

# WATER4ALL POSITION ON THE TARGETED REVISION OF THE WATER FRAMEWORK DIRECTIVE

## ENSURING SCIENTIFIC INTEGRITY, ENVIRONMENTAL PROTECTION AND SOCIETAL VALUE IN SUPPORT OF A SUSTAINABLE AND CIRCULAR EUROPEAN ECONOMY

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### Introduction

Water4All – the Partnership for Water Security for the Planet under Horizon Europe – welcomes the European Commission’s launch of a call for evidence on the targeted revision of the Water Framework Directive (WFD), in the context of the Resource EU Action Plan and the strategic objective of securing access to critical raw materials (CRM).

While acknowledging the importance of strengthening European strategic autonomy and circularity, Water4All stresses that **this initiative introduces potential tensions between resource extraction objectives and the protection of water resources.**

The WFD has provided, for over two decades, a robust and internationally recognised framework for integrated water management. Its core principles, particularly the non-deterioration principle and the achievement of good ecological and chemical status, constitute essential safeguards for aquatic ecosystems, public health, and economic activities dependent on water resources.

In this context, any targeted revision of this framework therefore requires particular care to ensure that its key principles, objectives, and achievements are preserved and strengthened, rather than inadvertently weakened.

As a research and innovation (R&I) partnership mobilising a wide, multidisciplinary scientific community, Water4All considers that **sound, transparent, and high-quality scientific evidence must lie at the core of the review process**, alongside societal and economic values, environmental integrity, feasibility considerations, and public acceptability.

### Preserving the Core Achievements of the Water Framework Directive

Water4All underlines that the WFD represents one of the most ambitious and comprehensive environmental legislations globally. Its added value lies in its ecosystem-based approach, long-term vision, and legally binding objectives, notably the prevention of water body deterioration and the achievement of good ecological and chemical status.

In this context, Water4All stresses that:

- The revision must **fully preserve the non-deterioration principle**, which remains a cornerstone of EU water policy
- The targeted revision should **not result in deregulatory outcomes** or weaken environmental protection standards.
- Economic or industrial objectives, including access to critical raw materials, must **not override the WFD’s fundamental environmental and public health protections.**
- Policy coherence must be ensured not only within water legislation, but also with other key environmental frameworks, in particular the EU Green Deal, the Zero Pollution Action Plan, the Circular Economy Action Plan, biodiversity objectives and the Nature Restoration Law.

Any revision of the WFD should explicitly avoid creating inconsistencies or trade-offs that could undermine the objectives of these frameworks, especially in relation to ecosystem restoration and long-term environmental resilience.

Safeguarding the integrity of the WFD is essential for maintaining trust among Member States, stakeholders, and citizens, and for ensuring the long-term sustainability of water-dependent economic sectors, including industry, agriculture, and energy.

### Scientific Evidence as the Core Driver of the Review Process

**The accelerated development of critical raw materials value chains presents significant risks to water security**, which must be fully integrated into EU policy implementation. Mining and processing activities are inherently associated with significant water-related risks, including pollution, over-abstraction, and long-term ecosystem degradation. These risks are particularly critical in the context of increasing water scarcity across Europe. **Without strong safeguards, the acceleration of CRM activities could directly conflict with the objectives of the WFD.**

Water4All therefore emphasizes that **no trade-off should be accepted that compromises the non-deterioration of water bodies or long-term water resilience.**

Water4All stresses that **the review process must be science-informed and science-led.** Policy choices must be grounded in robust, multidisciplinary scientific evidence, reflecting the complexity of water systems and their interactions with industrial activities.

Water4All therefore calls for:

- The systematic mobilisation of **the best available scientific knowledge**, including results from EU-funded research and innovation programmes.
- The use of **multidisciplinary and transdisciplinary approaches**, integrating natural sciences, engineering, social sciences, economics, and governance studies.
- Explicit recognition and transparent communication of **scientific uncertainties, methodological constraints, and system boundaries**, rather than oversimplification of complex evidence.

Scientific advice should not be selectively used to justify predetermined policy objectives, but rather serve as a robust foundation for balanced and informed decision-making.

### Ensuring Scientific Quality, Integrity and Transparency

Water4All emphasizes that the **quality and integrity of scientific evidence** underpinning the review process are critical. This requires robust governance arrangements for evidence collection and assessment.

