

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

CC: Member State representatives of the SCG of the WFD CIS; Veronica Manfredi, Director, ENV.C and Claudia Olazabal, Head of Unit, ENV.C.1, DG Environment, European Commission



Brussels, 11 June 2026

Re: Input to the joint Water and Marine Directors' meeting 18-19 June (under the Cyprus Presidency)

Dear Water Director,

On behalf of the Living Rivers Europe coalition¹, I am writing to share with you our views on some of the issues on the agenda of the forthcoming joint meeting of EU Water and Marine Directors under the Cyprus Presidency on the 18-19 June 2026.

1. WFD revision and the EC guidance document on permitting for mining sector

The Commission's announcement in the RESource EU Action Plan in December last year marks a worrying U-turn in the European Commission's objective to enhance Europe's water resilience. It also repeats a worrying pattern of the Commission increasingly circumventing its own rules on sound policymaking (the Better Regulation guidelines) which includes a commitment to evidence-based policymaking.

The announcement to revise the WFD in Q2 this year is not supported by any evidence or evaluation that this is needed or justified. Similarly, the mining sector has presented no evidence of the 'bottlenecks and permitting hurdles that they claim stem from water protections. On the contrary, several public authorities have stated that the WFD poses no obstacle to the permitting process; it is possible to grant permits also for extractive operations in line with the WFD objectives. Instances where permits have been rejected are due to incomplete applications or lack of commitment to invest in mitigation options such as treatment.

The Commission's 'Guidance for the implementation of the Water Framework Directive during the permitting of new projects and existing activities with a particular focus on the mining sector', published on 22 May, outlines the range of flexibilities Member States have when granting permits, including for extractive projects. This reinforces the message conveyed by the majority of the 3,000 respondents to the call for evidence, that a revision of the WFD is not needed.

Revising the legal framework, without any evidence that this is needed, and lowering environmental requirements for the critical raw materials industry is a lose-lose situation that will lead to further avoidable pollution and degradation of water bodies.

We therefore call upon the Water Directors to:

- Oppose the Commission's plans to weaken water protection obligations following excessive and disproportionate lobbying from polluters, and stand for people's health and right to a clean environment²;
- Call on your relevant Minister to oppose the Commission's plans to revise the WFD that risk diverting resources away from meaningful implementation and slowing down urgently needed investments into water resilience;

- Reduce reliance on exemptions in the preparations of the 4th RBMPs and ensure they are only used in exceptional and well-justified cases.

For more information, please see our joint briefing paper on the WFD review and revision.³

2. CIS WG Groundwater workstream

Groundwater, aside from providing drinking water for 75% of Europeans⁴, plays a crucial role in supporting ecosystems both above and below ground. Classification of good status of groundwater bodies under the Water Framework Directive requires that both the quantity and quality are good enough to not result in any significant damage to terrestrial ecosystems which depend directly on them.

The Commission's assessment of the 3rd River Basin Management Plans noted that "not all Member States adequately consider the needs of groundwater-dependent ecosystems" when assessing the quantitative status of groundwater bodies. Therefore, the status of groundwaters in Europe is likely less good than reported.

While we recognise capacity constraints of the CIS Working Group for Groundwater, we believe it is crucial that the foreseen task number 5 in the CIS Work Program, with the objective of improving the comparability of status assessment between Member States, be maintained.

Proper assessment of groundwater quality and quantity to guide measures is increasingly important in light of the triple pollution, climate change and biodiversity crisis.

We therefore call upon the Water Directors to:

- Request that task number 5 in the CIS Work Program for the Working Group Groundwater remains a priority;
- Ensure that groundwater dependent ecosystems are properly considered in the assessment of groundwater status and the planning of measures in the 4th River Basin Management Plans.

3. Free-flowing rivers guidance

While we urge you to use the opportunity of the implementation of the Nature Restoration Regulation to restore our degraded rivers to free-flowing river condition (FFR) at scale, we also acknowledge that even where FFR conditions are not achieved, there is merit in reporting partial progress towards free-flowing characteristics. The FFR drafting group has elaborated details on how this partial progress can be reported as an addendum to the present guidance document⁵.

We therefore call upon the Water Directors to:

- Endorse the addendum on partial progress towards river connectivity (amending the CIS Guidance #41 "Criteria for Identifying Free-Flowing River Stretches") enabling Member States to report on partial progress towards free-flowing rivers to showcase their efforts in river restoration;
- Scale up river restoration measures in the draft National Restoration Plans to fully use opportunities the new Nature Restoration regulation offers to bring at least 25,000 km of free-flowing rivers across the EU by 2030.

4. Fertiliser Action Plan and Commission announcement to weaken manure limit

Nitrate pollution remains a key pressure on water bodies across the EU and results in high costs for biodiversity, human health and public budgets. More than a third of rivers, lakes and coastal waters are reported as eutrophic⁶, and more than a third of groundwater bodies are polluted by agriculture⁷.

The Nitrates Directive is a key piece of environmental law to protect waters from nitrate pollution from agriculture and is currently under evaluation. We are therefore concerned about the Commission's

announcement, in its Fertiliser Action Plan, to expand the RENURE act to allow also the application of digested manure above the limit set in the Nitrates Directive.

First of all, the extent of nitrate pollution of Europe's waters clearly shows that a decrease in fertiliser application rates is needed. This is also reflected in the Green Deal objective to reduce nutrient emissions by 50% by 2030, with the accompanying objective to reduce fertiliser use by 20% at the same time.

Secondly, the European Ombudswoman has acknowledged that the Commission departed from its own Better Regulation standards in the preparation and adoption of the RENURE act and noted similarities with procedural failings identified in three earlier complaints where she found the Commission had committed maladministration.⁸

We therefore call upon the Water Directors to:

- Oppose the Commission's plans to expand the so-called RENURE act to allow also the application of digested manure above the limit set in the Nitrates Directive;
- Work to improve monitoring and reporting on key indicators in line with the recommendations from the European Court of Auditors⁹;
- Call on your relevant Ministers to abstain from transposing the RENURE act;
- Call for the Nitrates Directive to not be opened for revision so that resources can focus on closing reporting, implementation and enforcement gaps.

Yours sincerely,



Ester Asin,
Director,
WWF European Policy Office
On behalf of *Living Rivers Europe*¹



¹ Living Rivers Europe, a coalition of six environmental and angling organisations: [WWF's European network](#), the [European Anglers Alliance](#), [European Environmental Bureau](#), [European Rivers Network](#), [Wetlands International](#) and [The Nature Conservancy](#).