Living Rivers Europe

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; Members of the SCG of the WFD CIS

**Re: Input to the Water Directors' meeting 23-25 November 2026**

Brussels, 16 November 2026

Dear Water Directors,

On behalf of the Living Rivers Europe coalition of NGOs[1], and ahead of your forthcoming meeting in Cork on 23-25 November 2026, I am writing to bring to your attention two issues which we believe are closely related to the agenda of the meeting.

## 1. New Water Initiative

In the State of the European Union Address, Ursula von der Leyen announced a new water initiative to respond to this Summer' climate extremes while many of the actions of the Water Resilience Strategy, such as the Sponge Facility, have not been delivered. The articulation between this initiative and the targeted revision of the Water Framework Directive (WFD) announced in December 2025, is still unclear.

Drought, heatwaves and wildfires have severely hit Europe this summer and deserve increased coordination and action across administrations and economic sectors. We believe that the WFD offers Member States relevant, but under-used instruments to address worsening impacts of climate change. Such instruments include mandatory controls on abstraction and impoundments, mandatory review of abstraction permits set out in WFD articles 11(3)(e) and 11(5); economic instruments under WFD article 9; and the obligation to assess significant water abstraction pressures affecting the ability of reaching good status under WFD annex VII(A)(2).

In addition, the CIS Technical guidance on Drought Management Plans, developed by the Working Group on Water Scarcity & Droughts following a more than one year-work, will help step-up prevention, preparedness, response and recovery capacity, while ensuring that drought management measures remain consistent with the WFD. Arguably, a new Water Initiative can create further incentives and tools to address climate extremes but should not pave the way to a revision of the WFD, as that would open the door to tearing apart fundamental principles and objectives of the directive, which are needed to uphold water resilience and halt biodiversity loss.[2]

Multiple interventions during the Strategic Coordination Group meeting of November 5th showed that substantial confusion surrounds the reasoning behind the targeted revision of the WFD and its relationship with the new European Water Initiative. As made clear in our previous letters, LRE opposes the revision of the WFD. So do five Environment Ministers who have called against this

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

[2] WWF' last Living Planet Index report revealed that worldwide there has been an 85% decline in the average size of monitored freshwater populations, the strongest decline among all ecosystems.

revision, in addition to 1.254.722 citizens who have signed a petition calling our European leaders to defend the laws that protect people and nature.[3]

As for agriculture, we recommend prioritising measures which restore landscape water resilience and contribute to flood and drought risk reduction, while preserving water for ecosystems; and which better guarantees equitable and affordable access to water for all users both now and in the future. Several letters and notes were sent to the Agriculture and Fisheries Ministers in September[4] and October[5] demanding to structurally reduce the vulnerability of agriculture to drought, but in practice calling for extremely different measures. We believe the focus should be on incentivising soil and water management practices that improve the water-retention capacity of agricultural land, and supporting these through agri-environment-climate actions in the CAP (complemented by other actions such as the Sponge Facility planned under the Water Resilience Strategy), rather than on how irrigation enhancement and water reservoirs.

***We therefore call upon you to:***

- Support the acceleration of the implementation of the WFD on water quantity and water quality, as a follow-up to the structured dialogues and using the full potential of River Basin Management Plans (RBMPs) to anticipate the impacts of climate change on the water cycle.
- Endorse the CIS Technical Guidance on Drought Management Plans and apply it.
- Use the fourth RBMPs to ensure regular reviews of permits in respect with WFD objectives and make full use of the cost-recovery principle in Article 9 to close the funding gap and incentivise more water-resilient practices.
- Engage with the European Commission to make sure that the upcoming Water Initiative is focused on implementing the WFD, and incentivising natural water retention in the landscape[6] and exclude any measures which could create lock-ins into unsustainable and water intensive practices, particularly in agriculture, or could lead to maladaptation.
- Engage with your agricultural counterparts to devise agri-environment-climate schemes that can build water and climate resilience for the CAP chapter of the NRPPs.

**2. New rules on manure application**

The European Commission has just concluded, in its evaluation of the Nitrates Directive[7], that the Directive remains necessary, relevant and effective, and in particular stressed the importance of the manure application limit, which was dubbed as having served as a "pivotal benchmark" for curbing the negative impacts of intensive animal farming.[8] But at the same time, the Commission has published a draft Act that would exempt digested manure from the minimum common baseline, an expansion of the RENURE act that was adopted earlier this year. The draft Act is expected to be put for vote in the Nitrates Committee on 11 December 2026.

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[3] Hands Off Nature – Defend Europe's Forests, Rivers & Wildlife

[4] Notes put forward by Austria, Croatia and Slovenia on the impact of drought on their countries and EU's agriculture, background-brief-agrifish-28-29-september-2026.pdf

[5] Note from 22 October 2026, on behalf of France and Portugal, " Taking action at the European level to support the adaptation of agriculture to climate change and to strengthen the water resilience of farms";

[6] See more detailed proposals in our briefing paper: https://wwfeu.awsassets.panda.org/downloads/policy-brief-on-eu-water-policies-in-times-of-climate-extremes.pdf

[7] https://ec.europa.eu/commission/presscorner/detail/en/ip_26_1594

[8] The origin, rationale and importance of the manure limit is outlined in detail in annex XVII of the Staff Working Document to the evaluation of the Nitrates Directive

The Act would allow Member States to apply an additional 80 kg N from certain fractions of digested manure above the 170 kg N limit set in the Nitrates Directive. This is a near 50% increase in the amount of nitrogen from manure allowed on fields in Nitrogen Vulnerable Zones. The initiative is in stark contrast to the findings of the Commission's own evaluation that "the manure application limit is **effective, scientifically sound and cost-efficient**, although, in polluted areas, it may not be sufficient to achieve the Directive's objectives."

The manure application limit was established to provide a minimum EU common basis to mitigate environmental and health risks related to intensive livestock production, corresponding to 2 Livestock Units per hectare. Translated to animal densities, the RENURE act and it proposed expansion raises the minimum threshold to nearly 3 livestock Units per hectare, an extreme concentration only found in pollution hotspots like the Netherlands, Flanders and northern Italy.

Water pollution resulting from agriculture activities remain one of the key challenges for water resilience in Europe and comes with a substantial cost for society estimated to cost EU taxpayers €22 billion yearly, including for drinking water treatment. While for unclear reasons, **the Commission has still not published the EU-wide Nitrates Directive implementation report** for the 2019-2023 period, snapshot reporting show that progress to improve nitrogen pollution in surface and groundwater has stagnated in recent years and even deteriorated in several areas.

A recent JRC study concluded that **a reduction of livestock densities to 2 LSU/ha could cut nitrate leaching and runoff by over 50% in hotspot regions.** The initiative from the Commission to expand the RENURE act raises several questions regarding its compatibility with EU water protection and zero pollution objectives as it instead risks locking in unsustainably high farmed animal densities in the regions that struggle the most with manure surplus and that would benefit the most of de-intensification.

***We therefore call upon you to:***

- Call for an AOB point in the Water Directors' meeting to discuss the wider environmental and socio-economic impacts of this initiative and its impact on achieving WFD objectives ahead of its vote in the Nitrates Committee.
- Call on your representatives in the Nitrates Committee to not support the draft Act as it risks locking in continued water pollution from agriculture, in particular in hotspot areas.
- Support the acceleration of the implementation of the Nitrates Directive and ensure the 4th RBMPs and the next Nitrates Directive action programmes (2028-2031) are designed to meet water protection objectives.

We wish you constructive discussions in Cork and remain at your disposal.

Yours sincerely,

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