



EEB

European
Environmental
Bureau

Pollution prevention as a pre-requisite for circular water management

ZeroPM workshop, 8 October 2025



Who are we?

The EEB is **Europe's largest network of environmental citizens' organisations** – and the only one to work on such a broad range of issues.

Our over **190 members** from **41 countries** have more than 30 million individual supporters.

We have **50 years of EU environmental policy expertise**.

Our work areas



Climate



Circular Economy



Nature



Economic Transition



European Institutions and Governance



Global and Regional Policies



Health and Environment



Environmental Law and Justice



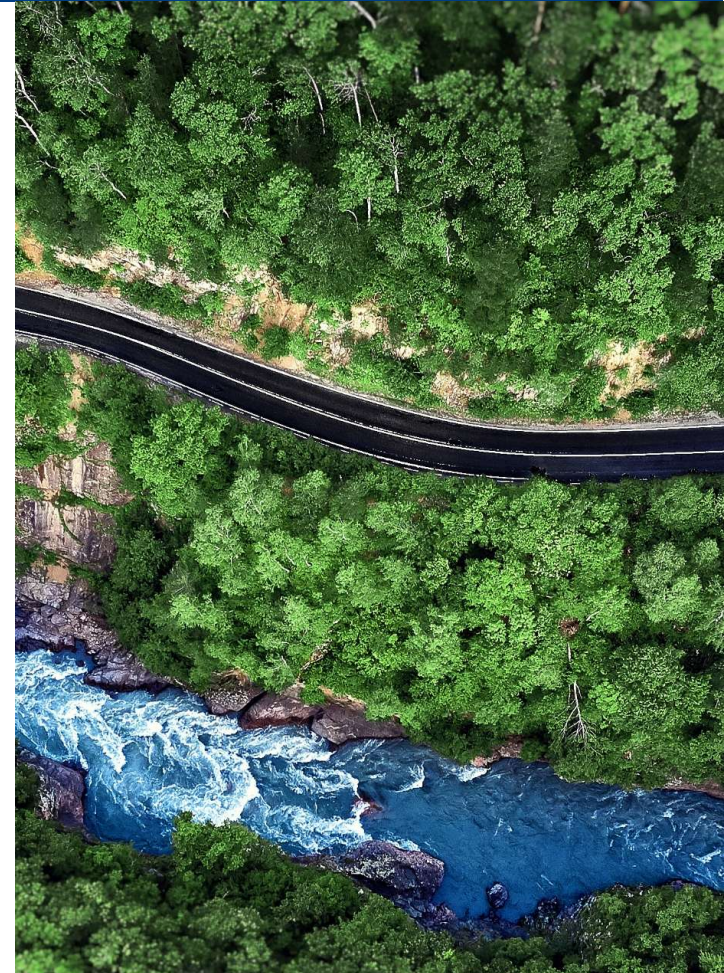
EU water quality: state of play

In the year 2000 EU Member States adopted the Water Framework Directive and agreed to bring Europe's waters to 'good status' by 2015.

A quarter of a century later, they're far from delivering on their legal obligations:

- 29% of surface water bodies in good chemical status
- 77% groundwater bodies in good chemical status

References: EEA Report No 7/2024 Europe's state of water 2024





What is chemical status ?

Chemical status under the WFD is assessed against a small and outdated list of pollutants and their associated quality standards, largely overlooks the effects of chemical cocktails.

On 23 September, the EU institutions agreed on an **update of the lists of priority water pollutants**, adding more pesticides, a group of PFAS, and – for the first time – pharmaceuticals.

Timeline

- 2026 – expected formal adoption
- 2027 – monitoring program
- 2030 – preliminary programme of measures
- 2033 – final program of measures
- 2039 – compliance with new EQS
- 2045 – possibility to delay compliance to this date

Surface water (last updated in 2013)

