

To:

Commissioner Jessika Roswall, Environment, Water Resilience and a Competitive Circular Economy

Cc:

Executive Vice-President Teresa Ribera Rodríguez, Clean, Just and Competitive Transition

Executive Vice-President Stéphane Séjourné, Prosperity and Industrial Strategy

Executive Vice-President Raffaele Fitto, Cohesion and Reforms

Commissioner Wopke Hoekstra, Climate, Net Zero and Clean Growth



Brussels, 20 May 2025

Re: Living Rivers Europe recommendations to strengthen the Water Resilience Strategy

Dear Commissioner Roswall,

We, the undersigned members of the Living Rivers Europe coalition¹, stand ready to support the European Commission's efforts to develop a Water Resilience Strategy that responds to the growing urgency of water scarcity, floods, pollution, and ecosystem degradation across the continent. With droughts, floods and pollution already costing European households, businesses and ecosystems billions of euros every year, this strategy is the moment to pivot from piecemeal responses to a coherent, future-proof water policy that is working with nature, not against it.

We recognise several encouraging signals in the strategy's direction, as presented by the Commission services recently during the Expert Group meetings — including the promotion of nature-based solutions, the proposal for an EU Sponge Facility, the recognition of PFAS as a systemic risk, to name just a few.

However, based on recent media reports and our understanding of the strategy's current content, **we are concerned that it lacks the binding commitments, dedicated funding, and governance tools needed to ensure meaningful implementation and systemic change**. Without those, ambition will remain on paper and will not be able to tackle growing pressures on Europe's rivers and wetlands.

In particular, there are **five adjustments that would give the final strategy the tools, funding and legal traction it needs to succeed**.

1. Define *water resilience* in clear, science-based^{2,3} terms

Water resilience is the EU's ability to maintain the core functions of its water systems — rivers, groundwater aquifers, wetlands, soils and built networks — under shocks such as droughts, floods and pollution, as well as long-term stresses from climate change and socio-economic shifts. It means protecting the ecological processes that regulate water quantity and quality, buffering against extremes, and creating governance and investment pathways that keep water systems within safe ecological limits. It is essential that the Strategy establishes a scientifically robust definition of water resilience, anchored in the concept of good chemical and ecological status and minimum environmental flows. This will ensure that resilience addresses scarcity, flooding and pollution, while remaining fully measurable under existing Water Framework Directive (WFD) obligations. The Strategy actions will then need to be checked to determine whether they are coherent with the definition and if they are really contributing to making the EU more water resilient.

¹ Living Rivers Europe, a coalition of five environmental and angling organisations: WWF's European network, the European Anglers Alliance, European Environmental Bureau, European Rivers Network, The Nature Conservancy and Wetlands International Europe. We represent a movement of over 40 million people across Europe and, together, we started the #ProtectWater campaign.

² Malin Falkenmark, Lan Wang-Erlandsson, Johan Rockström (2019). *Understanding of water resilience in the Anthropocene*. Journal of Hydrology X, Volume 2, 100009. <https://doi.org/10.1016/j.hydroa.2018.100009>

³ Shandiin Rodina (2019). *Defining water resilience: debates, concepts, approaches and gaps*. WIREs Water, Volume 6, Issue 2. <https://doi.org/10.1002/wat2.1334>

2. Strengthen water abstraction controls with basin-level sustainability targets

Resilience cannot be built on depleted and over-extracted rivers and aquifers. The strategy should guide Member States (and water users) towards maintaining abstraction within sustainability limits - defined as levels that safeguard ecological flows, long-term water availability, and the resilience of essential uses under climate stress. To support this shift, the Commission should:

- require Member States to define sustainable abstraction levels at river basin scale, based on ecological flow needs under the WFD, and to integrate these levels into their fourth River Basin Management Plans (RBMPs), including a systematic review and adjustment of existing permits;
- provide direction by referencing existing EU benchmarks, such as the **2011 EU Roadmap to a Resource Efficient Europe**, which proposed that abstraction targets stay below 20% of available renewable water resources;
- ensure that the 2025-2026 Structured Dialogues focus on improving water allocation and enforcing abstraction controls in over-stressed basins, with a strong emphasis on ecological flows; civil society and scientific experts must be meaningfully included to guarantee transparency, accountability and alignment with environmental objectives;
- require Member States to establish strategic water reserves — surface and groundwater bodies maintained in or restored to good status — to serve as buffers for critical human needs and ecosystem functions in times of scarcity.⁴

3. Fund Nature-based Solutions (NbS) as the backbone of resilience

Wetlands, floodplains and healthy soils offer cost-effective and climate-resilient protection against drought, flooding and water pollution — yet engineered supply options still dominate EU investment. The strategy should:

- elevate the proposed *Sponge Facility* to a flagship initiative under next Multiannual Financial Framework (MFF), with a dedicated multi-year EU budget and clear performance indicators;
- prioritise restoration of water retention in ecosystems under cohesion policy, eco-schemes under the Common Agricultural Policy (CAP), and InvestEU funding lines subject to final agreement on the MFF;
- follow water hierarchy and ensure that EU-supported infrastructure projects, including reservoirs and desalination plants, are subject to environmental safeguards, and demonstrate that NbS have been fully assessed as first-line options.

4. Tackle PFAS at the source: phase out first, clean up second

PFAS pollution is contaminating drinking water sources and ecosystems across Europe, with rising treatment and remediation costs increasingly falling on citizens. A credible water resilience strategy must prioritise prevention at the source and enforce strong accountability for polluters. We urge the Commission to:

- ensure that measures to address PFAS focus on upstream prevention, not just end-of-pipe treatment;
- reinforce the application of the Polluter Pays Principle (PPP), ensuring that industry bears the full cost of monitoring, treatment and remediation - not water service providers or citizens.

5. Close implementation gaps and eliminate harmful subsidies

The Water Resilience Strategy must go beyond business as usual and set the conditions for meaningful implementation. We urge the Commission to:

- commit to timely enforcement of WFD obligations, especially where environmental flow standards and quantitative status are not being met;
- signal a clear direction to phase out harmful subsidies under the CAP, cohesion policy and state aid that incentivise over-abstraction or drainage, and redirect support toward nature-positive practices;
- work with the European Investment Bank and national promotional banks to prioritise financing for NbS and ecosystem restoration — including through biodiversity credit pilots that leverage private investment for wetland recovery;

⁴ WWF European Policy Office (2023). Adapting to the Climate and Water Crises: Joint Position Paper for a Water-Resilient Europe. Brussels. Available at https://wwfeu.awsassets.panda.org/downloads/climate-and-water-crisis-report_web-final.pdf

- ensure coherence with the Nature Restoration Regulation, Flood Risk Plans, CAP Strategic Plans and forthcoming Port and Marine strategies, creating a truly integrated source-to-sea resilience agenda;
- properly implement the PPP across all relevant EU policies - it's time to move from debate to its implementation and enforcement.

Europe cannot afford a blueprint that looks ambitious on paper, yet lacks the mechanisms to deliver. By embedding the elements above rooted in a robust, science-based definition, the Water Resilience Strategy will put the EU on track to secure water for people, nature and the economy in a changing climate.

The Living Rivers Europe coalition stands ready to contribute its technical expertise and would welcome the opportunity to discuss these recommendations with your services ahead of finalisation.

Yours sincerely,



Ester Asin
Director, WWF European Policy Office, on behalf of the Living Rivers Europe NGO coalition