European Commission Call for Evidence: Targeted Revision of the Water Framework Directive (2000/60/EC)

Response by the European Federation of Geologists (EFG)

April 2026

The European Federation of Geologists (EFG) welcomes the opportunity to contribute to the European Commission's call for evidence on the targeted revision of the Water Framework Directive (WFD). As a professional organisation representing geoscientists across Europe, EFG does not advocate for specific industrial sectors but promotes excellence, integrity, and competence in the application of geoscience for the benefit of society.

1. The role of geoscience in achieving EU water policy objectives

Subsurface systems play a fundamental role in the functioning, protection, and sustainable use of Europe's water resources. Groundwater constitutes a critical component of the hydrological cycle and is essential for drinking water supply, ecosystem stability, and climate resilience. The implementation of the WFD therefore relies heavily on high-quality hydrogeological expertise.

EFG emphasises that achieving the Directive's objectives, particularly in the context of climate change, increasing water stress, and competing land uses, requires the systematic integration of qualified geoscientific expertise into assessment, monitoring, and decision-making processes.

2. Implementation challenges and the need for a balanced approach

EFG notes that certain aspects of the current implementation of the WFD may lead to unintended consequences:

- The interpretation of the "non-deterioration" principle is in some cases applied at the point of discharge rather than at the scale of the water body. This can result in discharge requirements exceeding natural background conditions, leading to disproportionate treatment efforts and additional environmental impacts.
- The application of Environmental Quality Standards (EQS), while an effective regulatory tool, may in some cases lack proportionality where compliance is required despite negligible or non-measurable environmental impact.

EFG therefore recommends that the revision of the WFD explicitly clarifies the scale of application of the non-deterioration principle at the level of the water body and promotes risk-based approaches to the application of EQS, taking into account natural background levels and site-specific hydrogeological conditions.

EFG stresses that maintaining a high level of protection for both groundwater and surface water must remain the cornerstone of EU water policy. However, the revision of the WFD provides an opportunity to improve clarity and proportionality in its implementation.

In this context, EFG highlights the importance of enabling Member States to take informed, science-based decisions that balance environmental protection with broader societal needs, including the secure and sustainable supply of critical raw materials, as recognised in the EU's strategic initiatives such as RESourceEU.

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3. Strengthening professional competence in water management

EFG underlines that robust, science-based implementation of the WFD depends on the involvement of qualified and ethically accountable professionals. To this end, the revision process should be accompanied by measures that:

- **Ensure certified expertise in hydrogeological assessments:** The involvement of certified professionals, such as holders of the European Geologist (EurGeol) title, should be systematically required in groundwater impact assessments, permitting procedures, and risk evaluations. This ensures that decisions are based on validated competence and adhere to high ethical and professional standards.
- **Promote harmonised professional standards across Europe:** Include the Geologist profession under Directive 2005/36/EC to enhance the mobility of geologists and facilitate the rapid deployment of expertise where water-related challenges arise. Recognising EurGeol as part of a European Professional Card framework would further streamline cross-border professional practice.
- **Invest in education and continuous professional development (CPD):** Addressing current and future water challenges requires sustained investment in geological education and lifelong learning, particularly in hydrogeology, water resource management, and climate adaptation. EU-supported programmes and partnerships between academia and industry are essential to maintain a highly skilled workforce.

4. Enhancing governance and trust through professional standards

EFG emphasises that the credibility and effectiveness of water policy implementation are closely linked to public trust. This can be strengthened by:

- Embedding high ethical, environmental, and professional standards in all water-related activities;
- Ensuring that assessments underpinning regulatory decisions are conducted by competent and accountable professionals;
- Promoting transparency and consistency in methodologies used across Member States.

5. Integrating water policy with broader EU strategic objectives

The targeted revision of the WFD should be coherent with broader EU priorities, including resource security, climate resilience, and environmental sustainability. Subsurface expertise is essential to support these objectives, particularly where water management intersects with energy, land use, and raw materials policies.

EFG highlights that geoscientists play a central role in bridging these domains by providing integrated assessments of subsurface systems, risks, and resources. Their expertise is critical to ensuring that policy objectives are implemented effectively and responsibly.

6. Conclusions

EFG supports a targeted revision of the WFD that:

- Maintains a high level of environmental protection;
- Improves clarity, proportionality, and consistency in implementation;
- Strengthens the role of qualified geoscientific expertise in decision-making;
- Supports the development of a skilled and mobile geological workforce across Europe.

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By reinforcing the role of professional geoscientists, the European Union can ensure that its water policy remains scientifically robust, operationally effective, and fit for current and future challenges.

EFG stands ready to support the European Commission in the technical refinement of the Water Framework Directive.

About EFG:

The European Federation of Geologists (EFG) is the largest and most influential network of geoscience professionals across the Council of Europe countries, with 27 national associations representing a direct membership of approximately 50,000 individuals. EFG collaborates extensively with leading geoscience organisations worldwide, including in Australia, the USA, Canada and South Africa, indirectly reaching over 150,000 experts.

About the EFG Panel of Experts on Hydrogeology:

The EFG Panel of Experts on Hydrogeology promotes the sustainable management and protection of groundwater resources, essential for drinking water supply and environmental balance. It fosters knowledge sharing, policy advocacy, and professional development while emphasising geoethics and the FAIR principle to ensure groundwater remains a visible and well-managed resource.

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