Annex X WFD, Annex I EQSD

- 45 priority substances

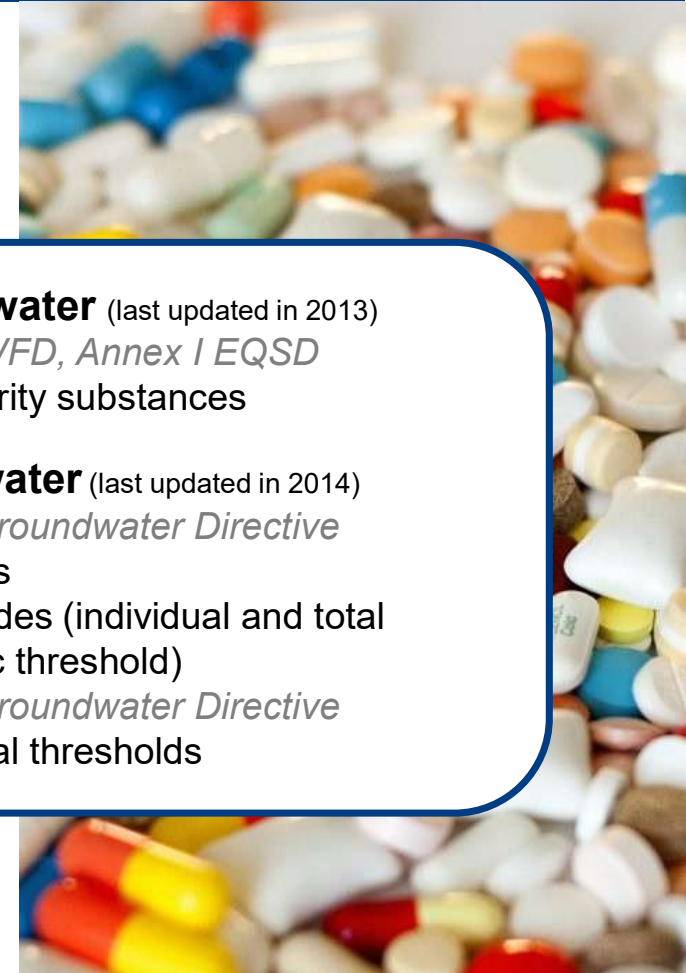
Groundwater (last updated in 2014)

Annex 1 Groundwater Directive

- Nitrates
- Pesticides (individual and total generic threshold)

Annex II Groundwater Directive

- National thresholds





Consequences

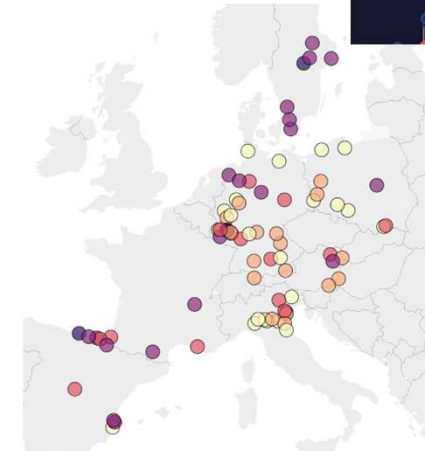
Assessment of reported PFOS biota monitoring data from seven EU Member States, comparison to current and proposed new EQS

- **Current PFOS EQS** (9,1 µg/kg ww): Exceeded in 20-40% of cases in Sweden, Austria, France, Spain, and Germany;
- **Soon to be adopted new PFAS EQS** (77 ng/kg ww, PFOA equivalents): More than 15% of samples in Sweden, France, Austria and Spain exceeded the proposed new EQS by 500 times or more.

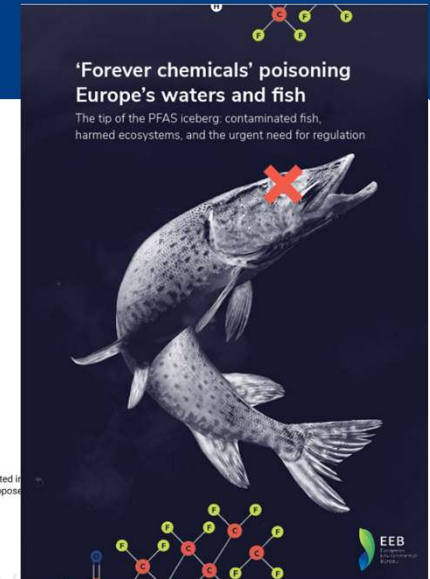
Results are conservative as only one PFAS assessed.

