

PAN Europe's feedback to the Water Framework Directive review and revision

PAN Europe welcomes the opportunity to contribute to the European Commission's call for evidence on the revision of the Water Framework Directive (WFD). The WFD is a foundation of EU water environmental legislation, aiming to (i) prevent the further destruction of European water ecosystems and (ii) achieve a good status for European waterbodies. In doing so, it safeguards healthy water ecosystems, protects human and environmental health, and promotes climate resilience.

The European Commission announced on the 3rd of December 2025 in the [RESourceEU Action Plan Communication on 'Accelerating our critical raw materials strategy to adapt to a new reality'](#) their intention to “*review and revise the WFD, [...] paying particular attention to simplification and the need to address potential bottlenecks in Q2 2026*” – limiting the revision to critical raw materials. This follows the ongoing trend of simplification of EU law and casting a major risk of weakening of the entirety of water protection rules.

The WFD has just been updated to include new key substances in the lists of priority substances for surface and groundwater, including pesticides that pose a health risk for human health and/or the environment. If the revision were to delay further Member States' efforts to begin monitoring these new substances, this would not only be counterproductive, but also disastrous for the future of European waters.

Additionally, should the European Commission decide to proceed with the revision, PAN Europe emphasises that the scope of the proposal should be extremely limited to avoid weakening the environmental objectives of the WFD. Correlatively, any attempts to use this initiative to extend the revision's scope to other sectors, such as agriculture, must be firmly opposed. In fact, the [EU Ombudswoman](#) recently emphasised the dangers of interpreting the term 'urgency' too broadly to justify any legislative changes without conducting impact assessments¹. In this regard, the European Commission must make it clear to co-legislators that should the scope of the WFD revision be widened, it would be prepared to block it using all possible options at its disposal.

PAN Europe has been raising alarms for years about the environmental impacts of pesticide use in agriculture on water quality and biodiversity, calling for stricter and more effective implementation and enforcement of existing EU legislation on pesticides and water. In that regard, the WFD is a key tool – linking with other sectoral policies dealing with pesticides – protecting EU water resources against pollution. In this paper, therefore, in principle, PAN Europe warns against

¹ Living Water Europe, Water Framework Directive review and revision, March 2026 <https://eeb.org/wp-content/uploads/2026/03/Briefing-paper-on-the-Water-Framework-Directive-review-and-revision_formatted-10.03.pdf>

revising the WFD, as this risks weakening the WFD, leading to more pollution and biodiversity destruction and undermining Europe's water resilience. If revised, it must be ensured that the scope should be kept focused on Critical Raw Material and ensure that it does not block the implementation of the updated environmental quality standards, to increase protection of water resources.

In light of the growing urgency to ensure better water protection EU wide, we emphasise the following points relating to the announced revision:

1. There is no evidence supporting the need for simplification of the WFD

The WFD has been assessed “fit for purpose” in the [European Commission’s Fitness Check evaluation in 2019](#). Additionally, the WFD was finally updated, [last month](#), after four years of interinstitutional negotiations – adding key substances such as neonicotinoids (bee-killing), pyrethroids (neurotoxic), or glyphosate, as well as a sum of PFAS, TFA, pharmaceuticals and more, to be monitored across all member states.

Additionally, the [2025 Report of the Commission on River Basin Management Plans and Flood Risk Management Plans](#), which highlights persistent implementation gaps rather than legislative deficiencies and concludes that “*All Member States should increase their level of ambition and accelerate action to reduce the compliance gap as much as possible by 2027*”. This points to the fact that the primary issue lies in insufficient implementation and enforcement, not in the provisions of the Directive.

Given that the WFD's objectives have not yet been achieved, and are more important than ever for the well-being of European citizens, it is crucial that the WFD remains strong and its implementation is strengthened.

2. The WFD is needed to deliver the European water resilience strategy

In the [European Water Resilience Strategy](#), the European Commission highlights that '*achieving water resilience will depend on enhanced implementation of the comprehensive EU water acquis*'. In October 2025, the [European Council conclusions](#) on the EU Water Resilience Strategy also emphasised the urgent need for improved implementation of existing EU water legislation across sectors. Furthermore, the [2025 reports](#) by the European Commission assessing the implementation of the WFD, Floods Directive and Marine Strategy Framework Directive, as well as the [2024 report](#) by the European Environment Agency, highlight that urgent action is required to improve Europe's water resilience.

