

VIEWS ON THE FUTURE OF DIRECTIVE 2006/7/EC

28 November 2025

GENERAL COMMENTS

As an environmental NGO dedicated to the protection of the Ocean and its users, **SURFRIDER FOUNDATION EUROPE** (SFE) is a firm believer and first-hand observer that the Bathing Waters Directive was instrumental in improving the quality of Europe's bathing waters over the past decades.

When the final conclusions of the Bathing Water Directive (BWD) were released in early March 2025, the NGO welcomed with enthusiasm the key recommendations issued as they strongly aligned with the overall perception the organisation had of the successes and challenges the Directive was facing.

However, after several months of doubts and uncertainty, the NGO was deeply disappointed to learn this summer that the text would not be reopened for a full recast.

As we take note of the European Commission's intent to identify and pursue targeted updates rather than a comprehensive revision, Surfrider Europe wishes to recall its firm commitment to defend the Ocean and the health of the millions of people who enjoy it every day. The organisation stands prepared to work closely with decision-makers responsible for ensuring healthy waters for all, now and for generations to come.

UNEQUIVOCAL PROOF THE DIRECTIVE REMAINS AN ESSENTIAL ELEMENT OF THE EU ENVIRONMENTAL LEGISLATION

The BWD has played an undisputable role in driving Member States and local authorities to improve bathing water quality through harmonised, simple monitoring requirements and water quality standards, as well as obligations to improve bathing water management and strengthen public information.

In terms of efficiency, the financial effort required to implement the Directive is outweighed by the direct benefits. Full implementation costs are estimated at €575 million annually, while the Directive's direct benefits for human health are valued at €1 652 million per year. On top of these monetised estimations, clean and safe bathing waters also indirectly influence tourism development in many EU regions, citizens' well-being and the state of local biodiversity.

The Directive's EU added value is widely recognised. Binding legislation has driven a coordinated action across all EU Member States. Because waters transcend borders, only EU-level regulation can guarantee equal protection for public health and the environment.

While the Directive's crucial contribution to the improvement of bathing water quality in Europe cannot be questioned, findings of the evaluation report clearly indicate that there is still room for more ambitious action and align the BWD with today's environmental challenges and the state of scientific knowledge.

In this context, Surfrider European now holds high expectations that the Commission will take the necessary measures to effectively strengthen the implementation of the Directive's provisions and provide guidance to Member States to ensure consistent, ambitious, and forward-looking application across the Union. Making these adjustments is essential to address current societal challenges, ensure that bathing water management remains a success story within the EU, and uphold the Directive as a model of environmental legislation.

ENSURING A HARMONIZED AND CONSISTENT MANAGEMENT OF RECREATIONAL WATER QUALITY ACROSS ALL 27 MEMBER STATES

[With over 30 years of experience](#) in monitoring bathing and recreational water quality, and exchanging with stakeholders and authorities on the ground, Surfrider Foundation Europe has been a first-hand observer of the successes and shortcomings of the Directive. Based on this experience, extensive research and regular exchanges with our community, we published in 2020 our [Manifesto for Healthy Waters](#) in which we listed our key demands for an ambitious update of the Directive.

As the BWD is now set to undergo targeted adjustments rather than a full revision, the NGO seeks to reiterate the essential priorities needed to ensure an effective assessment of the Directive's enforcement.

Determining bathing and recreational sites and the monitoring season

[Conclusions of the evaluation report](#) are clear. The internal coherence of the Directive could be improved by clarifying the way bathing sites are determined. Furthermore, while the relevance of the legislation is not put into question, the current focus on a limited bathing season enters in contradiction with new bathing habits and does not allow for enough flexibility for Member States to adapt to those new circumstances.

Surfrider is a firm believer that to make sure the Directive is future-proof and remains relevant for the generations to come, it is essential to rethink the way in which seasonality and the selection of bathing sites are currently taken into account by the competent authorities

Everyone should be able to enjoy recreational and leisure activities in waters of excellent quality throughout the year. The framework currently provided by the Directive is too restrictive to adequately protect the health of citizens. Limiting our relationship to water to merely bathing does not provide a comprehensive depiction of how we may enjoy our blue spaces.

We observe an ever-increasing popularity of recreational activities such as surfing, kayaking, diving, sailing, kiteboarding... They are a source of physical health, of social and mental well-being, they are part our culture, but they are also an essential source of income within the sector of coastal tourism. Practitioners of aquatic recreational activities are exposed to the same risks as bathers and express similar concerns with regards to their health may be affected. Yet, they are in fact unfairly excluded from the scope of the Bathing Water Directive (BWD). Depending on the conditions, their practice occurs outside of the bathing sites officially defined under the Directive and they may thus risk not being informed on the health risk they run during their practice.

