

To: Environment Ministers of EU Member States

Cc: Commissioner for the Environment, the Chair of the European Parliament Environment Committee

Concerning: Input to the informal meeting of the Ministers of Environment and ministerial water conference, Bucharest, 20-22 May 2019

Brussels, 14 May 2019

Dear Minister,

On behalf of the Living Rivers Europe, we would like to share with you our views on some of the issues on the agenda of the forthcoming informal meeting of the Ministers of Environment and the ministerial water conference in Bucharest on 20-22 May 2019.

During the high-level segment of the ministerial water conference you will discuss the future of the EU water policy and the ongoing Fitness Check evaluation of the EU Water Framework Directive (WFD) and related legislation. We urge you to support maintaining the high level of ambition and the environmental objectives set in the WFD and step up the efforts in the next river basin management cycle in 2021-2027 to bring our rivers, lakes and wetlands to the desired ecological state by 2027.

We believe the Water Framework Directive is fit for purpose and 19 years of its implementation demonstrate that where political will exists, the WFD provides an effective framework for addressing the main pressures facing our freshwater ecosystems such as agricultural pollution or loss of habitat due to hydropower production¹. The urgency to protect and restore our freshwater ecosystems and bend the curve of freshwater biodiversity loss has recently been highlighted in the global assessment by the Intergovernmental Science-Policy Platform on Biodiversity and Ecosystem Services (IPBES) which concluded that freshwater ecosystems are showing the highest rate of decline.

We are particularly concerned that according to the positions on the WFD published to-date by the national and EU associations representing interests of the agriculture, industry, hydropower and mining sectors, the industry stakeholders conclude that the current legal framework is too ambitious and ask for the relaxation of the key principles of the WFD such as “non-deterioration obligation’ or ask for exempting specific economic activities from the WFD cost recovery or water pricing requirements. Given that water fuels all economic sectors, it should come as no surprise that the aforementioned industry groups are making the most of the review process to ensure that they can continue “business as usual” - that is, that they will not need to adapt their current practices but continue and even expand practices which pollute freshwater ecosystems and destroy their natural shape, flow, integrity and functioning. If ever put into effect, their proposals would seriously compromise any efforts made so far by the national governments, regional authorities, civil society, but also more progressive businesses, to protect and restore EU freshwater ecosystems.

¹ More detailed information around the current pitfalls in the implementation of the WFD can be found in the publication *Bringing life back to Europe's waters: The EU water law in action* (WWF, EEB, European Rivers Network, European Anglers Alliance, 2018, <http://www.wwf.eu/?uNewsID=334981>)

We are also concerned that some proposals discussed by the Water Directors of the EU Member States mirror the wish list of the various industry and agriculture lobby groups and question the cornerstones which make the WFD fit for purpose, such as the “one-out, all-out principle”, and ask for postponing the deadlines for achieving the WFD objectives or changing the “non-deterioration” obligation among others.

This is at odds with the scientific evidence and the sustainable future citizens across the world have been so vocally demanding, not least through the civil society-led #ProtectWater campaign, during which more than 375,000 citizens expressed their wish for the WFD to remain unchanged.²

We believe that the WFD provides all the tools needed to significantly improve sustainable water management in Europe and ensure people, the economy and nature have a decent supply of good quality water now and in the future. And whilst some progress has been made over the 19 years the legislation has been in effect, the EU is not on track to bring Europe’s rivers, lakes, wetlands, streams, groundwater, transitional and coastal waters to good health by 2027 unless efforts are significantly stepped up. We are concerned that if the decision is made to amend the WFD, this will create the unnecessary legal uncertainty and shift the focus away from developing, implementing and financing more effective and ambitious measures to tackle the main pressures and bring our water environment to health by 2027.

Thus, we urge you not to align yourself with the positions of vested economic interests who are putting forward proposals to grant themselves greater flexibility - flexibility to develop and roll out practices which, far from being in line with the sustainable future citizens so vocally demand, would keep us locked in a destructive and unsustainable present and foreseeable future. We urge you instead to maintain the ambitious legal framework and focus on its adequate implementation as a matter of utmost priority and urgency.

We enclose our latest publication on the position of several industry and agriculture lobbies as well as those discussed by some officials for your attention.

Thank you in advance for your consideration of these points for your discussion in Bucharest.

Yours sincerely,



Jeremy Wates
Secretary General, EEB

On behalf of:
European Anglers Alliance, European Rivers Network, European Environmental Bureau, Wetlands International and WWF

² Living Rivers Europe, 2019, “375,000+ Citizens tell the European Commission ‘Hands off our Water Law!’”, https://wwf.panda.org/_/search_wwf_news/?344893/375000-Citizens



Living Rivers Europe is a coalition of the following environmental groups who represent a movement of over 40 million people across Europe. Together, we work to safeguard the EU water law – the Water Framework Directive (WFD) – and strengthen its implementation and enforcement.



WWF

WWF is one of the world's largest and most experienced independent conservation organisations, with over 30 million followers and a global network active in nearly 100 countries. WWF's mission is to stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature, by conserving the world's biological diversity, ensuring that the use of renewable natural resources is sustainable and promoting the reduction of pollution and wasteful consumption.



Wetlands International

Wetlands International is the only global not-for-profit organisation dedicated to the conservation and restoration of wetlands. We are deeply concerned about the loss and deterioration of wetlands such as lakes, marshes and rivers. Our vision is a world where wetlands are treasured and nurtured for their beauty, the life they support and the resources they provide.



ERN

The European Rivers Network (ERN) seeks to promote the sustainable management of living European rivers and water, as opposed to the exploitation, pollution and degradation that has occurred in the past. Founded in France in 1994, ERN aims to link groups, organisations and people in the fifty major rivers basins in Europe to improve communication (environment, culture, education and human rights) to protect and restore the basic equilibrium of rivers and aquatic environments. ERN implements its own projects in France and transboundary rivers in Western Europe.



EEB

The EEB is Europe's largest network of environmental citizens' organisations. We bring together around 140 civil society organisations from more than 30 European countries. We stand for sustainable development, environmental justice & participatory democracy.



EAA

The European Anglers Alliance (EAA) is a pan-European organisation for recreational angling. Its mission is to safeguard the fish stocks and fisheries of Europe, and to protect the interests of all those who fish with rod and line for recreational purposes. There are about 3 million affiliated members to EAA's 16 member organisations and affiliates from 14 European nations.

