

EPSU Utilities Standing Committee

WATER RESILIENCE STRATEGY

Adopted at the 79th EPSU Executive Committee, 26-27 November 2025

he European Federation of Public Service Unions (EPSU) welcomes the European Commission's communication on a Water Resilience Strategy. In particular, we welcome the recognition of the European Commission that the current model of water management is not sustainable, and the decision to put water resilience at the top of the political agenda. However, the strategy lacks any concrete measures, and the Commission's growing tendency to push for market solutions raises concerns.

As Jan Willem Goudriaan, EPSU General Secretary, commented: "The market has proven that it is not capable of running strategic sectors that are key for human life and the economy – and that is very much the case of water. The Commission needs to listen to the citizens who demanded a human rights based approach to water over a decade ago."

This position paper outlines EPSUs response to the European Commission's Water Resilience Strategy.

The right to water

The Water Resilience Strategy recognises that at the current pace, global water demand will surpass what is available by 40% in 2030. To tackle this, the strategy identifies three objectives: restoring and protecting the water cycle as basis for sustainable water supply; building a water-



smart economy; and securing clean and affordable water and sanitation for all at all times, and empowering citizens for water resilience. It is regrettable however that the right to water is not explicitly recognised as a main objective of the strategy. As the leader of the Right to Water European Citizen's Initiative, EPSU highlights the following:

- Whilst the Water Resilience Strategy recognises the human right to drinking water, it fails to include any concrete measures to protect water as a public good. The strategy suggests that access to safe drinking water and sanitation across the EU is secured through existing EU law, including the Drinking Water and Recast Urban Wastewater Treatment (Recast) Directives. This makes the European Commission's recent proposal for a 'environmental omnibus' law even more concerning. Whilst this omnibus is still under consultation, it opens the possibility of amending the 'Extended Producer Responsibility' (EPR) scheme, a key element of the Recast Directive, which is key to ensuring access to sanitation. Previous omnibus laws adopted by this European Commission have served only to deregulate, benefitting private companies over people and the planet. We call on the European Commission not to water down any provisions in the Recast Directive, but rather help member states to properly implement laws that ensure the right to water and sanitation.
- The strategy acknowledges that securing universal access to water requires a whole-of-society approach with cooperation between citizens, businesses, civil society and nature representative groups and committed administrations. EPSU stresses that groups protecting water as a public good must be given equal weight in all dialogues regarding water resilience and regrets that European Commissioners' Project Group on Water Resilience did not include Commissioner Minzatu Commissioner for Social Rights and Skills, Quality Jobs and Preparedness.
- The Water Resilience Strategy calls for water pricing policies based on actual use, environmental impact and capacity. It suggests that the Water Framework Directive can be used to incentivise sound national water pricing policies, based on a fairly shared cost recovery and the polluter pays principle. However, in times of increased water scarcity and competing interests for water usage, this is not enough. It is clear that the priority must be universal access to drinking water and sanitation. In order to achieve this across the EU in the face of ever-increasing water crises, public control and ownership of water resources, operators and infrastructures is essential.
- The strategy recognises that the Europe's clean industrial deal and digital transformation will consume large volumes of often ultra-pure water. It calls for consideration of water resilience in spatial planning, and proposes minimum standards for data centres in relation to energy efficiency and overall sustainability, including for water consumption. As the European Commission rolls out its AI strategy, we highlight that water consumption for cooling agent and generative AI must never come at the expense of universal access to drinking water and sanitation.

Quality jobs and skills

According to the Water Resilience Strategy, in 2022 alone, the water sector supported 1.6 million jobs across 81 500 enterprises, and within certain sectors, there is the potential to create an additional 9000 jobs per year. Building on this potential, the strategy recognises skills as one of the main areas for EU action. However, metrics and discussions on jobs in the water sector need to take into account more than just job creation and necessary skills. The focus must be on quality jobs. As the representative European trade union federation in the sector, EPSU stresses the following:

- The strategy recognises that both public authorities and the private sector are facing an ageing workforce
 and a skills gap, particularly in technical areas such as water treatment and management, as well as
 in relation to digital skills. However, the only initiatives proposed to tackle this are related to skills. We
 stress that skills gaps are not the same as staff shortages, and addressing skills must go hand in hand
 with improving working conditions to make the sector more attractive to new workers and to retain
 current workers.
- All of the proposed initiatives aimed at securing the necessary skills for the water sector and filling skills gaps, including a Water Smart Industrial Alliance, the European Water Academy and the possible launch

of a Large-Scale Skills partnership, must be developed and implemented with the full participation of the representative trade unions.