More guidance and clarity should be provided to ensure the scope of the Directive does not exclude any citizen. The definition of bathing sites cannot be not only be restricted onto the act of bathing as they also determine the rest of the provisions and requirements to manage bathing sites. Neither the designation nor the monitoring or type of management measures should be determined solely on the presence of bathers and the risks they run. Access to healthy waters should be guaranteed for all users, and the monitoring of bathing and recreational sites should permit to communicate and inform all citizens on the occurrence of potential health risks. Not a single

In addition, trends in water-based recreational activities, including swimming, have been evolving over the past decades. Climate change, visits to tourist sites spreading out over the year, etc. have led to changes in how we consider our blue spaces. The frequentation rate of coastal areas, rivers or lakes is expanding beyond the traditional summer period as a result of overall warmer temperatures. Recreational practices also vary across regions and evolve over the seasons. Some locations may be more

visited by recreational users over winter or autumn due to better conditions for their practice (in terms of currents, wave strength or length...). At the same time, these periods are often subject to intense rainfall contaminating inland and offshore water, thus posing more risks to the water quality.

Surfrider Europe considers it essential to incentivise and provide a adequate framework for competent authorities to reconsider and adjust the length of their monitoring season based on local habits and practices. In most European countries, due to higher water and air temperatures, the bathing season spans from late Spring to late Summer, during the high season for tourists and school holidays. It is essential to adapt to the evolving needs of society and be able to provide adequate and updated information to the public regarding exposure risks of bathing. People visit bathing and recreational sites regardless of the seasons and they are doing so in growing proportions. We cannot overlook these trends if we want to ensure the BWD fulfils its objective to protect human health.

Strengthening the role of the Directive as a driver to improve water quality

Coherence failures were identified during the evaluation of the BWD when it comes to its interactions with the Water Framework Directive (WFD). The two Directives could be better connected, and this is reflected in the way river basin management plans (RBMPs) and bathing water profiles. Neither integrates the other in a systematic and comprehensive way to adequately reflect the risk assessment of bathing sites and the management of the pollution sources that affect them.

Moreover, the state of “poor water quality” sites clearly illustrate the challenges we are faced with when it comes to pollution prevention. Since the Directive’s adoption in 2006, bathing water conditions have improved considerably, thanks to coordinated efforts by European institutions and national authorities. We especially observed a slow decrease in the share of these poor sites in the Union. However, more recent data show that the quality of Europe’s bathing waters has plateaued in later years.

The current management measures implemented by Member States have been too focused on preventing bathers' exposure to pollution and fail to tackle the causes of the pollution and their impact on the environment.

Year after year, [the reporting data compiled by the EEA](#) show little evolution in the share of bathing sites were classified as poor in Member States (1.5% for the 2024 compared with 1.9% for the 2009 season). There has thus been little improvement in recent years with regards to these sites, showing no progress towards the Directive’s objective to achieve at least sufficient water quality in all bathing sites in Europe (Article 5(3)).

The huge potential of these bathing profiles as catalysts for action has been largely underutilised, which is why Surfrider Europe Strengthen the power of bathing water profiles to ensure, that they serve as effective water management tools for local and regional authorities and reinstate the potential power these documents could have to become binding instruments for water management. Even though they have the potential to be great management tools for authorities, the bathing water profiles

often run the risk of looking like empty shells. Ensuring good bathing water quality should not solely imply sampling and testing the water but understanding the specific situation of each zone and taking action to remedy poor quality issues. This could be translated for instance into clear action and rehabilitation plans, with coherent and significant deadlines defined across a concrete timeframe.

Enhancing and streamlining processes to inform and involve the public

It is a matter of public health to make sure citizens have access to adequate information when practicing an aquatic leisure activity which may present the risk of being exposed to insufficient water quality. The evaluation of the Directive indicated that public access to information on bathing water is generally ensured, but the quality and effectiveness of this information could be enhanced to ensure a stronger public involvement. [Results of the public consultation](#) especially highlighted that while some users find the information clear, many report unclear or inconsistent signage on-site, and temporary pollution updates can sometimes be outdated.

Harmonised, accessible, quality information provided on the classification, the monitoring of bathing and recreational sites and regarding the management measures put in place need to become the norm across Europe, not the exception. That is why we believe that a stronger, clearer and streamlined framework should be established for the competent authorities to follow. The promotion of knowledge on water quality needs to help form a well-informed public. It must also be made easily available not only through new technologies but also on site. Public information should use standards common to all EU Member States, displayed through harmonized symbols and colours to ensure a Union-wide comprehension. We call the European Commission and Member States to enhance the enforcement of Article 12 of the Directive and improve communication to the public regarding water quality, reflecting on the different media available to reach out to the majority.

