

Brussels, 26 October 2026

To: Members of the CIS Strategic Coordination Group

Cc: European Commission, ENV.C.1

Re: Water services call against Water Framework Directive revision

Dear Members of the SCG,

Aqua Publica Europea, AquaFed, EurEau and the **European Water Association (EWA)**, collectively representing water services from across Europe, delivering drinking water and safely managing wastewater for over 500 million Europeans, and **SGI Europe**, representing services of general interest in the EU, are writing to share our concerns regarding the European Commission's intention to revise the Water Framework Directive (WFD).

In her State of the European Union address, President Von der Leyen once again rightly placed water resilience at the heart of the EU's political agenda. President Von der Leyen's acknowledgment that water is fundamental to the European people, Europe's industry and food security reflects the reality facing water services across Europe. Climate change, pollution, ageing infrastructure and increasing demand are putting growing pressure on Europe's water resources and the assets that deliver essential water services.

Climate change is already affecting the availability of fresh water; the extremely dry summer of 2026 demonstrated once again the urgency of action. Crucially, the effects of drought and water scarcity are exacerbated by water quality issues. When checks on the pollution of water resources are removed, these resources risk becoming unusable for drinking water or other beneficial uses, effectively reducing the available water resources.

In order to function, Europe's economy and society do not just need enough water, they need enough *clean* water.

The Commission recognised in the Water Resilience Strategy that achieving water resilience depends on better implementation and enforcement of the existing water acquis. The WFD is and should remain the cornerstone of EU water policy and the foundation of Europe's efforts to protect both water quality and water quantity. A European Water Initiative could provide a push for closer coordination between Member States, accelerate implementation of existing water legislation, and promote the exchange of best practices on water efficiency, digitalisation, source control and resilience. The initiative should build on the Water Resilience Strategy and address water quality and quantity as two sides of the same coin.

The water sector has repeatedly stressed that water resilience starts with protecting water resources and preventing pollution at source. In this regard, revising the WFD, instead of speeding up implementation and failing to tackle pollution, can pose a significant risk for future water security and resilience. **Removing or weakening WFD provisions risks exacerbating existing challenges rather than solving them.**

Preventing contamination at the source is significantly cheaper and more efficient than "end-of-pipe" treatments, where pollutants are highly diluted and therefore much harder to remove. Without the tools, binding targets, and tightly framed derogations of the Water Framework Directive (WFD), European actors lose a vital compass for environmental protection. **Water services are critical entities**; when they are compromised by pollution, the knock-on effects disrupt our most essential societal and economic functions.

Citizens, services of general interest (SGIs), small and large businesses all depend heavily on reliable water supply and wastewater management for their daily lives, offices, and production lines. Undoing pollution damage translates directly into higher water bills for households and businesses alike: **making the broader public and general economy pay for this additional cleanup does not boost European competitiveness**, it shifts the financial burden from polluters to other economic sectors, and ultimately jeopardises the future.

Given these potentially serious effects, any WFD revision should only be undertaken with solid justifications. So far, we have not seen such justifications. In May 2026, the Commission published guidance on the implementation of the Directive, outlining how strategic projects, including mining projects, can proceed under the existing legal framework while respecting water protection requirements. The guidance demonstrates that the Directive already contains sufficient flexibility and that implementation solutions are available without legislative change, casting serious doubt on the necessity of a revision.

These doubts were echoed during the Environment Council of June 2026 when France, Italy, Spain, Denmark and Hungary publicly opposed a revision of the WFD, arguing that the current framework already provides adequate flexibility. If cases arise whereby some national rules going beyond WFD requirements truly pose an obstacle to critical raw materials (CRM) projects, then changing the WFD itself would be neither an adequate nor a proportionate solution.

We call on the European Commission to use the upcoming European Water Initiative to strengthen the implementation of the existing EU water acquis in line with the Water Resilience Strategy, but to **refrain from revising the WFD**. Revising the Directive without a clear evidence base undermines water protection at a time when Europe can least afford it.

Clean and affordable water is a human right and a public good and water resilience is a matter of security – reopening the WFD now would put all three at risk.

Yours sincerely,

