



TO: Water Directors of the EU Member States and other countries members of the EU WFD CIS process

CC: Members of the SCG of the WFD CIS, Veronica Manfredi, Director, ENV.C Claudia Olazabal, Head of Unit, ENV.C.1 DG Environment, European Commission

Re: Input to the extra meeting of CIS SCG on the Water Framework Directive's review and revision

Brussels, 7 April 2026

Dear Water Director,

On behalf of the Living Rivers Europe coalition¹, I am writing to share with you our views on the targeted revision of the Water Framework Directive (WFD) that will be discussed in the forthcoming special meeting in the framework of the WFD Common Implementation Strategy that will be held in Brussels on 16 April 2026.

The Living Rivers Coalition reacted with shock to the Commission's announcement, in the RESourceEU Action Plan Communication, that the European Commission not only intends to stress-test and review the WFD, but has already committed to revise the WFD by Q2 this year to "promote circularity and access to critical raw materials in the EU". No proof has been put forward that such a revision is justified. Rather, the Commission is now, in the [call for evidence](#), asking the Critical Raw Materials sector to provide evidence of the bottlenecks and problems in permitting that they claim stem from the WFD. Committing to a revision before having the proof that this is needed is in stark contrast to the Commission's own Better Regulation ambition to base EU policies on the best available evidence.

The EU water acquis (the WFD with daughter Directives and the Nitrates Directive) is Europe's key tool to protect water quality and quantity and to ensure a fair balance between different water users. We regret the continuous framing of environmental safeguards as a burden and the flawed and obscure processes the Commission uses to validate their dismantling. For example, the Implementation Dialogue organised by Commissioners Hansen and Roswall on 18 February with representatives of the agriculture sector was an invitation to discuss "difficulties and burdens farmers face in the implementation of the Nitrates Directive, the Water Framework Directive and the Habitats and Birds Directives". If the WFD is revised in line with the mining (and several other sectors') wish list², it would be a devastating blow for nature and EU citizens alike and stands in stark contrast to the recent huge mobilisation of Europeans against environmental rollbacks.³ It also invites other sectors to lobby in favour of exemptions for their water pollution too. Commissioner Hansen has already committed "to look again at the Nitrates and Water

¹ Living Rivers Europe, a coalition of seven environmental and angling organisations: WWF's European network, the European Anglers Alliance, European Environmental Bureau, European Rivers Network, Wetlands International Europe, The Nature Conservancy and Surfrider Foundation Europe.

² [Industry's role in water resilience: How some lead – and others wreck](#) analysed how a number of powerful industry actors across the **agriculture, energy, mining** and **chemicals** sectors are lobbying the EU Commission to water down the Water Framework Directive.

³ In just ten days in September 2025 almost 200,000 citizens responded to the Commission's call for evidence for simplification of the EU's environmental rules opposing environmental rollbacks.

Framework Directives”⁴ due to increased price of fertilisers and the war in Iran, and several Agriculture Ministers called for the revision of the Water Framework (Finland, France), and Nitrates directives during the AGRIFISH Council meeting on 30 March.

The Commission carried out a thorough [fitness check evaluation](#) of the WFD and concluded that the directive was fit for purpose, with sufficient flexibility. Member States were also just recently granted more flexibility, in the form of two new exemptions from the non-deterioration principle, in the political deal on updated water pollution standards for the EU, which has just been adopted after almost four years of intense negotiations. National authorities are now drafting the next River Basin Management Plans under those premises. Launching a revision of the WFD, or related water legislation, such as the Nitrates Directive, at this moment risks diverting valuable time and resources from the national authorities to deal with the revision instead of trying to overcome implementation gaps.

The EU Water Resilience Strategy presented in June last year underlined that “Achieving water resilience will depend on enhanced implementation of the comprehensive EU water acquis”, and the Council conclusions on water resilience from October 2025 stressed “the urgent need for improved implementation of existing EU water legislation across sectors”.⁵ The Commission also launched several flagship initiatives, including Structured Dialogues with Member States, to help identify and close implementation gaps. These efforts are undermined as the WFD standards and deadlines may be changed as the result of the planned revision. Several guidance documents, on exemptions⁶ and environmental permitting, have also been promised for Q1 this year. We find it premature to rewrite the rules before the results of these actions and existing flexibilities introduced have been exhausted.

A revision of the water acquis entails substantial risks for the weakening of Europe’s water protection, opening the door for more pollution and degradation of water bodies. Allowing certain sectors a licence to pollute or abstract more, will only make it more difficult to reach the WFD objectives, while shifting the resulting costs to others, including taxpayers, downstream water users and drinking water bills. Europe’s waters, and therefore our resilience, economy and prosperity rely on healthy freshwater and coastal ecosystems. All efforts now need to be to improve the implementation of the existing legal framework and not divert valuable time of national authorities away from translating policies into ecological outcomes.

We therefore call upon the Water Directors to:

- Oppose Commission’s plans to weaken the water protection obligations made under excessive lobby from polluters *inter alia* during the SCG meeting on 16 April and stand for people’s health and right to clean environment.
- Call on your Minister to oppose the Commission’s plans to revise the WFD that risk diverting resources away from meaningful implementation.

⁴https://multimedia.europarl.europa.eu/fr/webstreaming/agri-committee-meeting_20260319-0900-COMMITTEE-AGRI

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⁶ Such guidance was announced as a follow-up of the [Task Force on exemptions](#), convened by the Commission with Member States representatives, in the framework of the WFD Common Implementation Strategy. The Task Force met three times in 2025.

- Call on your Minister to oppose amending and weakening the Nitrates Directive and instead focus resources on closing implementation and data gaps.
- Call on your government to prioritise the full and timely implementation of the existing water acquis, including ensuring sufficient financing.

For more information, please see our joint briefing paper on the WFD review and revision.⁷

Yours sincerely,

Ester Asin

Director, WWF European Policy Office, on behalf of the Living Rivers Europe NGO coalition

⁷ Briefing paper, Water Framework Directive review and revision, <https://eeb.org/fr/library/briefing-paper-on-the-water-framework-directive-review-and-revision/>