

EurEau Recommendations on the Revision of the Water Framework Directive (WFD)

Protecting our drinking water resources in a changing geopolitical climate



1. Background

Water service providers are defined as **critical entities** under Directive 2022/2557¹ delivering services that are essential to **maintain vital societal functions** under all circumstances². Protecting the resilience and affordability of water services should there represent an **overriding public interest**.

The **Water Resilience Strategy** released by the Commission in June 2025, states that 'Water resilience is a matter of security and crisis preparedness for the EU. Water is a basic need and a critical resource'. The Strategy pursues three key objectives:

1. Restoring and protecting the water cycle
2. Building a water-smart economy
3. Securing clean and affordable water and sanitation for all at all times.

In December 2025, the Commission published its **RESourceEU Action Plan**³ in which it announced a review and revision of the WFD in Q2 2026. The initiatives will pay 'particular attention to simplification and the need to address potential bottlenecks, in order to promote circularity and access to critical raw materials in the EU, while protecting the environment and human health'.

2. Risks versus needs of revising the WFD

WFD – still an innovative tool to fix the broken water cycle

Some voices today are calling the WFD a failure, as none of the Member States is likely to meet the 2027 targets. However, this sombre assessment unfairly overlooks the significant

¹ [Directive \(EU\) 2022/2557 on the resilience of critical entities and repealing Council Directive 2008/114/EC](#)

² [Joint Communication on Preparedness Union Strategy](#).

³ COM(2025) 945 final.



improvements made possible by the Directive in the past 25 years.

- ~ The Water Framework Directive has successfully set up a **cross-border governance framework** for integrated water management for more than 110,000 water bodies in the EU.
- ~ WFD implementation has considerably **increased knowledge on European waters**. The increased understanding of water bodies and the measures needed for improving their status was emphasised in the 2024 EEA report "Europe's state of water 2024: the need for improved water resilience"⁴.
- ~ The 7th WFD Implementation Report, published in 2024, shows a steady improvement in the chemical and quantitative statuses of groundwater bodies in the EU between the 1st and 3rd River Basin Management Plans.⁵

As a Framework Directive, much of the WFD's success – and shortcomings – are attributable to how Member States have translated its objectives into concrete measures – or have failed to do so. The annex to this paper contains a selection of WFD success stories.

What are the risks of revising the WFD?

Water service providers are very concerned that the WFD revision will lead to a weakening of its goals and requirements and, hence, affect the resilience of water services.

While the RESourceEU Action Plan aims to facilitate access to critical raw materials, loosening the requirements under article 4(7) would have repercussions across many more economic sectors. The consequences for the quality and quantity of our drinking water resources can be massive.

Even if the revision focussed solely on strategic mining, experience shows that we must expect a substantial negative impact on water resources in the area concerned. Some may find the safeguards in the current directive onerous, but they are in place for a reason: if mining, or any other activity, harms the resources we depend on for drinking water, the delivery of water services is jeopardised.

If water services are compromised, as critical entities, this has a knock-on effect on the most essential societal and economic function in the affected area. When water services have to invest in additional treatment to undo the damage caused by pollution, the WFD's cost-recovery principle means that it translates into higher water bills for households and businesses alike. **SMEs and larger companies across Europe depend on water services** for water supply and wastewater management for their offices and production lines, **just as citizens depend on them at home**.

In addition, a previous revision of parts of the WFD, including Article 4(7), is not yet finalised after over three years and will take effect at the earliest in December 2027 (transposition deadline). Changing the rules again before the previous changes are even in place creates unprecedented legal uncertainty for national authorities as they draft the next River Basin

⁴ <https://www.eea.europa.eu/en/analysis/publications/europes-state-of-water-2024>.

⁵ See figures 4 and 5 on page 10, [Eur-Lex](#).



Management Plans, and for all entities involved in implementing them, from water services and local authorities to businesses who need clear rules for compliance. **This uncertainty will hold up much-needed investments in water resilience, as decision-makers wait once again to find out what the law will say.**

Do we need to revise the WFD?

