To: Commissioner for Environment, Water Resilience and Circular Economy, Jessika Roswall, Commissioner for Agriculture and Food, Christophe Hansen;

CC: Commissioner for Economy and Productivity; Implementation and Simplification, Valdis Dombrovski; Vice President of the European Commission, Teresa Ribera;

12 March, 2026

Dear Commissioner Hansen, Dear Commissioner Roswall,

We are writing to you as representatives of small and medium-scale farmers', civil and environmental society organisations as a follow-up to the Implementation Dialogue on the environmental legislation you hosted on 18 February 2026 to discuss “difficulties and burdens farmers and forest-holders face in the implementation of the Nitrates Directive, the Water Framework Directive and the Habitats and Birds Directives” and from [which some of the signatories to this letter were excluded](#). **We regret the continuous framing of environmental safeguards as a burden.** The main pressures farmers face do not stem from environmental objectives, but from fragmented implementation, policy instability, insufficient technical advisory systems at national level and the lack of adequate financial incentives to support the transition towards truly sustainable agricultural practices (particularly organic and other agroecological systems). **Thus, we urge you not to weaken the environmental legislation that protects farmers and all Europeans.**

Together with the triple climate, biodiversity and pollution crisis, Europe faces a rural crisis, with thousands of farms disappearing each day. This is a direct result of policies driving concentration, homogenisation and high-input intensification of agriculture, sacrificing thriving countryside and ecosystems, which are crucial to keep producing food in the long term. **The EU Commission and Member States must ensure lively rural areas and healthy environments by implementing its existing legal frameworks** (Birds and Habitats Directives (BHD), Water Framework Directive (WFD), Nitrates Directive, Sustainable Use of Pesticides Directive (SUD)) **that enable nature and water protection, support good agricultural practices and limit livestock intensification.**

Decades after their adoptions, the EU’s main nature and water laws remain insufficiently implemented and enforced across the EU, especially in Member States most affected by nitrate pollution. The most significant [pressures on both surface and groundwaters](#) arise from agriculture, resulting from excessive water use and nutrient and pesticide pollution. The overall state of Europe’s environment is not good and [the European Environmental Agency has warned](#) that **continued degradation, overexploitation and biodiversity loss pose major risks to Europe’s economic prosperity, security and way of life as well as to people’s health and safety.**

Poor implementation of the WFD, the Nitrates Directive and the BHD already have severe and unfair consequences including:

- **Negative human health impacts:** In Brittany, France the deaths of three³ people and more than 30 animals are directly linked to toxic gases from green algae that thrive on the excess nutrients from the region’s high concentration of pig farms.¹
- **Restricting access to drinking water:** In 2024, more than 257,000 persons in Spain lacked drinkable tap water due to unsafe levels of nitrates, caused by excess fertilisers and manure from industrial livestock farming.²

¹ <https://nantes.cour-administrative-appel.fr/decisions-de-justice/dernieres-decisions/responsabilite-de-l-etat-du-fait-de-la-proliferation-des-algues-vertes-en-bretagne>

² <https://www.datadista.com/medioambiente/257-000-personas-sin-agua-potable-en-sus-casas-por-exceso-de-nitratos-en-2024-y-mas-de-un-millon-en-zonas-criticas/>

- **Unfair cost-shifting:** The cost of non-implementation of the BHD and the WFD is estimated to be over €80 billion and €50 billion a year respectively³ - costs that are too often falling on taxpayers instead of polluters.⁴

These negative impacts, that in particular hit vulnerable populations, would only increase if environmental standards are dismantled. Despite this persistent and well-documented situation, recent policy initiatives have instead weakened existing safeguards, without proper impact assessments or due public consultations. For example, the recently adopted amendment of the Nitrates Directive that allows the application of recycled manure, above the current limit, in areas already polluted by nitrates.

Europe's overreliance on high-input farming, that depends on imports of feed and fertiliser from third countries and the use of harmful pesticides, has proven highly inefficient in terms of nutrient management, with alarming losses of nutrients from agricultural lands due to degraded soils and excessive use of fertiliser, while pesticides are detrimental to soil biodiversity. This in turn has resulted in widespread water pollution across Europe and impacts on human health. **These issues, that undermine long-term healthy food production, cannot be solved by techno-fixes but rather require structural changes of the agri-food system.**

Sustainable agricultural practices, such as agroecology and organic farming, offer sound soil management, efficient nutrient use and minimisation or phase-out of pesticide use in agricultural landscapes. The use of leguminous crops for nitrogen fixation or the re-integration of extensive livestock farming can result in healthier soils that retain both nutrients and water. Tools to promote these practices while protecting water, nature and public areas, are offered in existing legislation. For example, the establishment of Good Agricultural Practices to prevent nitrogen losses under the Nitrates Directive and advisory systems to support farmers under the SUD.

The focus now needs to be placed on implementing and enforcing those rules. The Danish Green Tripartite Agreement between the government and key stakeholders, including water agencies, farmers and landowners, shows this is possible where there is political will. Administrative simplification is welcome when it genuinely reduces unnecessary paperwork for farmers, but it must not weaken environmental safeguards nor create uncertainty regarding long-term objectives. Farmers need predictability to invest in sustainable transitions.

We therefore urge the EU Commission to:

- **Refrain from weakening the WFD, the Nitrates Directive or the BHD;**
- **Work to close the implementation, enforcement and funding gaps for environmental, water and nature legislation;**
- **Withdraw the RENURE act;**
- **Strengthen monitoring, reporting, and public access to environmental data,** enabling health authorities, researchers, and citizens to better assess risks and trends;
- **Ensure the Common Agricultural Policy effectively supports and ensures the transition to sustainable nutrient and water management, the phase out of harmful pesticides and a fair agri-food system;**
- **Promote the One Health approach,** where humans, animals and environmental entities thrive together, as the most sound solution to the ongoing triple climate, nature and pollution crisis.

Yours sincerely,

³ https://op.europa.eu/en/publication-detail/-/publication/4dead000-263d-11f0-8a44-01aa75ed71a1/language-en?mc_cid=d30edf72a9&mc_eid=3bdab86db2

⁴ <https://www.eca.europa.eu/en/publications?did=58811>

European Environmental Bureau

New Water Culture Foundation (FNCA)

Deutsche Umwelthilfe (DUH)

BirdLife Europe and Central Asia

SEO (BirdLife Spain)

Pesticide Action Network Europe

The Nature Conservancy Europe

Greenpeace

Friends of the Earth Europe

Wetlands International

European Coordination Via Campesina (ECVC)

