

14<sup>th</sup> April 2026

## **Response to Call for Evidence on the targeted revision of the Water Framework Directive**

The proposed “simplification” of the Water Framework Directive (WFD) risks weakening one of the EU’s most scientifically grounded environmental safeguards at a time when water quality is under sustained pressure. Evidence from Ireland shows the core challenge is not regulatory complexity but persistent implementation deficits in agriculture, extractive industries, and wastewater infrastructure. Revising the Directive now would exacerbate these issues.

The EU Water Resilience Strategy emphasises that resilience depends on effective implementation of legislation and prevention of pollution at source. Weakening WFD provisions, including the non-deterioration principle, monitoring obligations, or permitting controls, as is proposed, would directly contradict these objectives.

In Ireland, agriculture is the dominant pressure, with elevated nitrogen reported at ~42% of river sites and phosphorus exceeding thresholds in over a quarter of rivers (EPA 2023; 2024). Intensively farmed catchments such as the River Nore, River Barrow, River Suir, Blackwater River (Munster), and Maigne River have high densities of Nitrates Derogation farms (up to 250 kg N/ha). With the derogation, several of these catchments are already exceeding nitrates thresholds, prompting mandatory reductions to 220 kg N/ha in sensitive areas. This demonstrates that relaxing regulatory requirements directly correlates to increased nutrient pressure which is particularly evident in sensitive water systems.

Ireland has experienced a decline in high-status water quality since the 1990s, with high-status rivers dropping from 27% (1987-1990) to roughly 15-16% in 2023 (EPA, 2023). Water quality decline has direct public health and associated treatment cost implications. Chemical contamination presents a chronic risk. Elevated nitrates in groundwater, driven by agricultural surplus is associated with methemoglobinemia or “blue baby syndrome” and increased colorectal cancer risk via nitrosamine formation (WHO 2017; Ward et al., 2018; Schullehner et al., 2018). Several exposure-assessment studies (Appendix) confirm statistically significant associations between nitrates in drinking water, cancer and other

adverse health outcomes. Ireland has the highest incidence of *Verotoxigenic Escherichia coli* in Europe (~19.2 per 100,000), a tenfold increase since the 1990s (HPSC, 2023; EPA, 2024). Private water supplies, serving ~20% of the population, are a key pathway for contamination. Up to 10% of cases develop haemolytic uraemic syndrome, a chronic and serious condition (HPSC, 2023). These examples underscore the need for stringent monitoring and implementation requirements in regulation.

Legacy pollution further highlights long-term consequences. The Avoca River remains contaminated decades after mining activities were ceased, with persistent metal pollution and incomplete restoration (DECC Monitoring report, 2024). This further underscores the need to retain and enforce regulatory safeguards. Wastewater deficits also compound pressures with over half of treatment plants failing to consistently meet standards, and combined sewer overflows in Dublin and Cork discharge untreated effluent during storm events (EPA 2023), contributing to microbial contamination and nutrient loading.

These examples show persistent exceedances, decline in high-status waters, and measurable health risks. Once degradation occurs, restoration is costly, slow, and often incomplete. Simplifying the WFD, through exemptions, reduced monitoring, or relaxed permitting would therefore be counterproductive – potentially benefiting high-pressure sectors while externalising costs through healthcare burden, treatment costs, and ecosystem loss.

The evidence is clear: achieving high water quality requires stronger implementation, not dilution, of the WFD. Its provisions remain scientifically sound and essential to EU objectives. The Commission should prioritise enforcement, monitoring, and targeted investment, rather than legislative revision. Simplification in this context is not efficiency; it is a risk!

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