Indeed, [droughts already affect 20% of Europe](#) each year, and water-related disasters have become more frequent and severe in recent years.

Furthermore, Europe's freshwater resources are widely polluted, with only 26.8% of surface waters meeting the good chemical status standards set by the WFD in 2021. Agricultural pesticide

use is a major contributing factor. While about 14% of groundwater bodies did not achieve good chemical status that year, about two thirds of those affected by pollution were impacted by pesticides. These numbers do not include pollution from trifluoroacetic acid (TFA), which is becoming an urgent threat of [TFA pollution across EU water bodies](#).

Therefore, the announcement of the revision of the WFD only a couple of months after releasing the European Water Resilience Strategy is politically inconsistent – and directly threatens the much needed proper implementation and the achievement of the objectives of the Water Resilience Strategy.

3. A revision undermines efforts to reduce implementation gaps

As previously mentioned, the [2019 Fitness Check of the WFD](#) concluded that the WFD is fit for purpose but requires to be better implemented. Yet the lax approach to enforcement, allowing Member States to miss almost all agreed WFD deadlines so far without real concrete consequences, has contributed to the slow pace of improvements. This is also confirmed by the Commission's [2025 assessment reports](#), which states that implementation gaps are slowing down the efficient protection of European waters.

This announced revision is a continuation of that trend. Amending the WFD at this stage will cause confusion and risks diverting valuable resources away from the Member States' preparations for the next River Basin Management Plans (2028–2033), as well as the work required at EU and national levels to close implementation gaps by 2027. The reopening of core objectives, shifting timelines or weakening obligations increase uncertainty and discourage long-term commitments, thus undermining the WFD's purpose itself.

The European Commission should, where feasible, take appropriate actions to ensure better implementation of WFD by the Member States. Correlatively, there should be no tolerance for Member States not achieving the WFD's deadline of reaching good water status by 2027 – especially since after 2027, Member States will have less options to justify their reasons for not meeting the objectives. Instead, now is the perfect opportunity for Member States to strengthen their actions at the national level to prevent and mitigate water pollution. For instance, [Denmark has already banned several PFAS-pesticides](#), setting the standards of actions for banning pollution at source to prevent the very real and serious threat of PFAS pesticides and TFA pollution in water. Therefore, any attempts to weaken key principles and objectives of the WFD must be strongly opposed, especially at this stage as it undermines the work that has already been done at the both EU and national levels towards better protection of European water resources.

4. Recommendations

We ask the European Commission and co-legislators to:

- Refrain from revising or weakening the WFD;

- Ensure that recently adopted measures take effect: prioritise the full and timely implementation and enforcement of the existing water legal framework (including the recently adopted [proposed act](#) updating the lists priority substances in surface water and groundwater) and the [European Water Resilience Strategy](#);
- Implement better integration between the WFD and other EU legislations such as the Pesticide Regulation, the Sustainable Use of Pesticides Directive e.g. pesticides that are identified as toxic or very toxic to aquatic life with long-lasting effects should be banned, or their use severely restricted;
- Ensure coherence between the WFD and the EU Water Resilience in a way that reinforces environmental objectives.

We urge the European Commission to demonstrate its commitment to Europe's water future by focusing on implementation, enforcement, and support, rather than reopening and risking the dilution of one of Europe's most important environmental laws.

Contact:

- Angeliki Lysimachou, Head of Science and Policy, angeliki@pan-europe.info
- Manon Rouby, Policy Officer & Legal adviser, manon@pan-europe.info

Pesticide Action Network (PAN Europe) is a network of NGOs working to reduce the use of hazardous pesticides and have them replaced with ecologically sound alternatives. We work to eliminate dependency on chemical pesticides and to support safe sustainable pest control methods. Our network brings together over 45 consumer, public health and environmental organisations and women's groups from across Europe.



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