In particular, Water4All recommends:

- **Transparent procedures** for identifying, selecting, and synthesising scientific inputs, including **clear criteria for quality assurance.**
- Explicit treatment of **uncertainties, knowledge gaps, and competing scientific interpretations.**
- Open discussion of **trade-offs** between environmental protection, resource efficiency, technological feasibility, and socio-economic impacts.
- Clear distinction between **peer-reviewed scientific evidence, expert judgement, and stakeholder opinions.**
- **Independence** of environmental impact assessments related to CRM projects, avoiding conflicts of interest and guaranteeing robust, science-based evaluation processes

Such transparency is essential not only for policy robustness, but also for public trust in the review process and its outcomes. This includes the systematic publication of monitoring data in line with **FAIR principles (Findable, Accessible, Interoperable, Reusable)**, enabling open access, reproducibility of analyses, and informed public scrutiny.

### Inclusiveness Beyond Lobbying Interests

Water4All considers that the legitimacy and credibility of the targeted revision depend on the **balanced involvement of a wide range of actors**, beyond sectoral or lobbying interests.

The consultation and evidence-gathering process should therefore:

- Actively involve **recognised scientific institutions, research infrastructures, and independent experts**.
- Include **water authorities, environmental agencies, civil society organisations, and representatives of affected communities**.
- Ensure that **societal and environmental values** are considered alongside economic and industrial interests.

Water governance is intrinsically linked to public interest, and decisions affecting water resources must reflect a broad societal consensus, not merely the interests of a limited number of stakeholders.

### Addressing Circularity and Critical Raw Materials in a Systemic Way

Water4All recognises the importance of circular water use, resource recovery, and innovative solutions for reducing environmental pressures and increasing strategic autonomy. However, such objectives must be addressed **within a systemic and precautionary framework**.

In this regard:

- Circularity strategies must be assessed for their **cumulative impacts** on water quantity and quality, ecosystems, and downstream users.
- Water-related pathways for critical raw material recovery should be evaluated using **life-cycle and system-level analyses**.

Research and innovation can play a key role in identifying win-win solutions, but should not be used to justify premature or insufficiently tested regulatory relaxation.

### The Role of Research and Innovation

Water4All highlights that **targeted research and innovation investments are essential** to support evidence-based policymaking in this area. R&I can:

- Improve understanding of environmental thresholds and cumulative impacts.
- Develop monitoring, modelling, and decision-support tools.
- Explore governance and regulatory approaches that balance flexibility with protection.
- Support adaptive management under conditions of uncertainty and climate change.

In this context, the **Water4All Partnership can play a key enabling role in supporting the sustainable development of critical raw materials value chains**. Through its transnational research and innovation agenda, Water4All contributes to advancing knowledge, tools and solutions for integrated water resource management, pollution prevention and monitoring, and water-efficient industrial processes. This includes

the development of innovative approaches to reduce water use in extractive industries, improve treatment and reuse of industrial water, and assess cumulative impacts at river basin scale. Leveraging Water4All's expertise and networks can support evidence-based decision-making, ensuring that CRM projects are designed and implemented in line with water resilience objectives. Strengthening the interface between raw materials policy and water research and innovation initiatives such as Water4All is therefore essential to guarantee that **strategic autonomy in raw materials is achieved without compromising Europe's water resources**.

The Partnership stands ready to contribute scientific knowledge, networks, and expertise to support the Commission and Member States throughout the review process.

### Conclusions and Key Messages

**Water resilience should be recognised as a prerequisite, not a constraint, for achieving Europe's strategic autonomy in critical raw materials.**

Water4All welcomes the opportunity to contribute to the reflection on the future of EU water legislation. The Partnership underlines that:

- The Water Framework Directive remains must a non-negotiable cornerstone of EU environmental policy and must not be weakened.
- Scientific evidence, integrity, and transparency must be central to the review process.
- Multidisciplinary approaches and explicit handling of uncertainty are essential.
- Stakeholder engagement must go beyond lobbying interests, reflecting societal and environmental values.
- Circularity and access to critical raw materials must be pursued in a systemic, precautionary, and sustainable manner.

Water4All strongly encourages the European Commission to ensure that this targeted revision consolidates, rather than compromises, Europe's long-term water resilience, environmental protection, and societal well-being. This revision must **strengthen – not weaken – Europe's capacity to protect its water resources**, which are fundamental to its environmental sustainability, economic development, and societal well-being.