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Position Paper

**Building towards a Water Conscious Future
Key Recommendations for a European Water Resilience Strategy**

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Key recommendations for a European Water Resilience Strategy

SGI Europe, a cross-sectoral EU social partner representing providers of services of general interest (SGIs) and public services, welcomes the European Commission's announcement to establish a **European Water Resilience Strategy (EWRS)**. The EWRS has the potential to position water resilience as a key consideration across sectors while maintaining robust protection of water bodies and to serve as a new cornerstone for EU policymaking. The aim of the **initiative should be to achieve a strategic and action-oriented water agenda**. SGI Europe believes there is an urgent need to address the growing water-related challenges across Europe, which are increasingly intense and diverse in nature, primarily due to climate change and the additional growing water demand from industries, the agricultural sector and households. Events like droughts and floods, as well as pollution, are affecting different regions in varying ways, and a strategic approach is essential to prepare effectively.

The EWRS should, therefore, serve as a clear guide to tackle these issues, providing the necessary structural and political direction to meet the challenges ahead.

SGI Europe wishes to bring forward the following key recommendations:

- **Implement EU water and environmental legislation coherently:** SGI Europe urges for the **coherent implementation of existing EU water legislation, supporting the principles of protection, prevention at source and polluter-pays principle** to ensure building water resilience in the face of climate change evolving risks.
- **Prioritising pollution prevention at the source:** Preventing water pollution at the source, enforcing the polluter-pays principle, and using nature-based solutions for water management are essential for improving water quality, reducing treatment costs, and promoting sustainable, equitable practices in water resource management.
- **Adopt a transboundary approach to water management while ensuring water protection in regions:** Water resilience in the EU requires cross-border cooperation, strengthened river basin commissions, and binding agreements to address shared water challenges, ensuring sustainable supply and quality through data sharing and coordinated efforts across international river basins.
- **Safeguard oversight by public authorities over water resources:** Recognising the interdependence of water quality and quantity, policies in these areas should be synergistic, ensuring progress in one does not compromise the other. **SGI Europe pleads that the responsibility for water resources by public authorities in close cooperation with the water operators for their management is key for enabling swift, equitable responses to water crises**, ensuring long-term resilience over short-term economic interests.
- **Member States will be called to strengthen water infrastructure:** Water companies and public authorities are at the forefront of addressing challenges related to aging infrastructure, climate change, and water scarcity. **Member States must prioritise significant investments in water infrastructure to address water scarcity, climate change and aging infrastructures both at the national and the European level (e.g via the Multiannual Financial Framework)**. Large water collection and storage systems, renewal of supply, distribution networks, cost-efficient nature-based solutions for natural water storage, new sources of water supply, as well as decentralised plants and localised infrastructure will, differing per Member State, require significant extra investment. Member States may ensure these investments through mechanisms like taxes, tariffs, and the polluter-pays principle, in line with the Water Framework Directive.

Introduction

Creating a water-conscious future will prioritise sustainable management and use of water resources through collective preventions, awareness, responsible practices, and proactive policies. In such a future, individuals, communities, companies, and governments must recognise the intrinsic value of water and the need to protect it for current and future generations. **Collaboration with different stakeholders is an effective way to promote the importance of water as a fundamental resource and responsible behaviour in society.** This awareness translates into everyday actions such as reducing water leaks, conserving water through efficient technologies, and protecting natural water sources from pollution. Educational initiatives promote understanding of the importance of water conservation, while regulatory frameworks enforce responsible water use. **Collaboration among stakeholders ensures equitable access to clean water, encourages innovations in water management, creates synergies and strengthens the sense of responsibility in the long term.** The EWRS has to outline a path for this vision and propose concrete measures and steps to achieve it.

The EWRS must become a cornerstone of sustainable water management across the EU respecting existing EU water legislations and frameworks. A strong, coordinated approach with the European Commission and Member States respecting public interest through public authorities over water resources, with actions guided by the subsidiarity principle to empower Member States, local and regional authorities to address their specific water challenges.

Based on this narrative, SGI Europe wishes to bring forward the following recommendations for a sustainable and robust EWRS.

Implement EU water and environmental legislation coherently

Effective water resilience requires the coherent implementation of existing EU water and environmental legislation. This includes more effective enforcement of existing legislation to mitigate pressures on water quality and availability from key sectors. With the recently published **State of Water in the European Union in February 2025**, the need to improve water standards is still high. Indeed, the report shows that, despite significant efforts such as improved monitoring and increased funding, **critical challenges remain.**

Only 39,5% of surface water bodies in the EU have achieved good ecological status, and water scarcity is an escalating concern. The ongoing contamination by toxic pollutants, such as mercury, underscores the need for enhanced compliance with existing EU water laws, particularly in controlling nutrient pollution from agriculture and managing wastewater discharge. This concern must be addressed and highlighted in the strategy.

For SGI Europe, the **Water Framework Directive (WFD)** should remain the central framework, as well as **incorporating protection, prevention at source, and the polluter-pays principles (TFEU, Art. 191 (2)).** Furthermore, the urban wastewater management standards must be supported by **implementing accurately the revised Urban Wastewater Treatment Directive (UWWTD)**, especially in regard to the introduction of the **polluter-pays principle** and the **extended producer responsibility (EPR) scheme** and **nature conservation efforts** must align with responsible water use.

