



To:

Jessika Roswall, Commissioner for Environment, Water Resilience and a Competitive Circular Economy

Antonio Decaro, Chair of the ENVI Committee in the European Parliament

Arkadiusz Pluciński, Minister-Counsellor, Polish Representative to COREPER I

CC:

Paulina Dejmek Hack, Head of Cabinet to Commissioner Roswall, Patrick Child, acting Director-General of DG ENV, Claudia Olazábal, Head of Sustainable Freshwater Management Unit at DG ENV

MEPs Javi López, Hildegard Bentele, Michal Wiezik, Kai Tegethoff, Per Clausen, Pietro Fiocchi

Coreper I Deputy Representatives

Subject: Open letter calling for swift adoption of updated EU water pollution standards

Dear Commissioner,

Dear Polish Representative to COREPER I

Dear Chair of the Committee on the Environment, Climate and Food Safety

We, as representatives of drinking water and wastewater service providers, environmental civil society organisations, healthcare professionals, social partners, recreational fishing associations, business relying on clean and healthy water as well as local authorities, are writing to you to share our deep concerns about the slow

progress in adopting the proposed new EU water pollution standards¹, as well as proposals to weaken and delay implementation of the Water Framework Directive (WFD).

The EEA's recent State of Water report revealed that **water pollution across the EU remains significant**, with less than 30% of surface water bodies meeting good chemical status, putting at risk the health of aquatic ecosystems, access to clean water and burdening the public budget. Strong regulatory action is needed to prevent further water pollution, but close to 2.5 years after the publication of the Commission's proposal to update the lists of priority pollutants for surface and groundwater, an agreement between the EU institutions is still not reached. As a result, critical pollutants such as PFAS, pesticides and pharmaceuticals remain unregulated in EU waters contributing to widespread contamination - even of Europe's most pristine waters.

We are also concerned about the attempts of the Council to include new exemptions to Article 4 of the WFD, for temporary deterioration and for allowing deterioration following relocation of water or sediment. These amendments to core elements of the WFD go against the recent evaluation that concluded that the WFD is fit for purpose. Competitiveness also means keeping a stable regulatory framework on water in order to drive investment into the water sector. Additionally, Member States already have a large margin to provide permits also for projects that lead to deterioration of water status when they are determined to be of overriding public interest.²

The update of the list of priority pollutants in surface water and groundwater is already long overdue. The lists should be updated at least every 6 years to keep up with the science and ensure water security.³ However, those updates were last done in 2013 for surface water and in 2014 for groundwater. Two other initiatives (on air quality and urban wastewater) presented in the same zero pollution package have already been adopted.

Member States need urgent clarity on which rules to apply in the upcoming River Basin Management Plans (RBMPs) for the period 2028-2033. Work on these RBMPs should start in 2025, but a delay in adoption could result in a material impossibility for Member States to take the updated lists of pollutants into account when drafting their plans. This would mean delaying the monitoring and tackling of new substances by six years.

The uptake of innovative pollution monitoring technologies has great potential to facilitate the implementation of the updated list of pollutants. The impact assessment of the Commission's proposal also showed that the benefits for society (savings in the cost of water and sludge treatment, a healthier ecosystem and savings in healthcare costs) considerably outweigh the costs of additional monitoring.⁴

We therefore call on you to

- Prioritise the negotiations and work towards an inter-institutional agreement under the Polish Presidency
- Ensure that Member States are required to include measures to curb pollution by the newly listed substances in the next River Basin Management Plans (covering the period 2028-2033)
- Uphold existing water protection rules and oppose new exemptions to the WFD.

Healthy waters are not only a vital natural resource for human well-being and the environment but also a key driver of Europe's resilience and global competitiveness. Only by upholding the integrity of the WFD, maintaining a strong, predictable regulatory framework, and ensure its effective implementation can we safeguard Europe's water resources while fostering innovation, investment, and economic prosperity.

¹ Regulated under the Water Framework Directive, the Groundwater Directive and the Environmental Quality Standards Directive (Directive 2022/0344 (COD))

² As clarified by the court in Case C-346/14 (EC v Austria).

³ Water Framework Directive Article 16(4) and 16(7), Environmental Quality Standards Directive Article 8, Groundwater Directive Article 10

⁴ European Commission, [Executive summary of the impact assessment report](#), SWD(2022) 543 final. 2022.

Signatories:

Aqua Publica Europea

European Environmental Bureau

European Mollusc Producers Association

European Public Service Union

EurEau

European Anglers Alliance

European Rivers Network

European Water Association

European Fishing Tackle and Trade Association

Health Care Without Harm Europe

Lyon Metropole

Natural Mineral Waters Europe

PAN Europe

Seas At Risk

Surfrider Foundation Europe

Wetlands International Europe

WWF