

## Water Resilience

### Background

The European Water Resilience Strategy was published 4<sup>th</sup> June 2025. The goal is to set a path towards water security and resilience, while better integrating water considerations across different policies and sources of funding. The strategy also aims to scale up investments, leverage research and innovation and close the skills gap.

### CIFF views

The Finnish Chemical Industry Federation welcomes the Water Resilience Strategy and its recognition of water as a critical element of European resilience. The focus on restoring the water cycle, promoting a water-smart economy, and ensuring clean and affordable water aligns with our sector's long-standing commitment to sustainable water management and innovation. We stand ready to contribute to an efficient implementation of the strategy.

### Legal and operational clarity and policy coherence

CIFF supports the Water Resilience Strategy's emphasis on improving implementation over introducing new legislation. However, the complexity of already existing EU water-related legislation still calls for a comprehensive review to eliminate overlaps and contradictions. This is especially important as the Water Framework Directive's deadline of good status for all water bodies is fast approaching. Clear and coherent regulation is essential to foster innovation and long-term investment security in water resilience. Care therefore needs to be taken to ensure that EU policy works coherently across the board, and that progress already being made by industry is recognized. Our member companies are developing solutions to guarantee clean water and improve water efficiency both within and outside their own processes. At the same time, companies are continuously working to minimize environmentally harmful emissions to water and to ensure that emissions remain within the limits set by environmental permits and legislation. For example, the Industrial Emissions Directive, which is directly linked to permitting, introduces policy targets for chemical industry plants, including the continuous improvement of environmental efficiency and safety. New policy developments linking to water policy are ongoing not just in case of industrial emissions but in products, chemicals, the circular economy and biodiversity as well. There is a myriad of legislation that our companies need to navigate, and where the Water Resilience Strategy now can offer an opportunity for simplification and clarity. The European Commission or the JRC would be well-suited to carry out a mapping in this regard. Beyond ensuring coherence with existing policies, there is a need for an overarching view of how various EU policies, frameworks, initiatives and programs are interconnected and aimed at achieving water resilience. Clearly positioning the Water Resilience Strategy within this broader picture is essential for providing clear guidance to all stakeholders.

Robust, relevant and up-to-date data, science-based risk assessments, comprehensive impact assessments and technology neutrality are crucial for avoiding unintended consequences and reaching water resilience and efficiency in practice.

### Focus on locally adapted implementation and impactful solutions

Implementation of the Water Resilience Strategy must reflect local water conditions, challenges and opportunities. Action should be prioritized and targeted where it yields the greatest benefit, with all sectors and users contributing. CIFF supports the Water Resilience Strategy's attention to concrete measures such as leakage reduction, infrastructure renewal, and digital water technologies. As climate change and biodiversity loss are intensifying water-related risks,

investments in flood protection, drought management, and preparedness are also crucial to safeguarding societies at large: people, ecosystems, and industrial competitiveness.

Infrastructure upgrades overall - in abstraction, distribution, consumption, purification, reuse and recycling - are a cornerstone of the “water efficiency first” principle. This principle, together with the proposed water hierarchy, should be driven with the aim of tangible rather than theoretical efficiency gains in mind. The 10% efficiency target by 2030 and the methodology accompanying it must be based on reliable data and be developed transparently in cooperation with stakeholders to ensure that efficiency improvements are realistic, context-specific, and aligned with local realities. It is also important to clarify the baseline assumptions and grounds for calculating the target. Implementation and governance must allow for tailored prioritization and cost-efficient solutions.

### **Recognize industry progress and maintain a technology-neutral stance**

The chemical industry’s long-standing sustainability program, Responsible Care, is based on continuous improvement, sharing of best practices, and annual reporting. The participating companies report on multiple indicators that track not just the progress of the program, but also the sustainability measures of the companies themselves.

Over the past 30 years, Finnish companies committed to Responsible Care have seen a 54% reduction in water consumption. In 2024, the companies committed to Responsible Care consumed 1.09 litres surface or ground water per one kg of production. Water consumption in production has significantly improved.

In the companies committed to the Responsible Care program, cooling water represents about 98 % of total water use. Approximately 85 % of cooling water is originated from the sea, rest is from other surface water sources. Industry uses cooling water because of its good availability and high heat transfer capacity. In Finland, the water used for cooling plants is subject to permits and is monitored. The cooling water is returned to the water body, so it is not normally consumed in the cooling process. The use of cooling water is environmentally efficient, and this should continue to be possible. Of the water used in production, 90% is originated from surface water sources and the rest is consumed from groundwater sources. It is important to note that water use varies across Member States, and that the most beneficial solutions and technologies might differ from one location and situation to another. Care should therefore be taken to ensure that definitions and concepts related to water are clear, for example in relation to water use and water consumption, but also efficiency.

### **Skills, innovation and industry contribution**

The chemical industry has long-standing experience in providing water-related technologies and solutions. Examples include water reuse, pollutant reduction, and nutrient recovery. We stand ready to further contribute to sustainable water use and management. To do so, we need skilled talent, clear incentives, a stable and technology-neutral operating environment, and support for innovation. We very much welcome that the Water Resilience Strategy highlights skills in the water sector as a crucial factor for industry, innovation and competitiveness, and support the Commission’s plans to work together with industry and stakeholders to equip the EU water workforce with the right skills. We urge the Commission to include the chemical industry and our diverse actors in this cooperation as central enablers and innovators for sustainable water solutions. We are happy to see the different initiatives planned under the Water Resilience Strategy in this regard, and stand ready to contribute also in the form of sharing knowledge and best practices.

Alongside boosting skills and supporting the sharing of best practices, the Commission should work to remove barriers to the deployment of technologies and ensure access to funding for sustainable water solutions. The chemical industry should be remembered in the context of R&D funding under the Water Resilience R&I Strategy, the Water Smart Industrial Alliance as well as the Water Resilience Investment Accelerator to boost innovation and accelerate the demonstration and deployment of scalable water efficiency technologies and solutions.

### **Timeline**

The Water Resilience Strategy includes several flagship actions during the timeline 2025-2028. Actions include revising the Marine Strategy Framework Directive and reviewing the Water Reuse Regulation, Recommendation on the Water Efficiency First principle, guidelines and EEA report on the untapped water efficiency potential, establishment of a Water Resilience Investment Accelerator, a Water Smart Industrial Alliance and a European Water Academy. The Water Resilience Strategy also outlines intermediate targets for restoring and protecting the water cycle in the timeline 2027-2030, based on action under existing EU legislation such as the Nature Restoration Regulation, the Water Framework Directive, the Industrial Emissions Directive, the Water Reuse Regulation and the Urban Wastewater Treatment Directive.

### **Further information:**

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