

February 21<sup>st</sup>, 2025



## The Government of Denmark pushing implementation deadlines of the Water Framework Directive to 2033 or later

Dear Florika Fink-Hooijer, dear Directorate-General for the Environment

CC: Patrick Child, Veronica Manfredi, Claudia Olazabal, Michel Sponar

We are writing to you because the Government of Denmark is planning to exceed the implementation deadline of the Water Framework Directive by at least six years for lakes, rivers, and groundwater. The directive clearly states that only 'natural conditions' can be a valid reason for derogating from the obligation to achieve good ecological and chemical status by 2027. This means that all necessary measures to achieve good status in all water bodies must be fully implemented by 2027. This was recently re-iterated by the Danish Ministry of Environment as part of a review of nitrogen modelling carried out by international experts and Danish authorities<sup>1</sup>. This review included a legal assessment of obligations under the Water Framework Directive.

Despite the clear wording of the directive and the recent re-iteration of obligations, the Minister for Green Transition, Jeppe Bruus, sent a letter to a selection of political parties on December 19<sup>th</sup>, 2024, stating that for lakes, rivers and groundwater, *"All possible and necessary measures will be initiated now, but the measures will be fully implemented only in 2033 and after, as there is not sufficient capacity to carry out all land-use based initiatives before 2027"* (own translation – see attached letter for original version). Hence, the Minister concludes that all necessary measures to achieve good status will be implemented at the earliest in 2033, eight years from now and six years after the implementation deadline. We believe that this constitutes a clear infringement case of the Water Framework Directive.

The condition of Danish lakes, rivers and groundwater is terrible. Of the 985 lakes included in the Danish River Basin Management Plans (RBMPs), zero are currently in both good ecological and chemical status<sup>2</sup>. Out of the 18.600 kilometers of rivers and water streams included in the RBMPs, only 500 kilometers which constitutes only 3%, are in good status, when also including environmentally harmful substances in the assessment<sup>3</sup>. 43% of our groundwater bodies are not in good chemical status<sup>4</sup>. In other words, the situation is severe for the freshwater bodies in Denmark. Despite the grim realities, the Danish government has postponed implementation of necessary measures to bring lakes, rivers and groundwater into good status.

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<sup>1</sup> Ministry of Finance, Sept. 2024: <https://www.ft.dk/samling/20231/almindel/mof/bilag/672/2909893.pdf>

<sup>2</sup> Ministry of Green Transition, December 2024: <https://mgtp.dk/media/fajyft4/faktaark-vp3-soeer.pdf>

<sup>3</sup> Ministry of Green Transition, December 2024: <https://mgtp.dk/media/gpib0i00/faktaark-vp3-vandloeb.pdf>

<sup>4</sup> Ministry of Green Transition, December 2024: <https://mgtp.dk/media/pgknjily/faktaark-vp3-grundvand.pdf>

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We strongly urge you, the Commission, to engage in dialogue with the Danish Government in order to bring this deliberate infringement of the Water Framework Directive to an end. The government should not wait eight years before implementing necessary measures which could be implemented now to save our surface water and groundwater. It is 25 years ago that the Water Framework Directive entered into force, so all governments have had sufficient time to do what is needed. The Danish government must make sure, that all necessary measures are fully implemented by the 22nd of December, 2027, as required by the Water Framework Directive

We look forward to your reply. Please do not hesitate to reach out if you have any questions.

Best regards

Maria Reumert Gjerding, President of the Danish Society for Nature Conservation

Sune Scheller, Campaign Manager for Greenpeace Denmark

Torben Kaas, Chairman, The Danish Sportsfishing Association

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