Hotspots of PFAS in fish

Hotspots represent the highest 5% of PFOS contamination values detected in reporting nation. Values are expressed as exceedance relative to the proposed data cover the sampling period from 2013 to 2023.



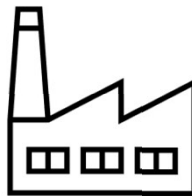
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REACH, CLP



Industrial Emissions Directive



UWWTP

Foodstuff regulation

Water Reuse Regulation



Sludge Directive

Urban Wastewater Treatment Directive

Drinking Water Directive



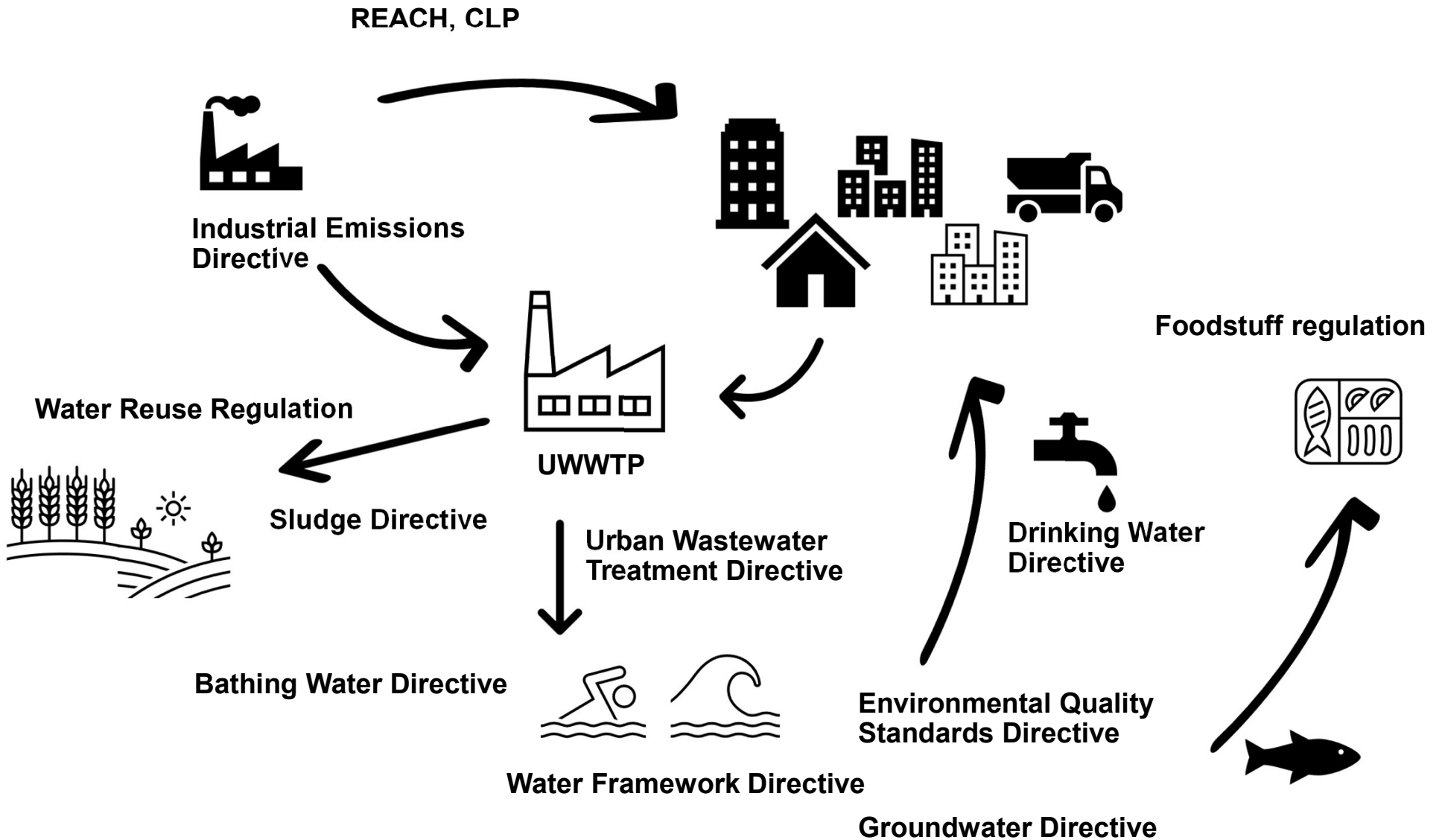
Bathing Water Directive



Environmental Quality Standards Directive

Water Framework Directive

Groundwater Directive





Regulatory action

Recast Drinking Water Directive (adopted 2020)