- We support the Commission's aims to create more synergies and connect industry, education and
 research by creating knowledge communities under the European Institute of Technology. However,
 increasing water scarcity is a hugely complex issue that necessitates holistic solutions. Knowledge and
 skills must be developed not only in technical fields but also in social sciences to ensure a public interest
 based approach.
- The use of public procurement to promote water resilience must also promote good working conditions in the water sector. Social conditionalities must be attached to all public funds so that money does not go to companies that do not respect collective bargaining and workers rights.

Privatisation

The Water Resilience Strategy acknowledges that funding will need to be significantly stepped up to ensure water resilience. However, the focus on market mechanisms and competitiveness raises concern. EPSU recalls the exclusion of water services, especially drinking water supply and management of water resources, from internal market rules and mechanisms. The exemptions for water and wastewater in the Concessions Directive, which were granted following the successful European citizens' initiative Right2Water, must be maintained in any future legislative proposals. In response to the Water Resilience Strategy, we highlight the following:

- The proposal for nature credits would further commodify biodiversity and water systems, turning responsibilities for preserving ecosystems and ensuring clean, safe water into tradable assets rather than obligations. Nature credits and offsetting schemes can create perverse incentives to continue harming ecosystems with the promise of "offsets" instead of preventing damage in the first place. Nature credits would fail to prevent exploitative practices such as land grabbing, displacement, inequitable value capture and may even compromise sovereignty and regulatory control of a fundamental common good. Instead of this market approach, EPSU calls for regulatory measures to enforce existing water protection laws, invest in public infrastructure and nature-based restoration, reduce harmful subsidies, and ensure democratic, accountable management of water and ecosystems.
- EPSU also warns against proposals that would see public authorities absorb financial risks on behalf of private investors through mechanisms such as public-private partnerships or so-called "de-risking" schemes. In practice, these approaches socialise the risks while privatising the gains. Prioritising competitiveness in this way is fundamentally at odds with the obligation to secure universal access to water as a human right, all the more urgent in a context of worsening water scarcity.
- Similarly, efforts to attract private investment under the guise of safeguarding key infrastructure risk undermining democratic control. We highlight that water infrastructure is critical infrastructure which needs secure funding and cannot be left to the markets. This is especially crucial in times of geopolitical and environmental instability, and links closely with Europe's preparedness strategy.

Public service and nature based solutions

As the Water Resilience Strategy acknowledges, a water-smart economy requires a better control of the resources, and calls for more emphasis on awareness and public involvement in water management. However, this does not go far enough. Water resources need to be protected as a commons and a shared resource, regulated for the good of people and nature. EPSU calls for the promotion of public service and nature based solutions, and highlights the following:

 Reducing water loss and protecting and restoring ecosystems should be at the heart of the water resilience efforts. The strategy rightly focusses on nature based solutions to reduce water loss and tightening controls on private systems that abstract water directly at the source. These solutions must be prioritised over costly technical solutions afterwards which require huge investments and lead to many conflicting goals.

- The Water Resilience Strategy recognises that urgent action is needed to tackle pollutants which pose a risk to our vital sources of drinking water and that cleanup should be based on the polluter pays principle. However, preventing pollution and rectifying the source of pollution should be prioritised over unsustainable technical end-of-pipe solutions, especially in water works. Where end-of-pipe solutions are unavoidable, the polluter pays principle, including the EPR scheme, must be strictly implemented. The EPR scheme ensures that the two most polluting sectors, the pharmaceutical and cosmetic industries, cover at least 80% of the costs of the 'quaternary treatment' needed to remove micropollutants. We are concerned by the proposed 'environmental omnibus' which reopens discussions on company obligations under the EPR scheme.
- The strategy calls for local solutions to protect citizens and allow them to be prepared for what cannot be prevented, in line with the European Preparedness Union Strategy. It further highlights the need to improve the capacity to carry out water resilience investments, specifically in less developed regions. The best way to ensure this is through publicly owned water operators that are committed to the common good rather than profit maximization operators and well funded, quality public services.
- The resilience of public services depends on the interdependence between water, waste and energy networks. Public policies must recognise and plan for this complementarity through integrated investment, maintenance, and training strategies. Ensuring the continuity of these vital services requires close coordination between operators, public authorities, and unions. We call for a coordinated public policy that takes this interaction into account and recognises that water, sanitation and energy security are inseparable and together form the basis of social, environmental, and climate justice in Europe.





