



**To: Søren Jacobsen, Ambassador, Deputy Permanent Representative to Coreper I**

**Re: Swift and ambitious actions needed for the update of EU water pollution standards**

Brussels, 15 July 2025

Dear Danish Representative to COREPER I,

We, the undersigned representatives of environmental and health civil society organisations, healthcare professionals, social partners, recreational fishing associations, and businesses relying on clean and healthy water, are writing to you to urge the prompt adoption of the proposed new EU water pollution standards<sup>1</sup>. With this letter, we are also expressing our deep concern about ongoing attempts to weaken and delay the implementation of the Water Framework Directive (WFD).

The European Environment Agency's recent State of Water report revealed that less than 30% of surface water bodies meet good chemical status. [PFAS pollution is skyrocketing](#), with about half of rivers, up to one third of lakes and 47-100% of transitional and coastal waters exceeding the current annual average environmental quality standards ([EQS](#)) for PFOS. This is raising important concerns for public health and safety. While disheartening, this does not paint the full picture of water pollution, as Member States are not currently obligated to assess compliance with the priority substances added in 2013 in the chemical status assessment<sup>2</sup>.

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

<sup>2</sup> This is because in the latest update of priority substances in 2013, Member States were given until 2027 to comply with the updated quality standards.

Almost three years after the Commission's proposal to update the lists of priority pollutants for surface and groundwater, it is therefore urgent for the EU to close the regulatory gap and take action to prevent further water pollution from PFAS, pesticides, and pharmaceuticals. Scientific evidence is not the only driving force: there is also strong public demand, as highlighted by the latest Eurobarometer survey on Europeans' attitudes towards the environment, which shows that 78% of Europeans want the EU to take greater action to address water pollution.

From this perspective, we do not support the Council's proposal to include new exemptions to Article 4 of the WFD for temporary deterioration and for allowing deterioration following relocation of water or sediment. The current exemption under Article 4(7) offers sufficient flexibility to accommodate projects of overriding public interest or sustainable development projects, while not jeopardising the objectives of the WFD. As the recently launched Water Resilience Strategy recalls, the implementation of the WFD is essential to ensure good quality water remains available in sufficient quantity for human uses. Furthermore, as highlighted in the European Ocean Pact, adopted in June this year, "a significant reduction of pollution, including microplastics, PFAS and other chemicals, is essential to reinforce the Ocean's health".

Instead of introducing further loopholes in the water legislation, upholding water quality standards is instrumental to build water security in our continent - and deliver a stable legal environment.

As Member States are starting to draft their 2028-2033 River Basin Management Plans (RBMPs), they need urgent clarity on which rules to apply. A delay in adoption could result in a material impossibility for Member States to take the updated lists of pollutants into account in their plans – resulting in a six-year delay in the monitoring and pollution prevention of the new substances. Therefore, a swift adoption of the new pollution standards and a legal requirement for Member States to include measures to tackle the new pollutants in the next RBMPs are necessary. Some Member States are already planning to do so, but only with joint minimum rules can EU water protection objectives be achieved, due to the transboundary nature of many water bodies.

Scientists have identified over 500 chemicals in European rivers, many of them in complex mixtures, with 75% of samples exceeding risk levels for aquatic life<sup>3</sup>. Meanwhile, new monitoring techniques are available to better capture chemical pollution, including effect-based monitoring (EBM) that captures the combined effects of substances with similar modes of action. The proposed update by the European Commission is essential to address concerning and rising water pollution issues, including mixture effects, while promoting the uptake of scientific and technological advances.

We therefore call on you to:

- Ensure timely action by requiring Programmes of Measures (PoM) for new substances to be incorporated into the 4th RBMPs (2028–2033). As a minimum, ensure that Member States present preliminary PoMs by 2030.
- Uphold existing water protection rules and oppose new exemptions to the WFD, and at a minimum, maintain the same safeguards as in the existing Art 4.7.
- Support the Commission's proposal of 18 months transposition period.
- Maintain a science-based and pragmatic approach by extending the sum of 24 PFAS to 100 individual PFAS, using the Relative Potency Factor (RPF) approach. This should include the PFAS

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<sup>3</sup> [Mapping chemical footprints in European streams](#), March 2024.

metabolite trifluoroacetic acid (TFA) for surface and groundwater, as recommended by the SCHEER Committee<sup>4</sup>.

- Uphold ambition on groundwater protection by opposing the Council's proposals to align the groundwater PFAS threshold with the Drinking Water Directive and to align pharmaceutical groundwater quality standards with those developed for surface water<sup>5</sup>.
- Support the introduction of effect-based monitoring (EBM) of estrogenic substances as a mandatory measure in the 4th RBMPs, as this tool is vital for the detection of hazardous pollutants.
- Ensure that strict monitoring practices are followed for any ubiquitous persistent, bioaccumulative, and toxic (uPBT) substance that is still authorised and in use or actively emitted by the Union.

Safeguarding Europe's water resources requires preserving the integrity of the Water Framework Directive, upholding a robust and predictable regulatory framework, and ensuring its effective implementation.

Signatories:

Child Rights International Network (CRIN)

European Environmental Bureau

European Public Service Union (EPSU)

European Rivers Network (ERN)

European Anglers Alliance (EAA)

European Fishing Tackle & Trade Association (EFTTA)

European Molluscs Producers' Association (EMPA)

European Water Movement (EWM)

Health Care Without Harm Europe (HCWH)

Pesticide Action Network Europe (PAN)

Seas at Risk (SAR)

Surfrider Foundation Europe (SFE)

Wetlands International- European Association (WI-EA)

WWF EU

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<sup>4</sup> [Scientific Opinion on "Draft Environmental Quality Standards for PFAS total under the Water Framework Directive", April 2025.](#)

<sup>5</sup> This would be counter [recommendations from the European Medicine Agency](#)