- Limits for 'total PFAS and 'sum of 20 PFAS'

Revised Industrial Emissions Directive (adopted 2024)

- Tightened provisions on industrial discharges to sewers
- Requirements to protect soil and groundwater extended to also include surface water and drinking water catchments

Recast Urban Wastewater Treatment Directive (adopted 2024)

- Micropollutant removal at selected UWWTPs by 2045 (with interim deadlines)
- Producers and importers to cover 80% of micropollutant removal costs

Amended WFD, Groundwater Directive, Environmental Quality Standards Directive (soon to be adopted)

- Surface water: 4.4 ng/L for sum of 25 PFAS, expressed as PFOA equivalents
- Groundwater: DWD 'sum of PFAS' = 100 ng/L for 20 PFAS

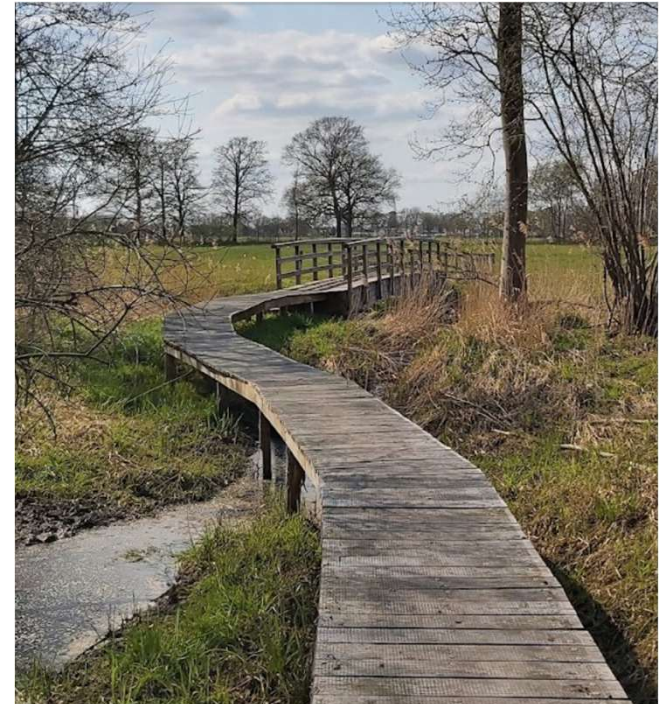


Reality check

Authorities continue to grant lax permits. One recent example:

- The Province of Limburg (NL) has granted the industrial wastewater treatment company CFS in Weert a permit to discharge 5 kg PFAS/year to the sewer system
- The UWWTP cannot remove it -> discharged to the Meuse river
- The Meuse supplies around 7 million people in Belgium and the Netherlands with drinking water
- Permit contested by drinking water suppliers and civil society

EEB members regularly challenge permits in court





New threat: deregulation

New simplification agenda of the Commission

Environmental protections risks being wiped out without impact assessment via multiple so-called omnibuses

The environmental omnibus is expected before the end of the year, consultation for food & feed omnibus ongoing

Almost 200,000 people responded to env omnibus consultation, urging the European Commission to prevent any rollback of EU environmental laws under the guise of 'simplification'.

Several industry actors lobby to see WFD included and weaken its scientifically backed objectives.





Watershed moment

European Environmental Agency: *“climate change and environmental degradation pose a direct threat to Europe’s competitiveness, which depends on natural resources”*.

Healthy freshwater ecosystems carry an estimated economic value of over €11 trillion in Europe

Need to rethink the links between our economy and the natural environment, land, water and natural resources and make the right priorities.

