



Call for Evidence on targeted revision of Water Framework Directive

Deadline: 14 April 2026

Submission from: AQUA! Water Heritage – Patrimoines de l'Eau

AQUA! Water Heritage¹ (AQUA!) is an association that brings together citizens, experts and local authorities to work towards water management that respects all its dimensions. Rivers, ponds, lakes, wetlands, canals and other European water bodies are the result of the reciprocal influences of both nature and society, in a history that has lasted for several millennia. Environmental water is thus a physical and cultural, social and economic, material and symbolic phenomenon: all these dimensions are intertwined. This complex, hybrid reality of water heritage, its new ecosystems and its multiple uses has been highlighted by scientific research, especially within the **Water-Energy-Food-Ecosystem Nexus**.

Our approach aims to place this open and complex vision of water at the heart of European public debates, to build a common and sustainable future. Unfortunately, meaningful dialogue today is hampered by two predominantly opposite approaches: a naturalist approach, which sees water as a theoretical ideal of nature without human impact, and an economist approach, which sees water as an exploitable resource without life or history. **Water management is not just about ecology and natural sciences.** Social, economic and heritage interests must be considered to avoid biased decisions.

Specifically, AQUA! is concerned with the treatment of **hydraulic structures such as water mills within the WFD**. Hydraulic structures do not necessarily pollute or eliminate aquatic and wetland environments; they also create new environments and host biodiversity, sometimes greater than that of the previous environment. **Hydroclimatic change** accentuates the role of refuge and resource that these structures can play, including for surrounding terrestrial biodiversity. Furthermore, at the local level, the restoration of water mills has the potential to deliver energy in the form of **electricity, district heating and hot water**, all of them being important contributions to energy security.

The reopening of the WFD is intended to ensure continuation of policy actions that contribute to water resilience as outlined in the **Water Resilience Strategy**, while supporting the EU's strategic autonomy in relation to critical raw materials (CRMs).

AQUA! notes that the objectives of this reopening have the effect of bringing natural and economic visions into direct conflict with each other. The WFD is built on a “non-deterioration principle” and ecosystem-based management. **Simplification for CRMs exploitation risks shifting toward project-based approvals which will not give enough consideration to the water footprint, ecosystem-based protection and local communities involvement.**

¹ <https://aqua-asso.eu/en/home/>

The same regulatory changes aimed at enabling Critical Raw Materials (CRMs) could indirectly reshape how small hydropower (like restored water mills) is treated under the WFD. **If WFD rules are relaxed for “strategic projects,” large CRM sites may be favoured over small, low-impact renewables.**

Therefore, we believe that **the simplification of the WFD to support Critical Raw Materials should be technology-neutral and impact-based, ensuring that low-impact, community-scale renewable energy projects – such as restored water mills – benefit equally from streamlined permitting and proportionate environmental requirements, particularly where they deliver net ecological and social gains.** Decentralised renewable energy projects, including the restoration of historic water mills, should be explicitly recognised as serving an overriding public interest, comparable to strategic raw material projects.

France provides strong evidence that existing hydraulic infrastructure and historic mills can deliver renewable energy with minimal additional pressure on water bodies, as shown² in the [Interreg Europe RENEWAT project](#), or the [Citizen Led Renovation Programme](#).

The Joint Research Centre recently [published a scientific paper](#) on “policy, science and industry synergies to **unlock hidden small hydropower in the European Union** under the water-energy-society-ecosystem nexus”. The paper³ concludes that there is an untapped EU potential for such ‘hidden hydro’ of up to 15 TWh/year, including water mill restorations, which often face:

- Strict application of non-deterioration rules
- Requirements to remove weirs or restore full river continuity
- Complex permitting and loss of historic “water rights”

At the same time, CRM projects are enabled through strategic prioritisation and accelerated permitting under the Critical Raw Materials Act. This highlights a **policy inconsistency whereby high-impact extractive projects are facilitated while lower-impact renewable energy projects, reusing existing structures, are constrained.**

An **environmental comparison** of CRM projects with water mill restorations notes the high risk of chemical pollution, large scale hydromorphology alterations, low reversibility, centralized scale and limited local co-benefits for CRM projects whereas restored water mills exhibit minimal chemical water pollution, localized/pre-existing hydromorphology changes, high reversibility, distributed scale and co-benefits of energy, heritage and local resilience. **The lower impact of restoration projects is in part due to the optimization of legacy infrastructure rather than the introduction of new pressures.**

² <https://www.interregeurope.eu/renewat> and https://citizen-led-renovation.ec.europa.eu/document/download/2a24a154-3ca2-4cd2-a151-fd4d77edcffe_en?filename=CLR%20Phase%20II%20Inspiring%20cases_Water%20mills.pdf&refLang=fr

³ <https://www.sciencedirect.com/science/article/pii/S2211467X26001409?via%3Dihub>
<https://publications.jrc.ec.europa.eu/repository/handle/JRC143121>

If not balanced, the risks of WFD simplification may undermine ecological and energy objectives due to the reduced flows and water quality impacts of CRM projects which may also negatively impact the viability of hydropower projects and the normalization of deterioration through greater use of exemptions (Article 4(7)), while a continued strict interpretation for hydropower may block restoration of existing water mills.

Thus, **our policy recommendations** to ensure coherence and fairness can be summarized as follows:

- **Recognise small hydropower as being in the ‘overriding public interest’**, explicitly stating their contribution to renewable energy targets, energy security and rural development
- **Introduce proportional permitting with fast-track approvals for micro/small hydropower (<1 MW)** especially on existing structures and reduce administrative burden relative to environmental risk
- **Apply a ‘net ecological benefit’ test** that allows projects where fish passage, sediment continuity and habitat improvements are included and the overall ecological condition improves despite minor structural presence.
- **Ensure equal treatment with CRM projects** whereby any simplification or derogation framework applied to CRM projects should also apply to low-impact renewables.

In conclusion, while Critical Raw Materials are indispensable for enabling Europe’s future energy systems, small hydropower already provides immediate, decentralised renewable energy, often by reusing existing hydraulic infrastructure.

In this context, any revision of the Water Framework Directive aimed at facilitating strategic projects should be designed in a technology-neutral and impact-based manner, ensuring that measures to streamline permitting, clarify the application of exemptions, or reduce administrative burden are applied consistently and proportionately across sectors. This would allow both CRM-related developments and low-impact, small-scale renewable initiatives to contribute effectively to Europe’s energy security and climate objectives, while fully respecting the Directive’s core environmental principles.