The 2019 [WFD Evaluation](#) concluded that the WFD is fit for purpose. Before the Commission decides to initiate a new revision, it should provide evidence that it is necessary.

As announced by the RESourceEU Action Plan, the Commission will publish a guidance document in Q1 'to enable a simpler and more harmonised implementation in Member States of the EU law on environmental permitting.' This guidance will be an opportunity to assess whether a change in the Directive is justified. **It is premature to assume that a revision is needed as long as this Commission analysis is not available.**

Of particular relevance to this analysis is the question of where problems with the current framework come from. There is evidence to suggest that many of the permitting challenges faced by the mining industry can be attributed to national rules, or a very strict interpretation of EU rules. In such cases, the solution cannot be to change the rules for the EU as a whole.

3. How can we reconcile conflicting public interests?

EurEau acknowledges the dramatic geopolitical changes. On the other hand, increasing Europe's self-sufficiency in strategic raw materials cannot go against the resilience of water services which form the backbone of industrial and commercial activities.

Policy makers need to find a way to reconcile both sides. EurEau suggests the following elements:

1. The WFD should only be revised if the **Guidance document provides evidence that a revision is really needed.**
2. If a revision is considered indispensable to facilitate mining for strategic raw materials, a **full and thorough impact assessment** should be conducted with a particular focus on the impact on the quantity and quality of drinking water resources.
3. The Commission should ensure that the revision remains **limited to mining for strategic raw materials** in line with the RESourceEU Action Plan. The requirements should not change for other sectors.
4. Any proposed changes to the WFD should be tied explicitly to the requirement to **safeguard drinking water resources** in line with Article 7(3) WFD.

EurEau and its members stand ready to discuss a pragmatic way forward with all relevant stakeholders.



ANNEX

Water Framework Directive (WFD) – Success Stories

Positive impacts of river restoration (See Wetlands International: [here](#))

A case study report by Wetlands International and the Italian Centre for River Restoration highlights eight European rivers where restoration measures have resulted in improved water quality, increased biodiversity, and enhanced resilience to floods and droughts.

- ~ Rivers Bocq and Eau Blanche (Belgium)
- ~ River Drac (France)
- ~ River Cofio (Spain)
- ~ River Orbigo (Spain)
- ~ River Segura (Spain)
- ~ River Turia (Spain)
- ~ River Eddleston Water (United Kingdom)
- ~ River Glaven (United Kingdom)

These projects focused on:

- ~ Reconnecting rivers with their floodplains
- ~ Removing barriers to fish migration
- ~ Restoring natural flow regimes
- ~ Engaging local communities in planning and monitoring

The River Wensum, UK (See [here](#))

In the UK, the River Wensum in Norfolk has seen progress in reducing nitrate pollution—a major challenge for lowland arable catchments. Through targeted measures under the WFD and the EU Nitrates Directive, local authorities and farmers have adopted practices to reduce agricultural runoff, leading to gradual improvements in water quality and ecosystem health. healthsciencedirect.com.

Integrated Water Management, Netherlands (See [here](#))

The Netherlands has made strides in addressing water quality through integrated, cross-sectoral approaches. By aligning agricultural, urban, and industrial policies with WFD objectives, the country has reduced pollution and improved the ecological status of several water bodies. Lessons from the Netherlands emphasise the importance of strong governance and coordination among stakeholders.



Public Participation and Governance Innovations

Across Europe, the WFD has spurred innovative governance models, such as:

- **France's SAGE (Water Development and Management Schemes):** Local committees involving farmers, industries, and citizens have successfully balanced water use and protection.
- **Germany's River Basin Cooperatives:** These cooperatives bring together diverse actors to implement restoration projects, often leading to improved water quality and habitat conditions.

These examples show that when the WFD is implemented with strong local engagement, clear objectives, and adaptive management, it can deliver significant environmental and social benefits.

PROVISIONAL

About EurEau

EurEau represents Europe's water sector, bringing together 70,000 public and private drinking water and wastewater service providers across 33 countries.

We work with EU institutions and international organisations to ensure legislation supports resilient, sustainable and affordable water services by protecting water quality, promoting resource efficiency and safeguarding access to water.



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