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Position Paper: Targeted revision of the Water Framework Directive (WFD)

Business & Science Poland

This position paper is submitted on behalf of Business & Science Poland (BSP) in response to the European Commission's Call for Evidence on the "EU water policy – targeted revision of the Water Framework Directive".

BSP Position

Business & Science Poland (BSP) highlights the strategic importance of **ensuring a stable and balanced regulatory framework for sectors contributing to the European Union's security of supply of critical and strategic raw materials, as well as strategic autonomy and risk preparedness.**

Among these sectors, the mining and metallurgical industry – **exemplified by companies such as KGHM Polska Miedź S.A.**, one of the world's leading producers of copper – plays a fundamental role in the European value chain. **Copper, identified by the European Union as a critical raw material, is indispensable for the energy transition**, including renewable energy deployment, electromobility, smart grids, and low-emission technologies. Furthermore, metals produced in the EU are of key importance for the defence and security sectors, supporting the production of advanced technologies and infrastructure.

In light of ongoing initiatives aimed at simplifying environmental legislation and strengthening the EU's capacity to secure access to critical raw materials, **Business & Science Poland sees a clear need to revisit the provisions of the Water Framework Directive (WFD).** The revision should **aim to strike a balanced approach between the protection of water resources and the need to enable sustainable economic development**, including the implementation of strategic industrial and energy projects.

Key recommendations

The mentioned-above objectives, can be achieved by:

1. Safeguarding water resources while securing the supply of critical raw materials
2. Ensuring proportionate and well-targeted regulation
3. Strengthening regulatory stability and coherence

Detailed recommendations

Below you can find a detailed position of BSP on the revision of the Water Framework Directive.

1. Safeguarding water resources while securing the supply of critical raw materials

The current water management framework constitutes a cornerstone of EU environmental policy. However, **practical experience indicates that there is room for improvement** in order to better reflect evolving economic, technological, and geopolitical realities.

In particular, **the increasing importance of raw material security and the acceleration of the energy transition call for a coherent and forward-looking legislative framework** that facilitates investments, including those related to the extraction and processing of critical and strategic raw materials.

Future regulatory developments should reflect the need to balance multiple public interests. This requires a system that:

- ensures a high level of protection of water resources,
- enables economic activity to be conducted in a stable and predictable regulatory environment,
- supports the delivery of key European Union policy objectives.

2. Ensuring proportionate and well-targeted regulation

Regulatory mechanisms should fully respect the principles of proportionality and appropriateness, ensuring that measures are aligned with the actual environmental impact of activities.

In this context, Business & Science Poland encourages consideration of policy directions that would:

- allow for a more differentiated and flexible approach to water quality assessment,
- better reflect local, geological, and technical conditions,
- streamline administrative procedures related to strategic investments, particularly in the raw materials sector,
- enhance the consistency and predictability of existing regulatory instruments.

3. Strengthening regulatory stability and coherence

Regulatory stability and predictability are essential for long-term investment planning. Therefore, efforts should be made to ensure that the regulatory framework:

- reduces legal uncertainty and interpretative risks,
- improves transparency of decision-making processes,
- enables long-term strategic planning for industrial operators.

Finally, **strengthening coherence across EU legislation should remain a key priority.** Environmental policies should be better aligned with initiatives related to:

- raw material security,
- the energy transition,
- enhancing the resilience and competitiveness of the European economy.

The above considerations do not aim to weaken environmental protection standards, but rather to ensure their effective implementation in a way that is adapted to current challenges. A balanced and coherent regulatory approach can reinforce both environmental protection and the EU's capacity to achieve its strategic objectives.

About BSP

Business & Science Poland (BSP) is the largest Brussels-based association representing Polish companies from various sectors in discussions with EU institutions. It bridges the experience of leading Polish enterprises with the EU agenda. BSP represents the expertise and interests of Polish companies employing over 280,000 people in Poland, across the EU, and globally. The main objective of BSP is to strengthen the representation of Polish economic interests and ensure that EU legislation takes into account the specific circumstances and needs of the Polish economy.

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