



IGB

Leibniz Institute of Freshwater Ecology
and Inland Fisheries

EU CALL FOR EVIDENCE

EU water policy – targeted revision of the Water Framework Directive

IGB Feedback

13 April 2026

IGB Feedback on the planned targeted revision of the Water Framework Directive

The Leibniz Institute of Freshwater Ecology and Inland Fisheries (IGB) is Germany's largest research centre for freshwaters. Our research findings help to tackle environmental changes and to develop strategies for sustainable water management – true to our guiding principle “Research for the future of our freshwaters”. Based on our research and expertise, we comment on the Call for Evidence on the EU water policy – targeted revision of the Water Framework Directive.

Europe's inland waters provide nature, people and economy and with valuable habitat, ecosystem services and resources. However, the pressure of use is increasing rapidly. It must be emphasised that the resulting conflicts of goals are not limited to the two supposed opposites of protection and use, but also large conflicts of interest between different types of use exist. Therefore, integrative approaches are required to achieve a balanced consideration of ecosystem protection and different resource uses in and around water bodies. **A strong and sustainable European economy requires a strong Water Framework Directive.**

From a science-based point of view, it is correct when the EU itself concludes in the introduction to this Call for Evidence that the Water Framework Directive (WFD) is “the main piece of EU legislation for protecting and improving the status of Europe's waters”. **The WFD is a technically sound, target-oriented policy and tool. It provides one of the most advanced regulatory frameworks for sustainable water management and water protection worldwide. Thus, it is imperative that Member States adhere strictly to the principles, objectives and monitoring obligations of the WFD beyond 2027**, even if the targets have not been met by then. Since the directive came into effect, little improvement to the status of EU water bodies has been observed, which is not related to the goals themselves rather than their poor practical implementation by the respective responsible actors. It is therefore entirely logical that the EU states that a „more effective implementation and enforcement of the EU water legislation is a priority to ensure water security and resilience in the EU in line with the Water Resilience Strategy”.

However, in the context of these implementation shortcomings, it should be mentioned that the main goal of this Call for Evidence „to support a review and targeted revision of the WFD” does not seem to address how the objectives can be achieved more quickly and efficiently, but rather how more weight could be given to specific industrial interests in the WFD context. The official background is the REsourceEU Action Plan – as part of the EU

resilience agenda, which is aiming at accelerating the EU's efforts to secure the supply of critical raw materials. By reviewing the WFD, the EU wants to examine "how to promote circularity and access to critical raw materials in the EU, while protecting the environment and human health."

Harmonizing these goals is not trivial: **Scientific analyses show that use interests, such as from the mining industry, already contribute significantly to severe implementation deficits of the EU water legislation in the Member States. Therefore, it has to be emphasised that a revision of the WFD with potential new exemptions for individual sectors carries the high risk of leading to a slippery slope effect weakening the entire directive and undermining its vital role and objectives for Europe's sustainable development, explicitly including its economy.**

It must be highlighted that for Europe's societies and economy, the most critical resource is freshwater. Man-made climate change and increasing demand for water are drastically reducing its availability in Europe, both with regard to quantity and quality. The situation will worsen, this will not only affect the supply of clean drinking water to the population but also to industry, which requires high-quality water for production processes. The resulting costs will be enormous while at the same time, the loss of biodiversity and the resulting economic consequences become increasingly significant. If the ecosystem services provided by freshwater ecosystems collapse, the economic consequences will be disastrous. It is generally cheaper to avoid or at least to reduce contaminations at the source and protect valuable freshwater ecosystems beforehand than to spend large sums of money at a later stage to attempt to remove widespread contaminations and to restore ecosystems.

Instead of weakening the WFD, the EU should tackle the practical implementation, e.g. by accelerating and improving administrative processes and developing large-scale, integrative concepts. The latter provide promising approaches for analysing, weighting and reconciling the many competing interests between freshwater use and protection. **The WFD offers an excellent basis to ensure this vital and urgently needed balance.**

Sustainable water management must be systematically considered across all relevant policy areas instead of producing competing and contradictory EU legislation in different policy fields. This applies particularly to agriculture, energy (including hydropower), transport (inland navigation), mining and, of course, flood control and nature conservation.

Note: A more detailed science-based assessment of the WFD can be found in the [IGB Policy Brief that was published on the occasion of the WFD fitness check in 2019](#). The diagnoses made in the publication have lost none of their relevance or significance since then.

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Publisher

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IGB, April 2026

EU Transparency Register Number

102473340307-51