



German Advisory Council  
on the Environment

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[https://www.umweltrat.de/SharedDocs/Downloads/DE/04\\_Stellungnahmen/2016\\_2020/2018\\_12\\_Brief\\_Wasserrahmenrichtlinie.html](https://www.umweltrat.de/SharedDocs/Downloads/DE/04_Stellungnahmen/2016_2020/2018_12_Brief_Wasserrahmenrichtlinie.html)

**Consultation in the context of the fitness check of the Water Framework Directive**

Dear Commissioner Vella,

we highly appreciate the possibility to participate in the public consultation that will inform the fitness check of the EU Water Framework Directive.

The German Advisory Council on the Environment (SRU) has published a number of recommendations on water protection issues, also in respect of the implementation of the Water Framework Directive (WFD). The WFD has contributed to a great extent to strengthen water protection in Europe and to better integrate activities in this respect. The directive is the central instrument to protect freshwater bodies, coastal waters and groundwater bodies, and to improve their ecological, chemical and quantitative status. It stipulates cross-border cooperation in water protection.

The implementation of the WFD is, nevertheless, a major challenge for the member states. A variety of measures have been taken to improve the quality of water bodies in Germany. These measures have not always shown short-term positive effects because some time is necessary for a good ecological status to be achieved. In order to reach a good status for our surface waters and groundwater bodies as required by the directive, the efforts in water protection should be unabatedly continued.

For this to succeed, we think it is crucial to strengthen the implementation process instead of amending the WFD. European initiatives can make an important contribution to this. In particular, it is necessary to draw attention to the upcoming reform of the Common Agricultural Policy (CAP), which should be used for a better financing of

measures to be taken against agricultural pollutions. A further renationalization of agricultural policies, which is under discussion at present, might weaken environmental and water protection issues.

In respect of the considerable efforts which are needed for better water protection, we see the necessity to continue the implementation of the WFD beyond 2027. What this should look like in detail needs to be clarified in the near future. Under no circumstances should the objectives of the WFD be watered down. Otherwise existing efforts and targets would be devaluated. It also entails the risk that measures for water protection and the implementation of European targets in general would be put into question. At the same time uncertainties in the planning of economic activities affecting water protection issues could increase which is also not welcomed. For the above-mentioned reasons, we see less need for fundamental changes to the WFD but we recommend activities to strengthen the implementation process.

Yours sincerely,

Claudia Hornberg