References: EEA report 11/2025 Europe’s environment and climate, WWF, 2023)



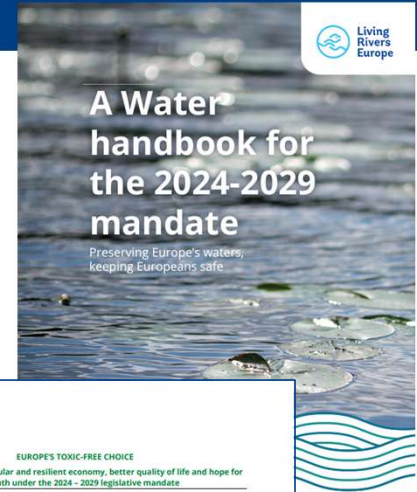
Way forward

Maintain strong environmental standards, including the Water Framework Directive

Step up implementation and enforcement to ensure that national authorities grant permits in line with water protection goals

Ensure that chemical policies accelerate the identification and phase-out of harmful chemicals

Implement and expand economic instruments under WFD, UWWTD to ensure fair contribution from polluting sectors



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EUROPE'S TOXIC-FREE CHOICE
Actions for a more circular and resilient economy, better quality of life and hope for our youth under the 2024 - 2029 legislative mandate

The European Union stands at a pivotal moment to shape a future where prosperity, public health, social justice, and a resource-preserving as well as climate-friendly economy coexist.

Despite advancements in health, climate and environmental policies, the pervasive threat of pollution from hazardous chemicals presents a stark challenge threatening our [health](#) and the earth's stability. Found in our water, food, air, and everyday products, these inescapable chemicals compromise our health, causing illness like cancer, infertility, cognitive impairment, and premature death, with disproportionate impacts on vulnerable persons including women and children, and future generations. Europeans are already [highly exposed](#). Chemical pollution is a profound health crisis infringing on the fundamental human right to a clean, healthy and sustainable environment.

As we look towards the 2024-2029 mandate, the EU must commit to a toxic-free and socially just green transition and support the European industry in leading the way in the innovation of clean and non-toxic chemicals, products, and practices. We owe it to future generations to champion solutions for the climate, the biodiversity, and the chemical pollution crises.

To attain these objectives, the first unavoidable step is for the European Commission to fully deliver on the Chemicals Strategy for Sustainability and maintain a high level of ambition in its implementation.

The EU must implement a 'One Planet, One Health' holistic approach that prioritises access to clean substance, promotes agroecology, and transitions away from highly hazardous pesticides. This approach will complement efforts to reduce carbon emissions and strategies to eliminate toxic chemicals in consumer products by 2030.

Policymakers must prioritise the following critical areas:

1. Update REACH to accelerate the identification and phase-out of harmful chemicals

REACH, the existing chemicals control system, must be reformed. On average it takes over [10 years](#) to [classify](#) a harmful chemical, while many other chemicals continue to be placed on the market despite unknown properties, including the building blocks for plastics, known as polymers. The system lags behind scientific consensus, with central information requirements missing and most harmful chemicals like PFAS, bisphenols, halogenated flame retardants, and PVC remaining on the market. **A swift reform of the current system is necessary to effectively protect citizens and the environment. Only chemicals for which complete and adequate safety data are provided should be placed on the market and the restriction of the most harmful chemicals by groups, such as carcinogens, reproductive, persistent chemicals and endocrine disruptors, must be accelerated.**

To achieve this, updates of REACH are needed to:

- Introduce fast track restrictions for the [most harmful chemicals](#) in all professional products
- Simplify and reduce the burden of Restriction and Authorisation processes for authorities;
- Improve registration requirements, including for polymers, endocrine disruptors, persistent, bioaccumulative and mobile chemicals and carcinogens.

2. Deal with the ever-growing PFAS pollution to sustain our quality of life: food security, water and nature

The [European Pollution Index](#) recently revealed EU-wide PFAS contamination of drinking water, food and soil. At the same time, the human Biomonitoring Initiative [found](#) "widespread exposure to PFAS which exceeds health-based guidance values" among the European population. The European Environment Agency recognises that these substances - ubiquitous in consumer products - "can lead to health problems such as




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Thanks for listening!

Keep in touch

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The EEB gratefully acknowledges the financial support from the LIFE Programme of the European Union. This communication reflects the organizers' views and does not commit the donors.