In agriculture, sustainable practices must reduce nutrient surplus and pesticide use, as well as increase transparency over water usage. **Stricter restrictions on chemical-intensive industries are essential** to address pollutants like PFAS and pharmaceuticals. Industry in general has to **abide by best available practices for used technology as outlined in the Industrial Emissions Directive.**

SGI Europe strongly urges that the upcoming EWRS focuses on the coherent implementation of existing EU water legislation. It is essential that **Member States adhere strictly to pollution limits, ensure adequate funding, and adopt measures to tackle persistent issues such as chemical pollution and drought.**

Moreover, in the context of the **circular economy**, water utilities are already recovering various resources from their processes, such as energy, biomethane, organic compounds, and nutrients. It is essential that new legislation related to the circular economy supports and accelerates the market adoption of these products (such as biogas, recovered phosphorus, biosolids), thereby encouraging long-term investments and ensuring the affordability of water services. Currently, many **material recovery activities are not economically viable because the costs exceed market prices.** In this regard, and in line with the Draghi Report on EU competitiveness, it is **crucial to promote a well-functioning, integrated internal market for secondary raw materials and to support further action** and regulation that encourage the use of high-quality recovered products.

Prioritising pollution prevention at the source

The key to ensuring the quality of water is to prevent pollution at the source. **Source control and prevention is always more efficient than end-of-pipe measures.** Article 7.3 of the WFD touches upon prevention and states that “Member States shall ensure the necessary protection for the bodies of water identified with the aim of avoiding deterioration in their quality in order to reduce the level of the purification treatment required in the production of drinking water”. In practice, abiding by this article seems more complex as (new) persistent, mobile and toxic (PMT) substances, like PFAS, appear more often. Challenges for existing pollution by pesticides and nitrates also remain unanswered, making drinking water production even more challenging. Herewith, control at source measures – like a universal PFAS ban – is of paramount importance.

Additionally, **the polluter-pays principle must be extended and rigorously enforced in line with the cost recovery of the WFD (Art. 9 (1)) and the TFEU.** Industries and sectors responsible for pollution should bear the financial responsibility for cleanup and the associated impacts on drinking water supplies. This ensures that the costs of pollution control do not fall disproportionately on water utilities and consumers, promoting fairness and accountability.

Nature-based solutions should play a central role in improving water quality, water quantity and resilience. Sustainable land use in agriculture, forests and cities, restoring wetlands, creating riparian buffer zones, and implementing green infrastructure can naturally prevent or filter pollutants and enhance biodiversity. These approaches improve water quality (instead of costly end-of-pipe technology in waterworks) and contribute to climate adaptation by mitigating the effects of flooding and drought at low costs. Nature-based solutions to water storage and natural water retention measures should be leveraged for water quantity, as proposed in the outcome of the Strategic Dialogue on the Future of EU Agriculture.

Adopt a transboundary approach to water management while ensuring water protection in regions

Water resilience in the EU also demands a transboundary approach. Water does not stop at borders. Therefore, **cross-border cooperation is necessary in relation to agreements dealing with water distribution and the management of the major European rivers.** Here, it is essential to map (system) dependencies to ensure sustainable water supply. **Greater data sharing, best practice exchanges, and coordinated efforts through strengthened river basin commissions – such as the International Commission for the Protection of the Rhine (ICPR), the International Meuse Commission (IMC), and**

the International Commission for the Protection of the Danube River (ICPDR) – are vital for cross-border water management.

International river basins across Europe are literally and figuratively connected to each other. Within river basins, problems in the European water system can be passed on to downstream areas or future generations. At the moment, there are still too few binding agreements in river basins to meet the challenges of the future. **It is wise to make these agreements before the problem becomes too critical.** The moment water becomes increasingly scarce, it will become increasingly difficult to make good agreements. Meanwhile, robust protections for water quality and quantity in individual regions must be seen as an integral part of water resilience.

Safeguard oversight by public authorities over water resources

Recognising the interdependence of water quality and quantity, policies in these areas should be synergistic, ensuring that progress in one does not compromise the other. SGI Europe pleads that the responsibility for water resources by public authorities in close cooperation with the water operators for their management is key for enabling swift, equitable responses to water crises, ensuring long-term resilience over short-term economic interests.

Europe's heterogenous organisation of the drinking water and wastewater sector should therefore be acknowledged and taken into account in the upcoming strategy, **with the aim of ensuring access to the essential resource of water for all and guaranteeing the right combination of ecological, social and economic interests for present and future generations.** Experience shows that the European heterogenous organisation models of services of general interest create a strong link between customers and their water resources and adequately account for geographical differences and local challenges. Ultimately, water must remain a public and accessible good to all.

Member States will be called to strengthen water infrastructure

The challenge of **resilience will require huge investments in water infrastructure demanding more priority both at the national and the European level (through European funding, also within the MFF).** Water companies and public authorities are at the forefront of addressing the consequences of water scarcity, climate change, and aging infrastructure.

For this purpose, it is essential that Member States ensure the necessary investment. **Large water collection and storage systems, renewal of supply, distribution networks, cost-efficient nature-based solutions for natural water storage, new sources of water supply, as well as decentralised plants and localised infrastructure will, differing per Member State, require significant extra investment.**

Hence, observing the subsidiarity principle, Member States could be called upon to secure the necessary funding, according to the Water Framework Directive Article 9 cost recovery using instruments like taxes, tariffs, polluter-pays principle and other cost-reducing measures.

Conclusion: Safeguard oversight by public authorities over water resources and responsibility for the management in services of general interest to ensure equitable and specific responses

The EWRS must prioritise sustainable water management through **coherent enforcement of EU legislation**, including the Water Framework Directive and the polluter-pays principle. **Pollution prevention at the source is key**, with **nature-based solutions improving water quality and resilience** while supporting climate adaptation. Sustainable practices in agriculture and industry, as well as collaboration, are essential. Such actions will ensure the protection of both ecosystems and public health, while aligning with broader environmental and climate objectives.

Lastly, to ensure the success of the EWRS, a strong, coordinated approach with the European Union will be essential. **Actions should be guided by the subsidiarity principle, empowering Member States, national, local, and regional authorities** to address their specific water challenges