While access to information is one way to strengthen citizen engagement in the management of recreational waters, meaningful public participation is an equally crucial component. The current implementation of Article 11 of the Directive does not provide an adequate platform to empower citizens to take part in the implementation of the Directive. The provisions of the Directive lack clarity and create a framework that is too loose with regards to participatory processes.

For this reason, Surfrider Europe considers that public participation should be an integral part of the management of bathing and recreational sites. Obligations should be clarified and harmonised to guarantee stronger public participation. Current provisions lack specific details on how competent authorities should foster participation. Right now, the Directive only requires Member States to encourage participation, with no further indication, leading to inconsistent participation rates from the public across the Union... A clear framework must be provided to do so. Citizens should be consulted at least once a year regarding the compilation and update of designated sites in a clear and accessible manner.

Public participation should be extended to give the opportunity to citizen to help signal pollution and contribute to the elaboration of solutions as part of the pollution management plans put in place by authorities. This participation must be systematically promoted both on site to allow the majority of people to report pollution they have observed, to express their views on the management plans elaborated to deal with pollution and to report diseases with suspicions of direct links with bathing or recreational activities.

SUPPORTING A PROACTIVE APPROACH TOWARDS THE MONITORING AND ASSESSMENT OF WATER QUALITY

While the Directive was found to be overall effective, coherent and relevant to protect human health, results of the evaluation nevertheless underline that for what concerns emerging threats to bathing water quality, provisions remain insufficient. There is no doubt the BWD and its requirements remain essential to protect human health in the EU. Yet, they remain insufficient to address comprehensively the risks related to water quality. There is clear scope to strengthen its alignment with the latest scientific knowledge, technological capabilities, public concerns, and policy developments, including those set out in the European Green Deal.

The two current monitoring parameters, E. coli and intestinal enterococci, focus exclusively on human health risks and do not fully embrace the broader environmental public health concerns encompassed under the “One Health” approach. It is necessary, if the EU wishes to maintain role as a frontrunner in water policy, we need to further investigate on develop the current knowledge concerning exposure levels of sea users and the risks involved taking into account new threats in order to adapt our legislation to it. In line with the recommendations issued by the World Health Organisation, we argue that future efforts to strengthen the implementation of the Directive should pave the way for more parameters to be taken into account in official bathing water monitoring.

We call for the addition of parameters reflecting chemical pollution, harmful algal blooms and marine litter to be taken into account in the monitoring, and classification of bathing sites as well as in the development of management measures as part of the bathing profiles. We also call on the Commission to encourage Member States in their efforts establish innovative approaches for detecting chemical pollution o promote the sharing of effective practices across countries.

SFE wishes to present in particular here two notable examples of pollution that are currently insufficiently considered in the assessment of bathing water quality. The growing occurrence of Harmful Algal Blooms (HABs) and cyanobacteria, which increasingly affects bathing and recreational areas across the EU, requires urgent attention.

Cyanobacteria and harmful algal blooms (HABs)

Being directly involved in citizen science projects related to the monitoring of HABs, Surfrider Europe praises the Commission's support to ongoing research efforts and takes particular interest in the JRC's projects to further investigate good practices, detection methodologies and management measures to address the risks related to these toxic blooms. We encourage the completion of studies on the health and environmental impacts of HABs across the European coastline as the algae is indeed posing significant but diverse risks to human health and the environment depending on the geographical areas. The results should help define more comprehensive monitoring parameters and improve the information displayed to bathers and water sports enthusiasts to better address this rising threat

Alongside public and scientific authorities (municipalities, regional health agencies, urban areas, scientific research institutes and consultancies), SFE has been working on the ground since 2010 to better understand the emergence of the toxic microalgae *Ostreopsis*, first on the French Mediterranean coast, and more recently on the Basque coast. Aiming at preventing health risks for sea users and socio-economic risks linked to the closure of bathing areas, the NGO engages in regular exchanges with all stakeholders and established monitoring networks on both coasts, with the help of our local groups of volunteers. In recent years, Surfrider has been conducting samplings complementary to the official monitoring performed by the authorities while also systematically compiling testimonies from people who experienced the harmful effects of the *Ostreopsis* microalgae. [For the 2025 season for instance, a total of 114 testimonies were registered and 120 sampling campaigns, with 38 positive results from the samples collected.](#)

HABs and cyanobacteria can have direct harmful effects on human health, and their long-term impacts are still being studied. They present a notable risk across both fresh- and marine waters. Their identification at a bathing site should directly trigger action by Member States to protect human health and remediate this pollution on the long term. However, as there are no clear provisions regarding the monitoring and assessment of this type of pollution besides from the observation of visual cues (Article 8) and the pursuit of investigations (Article 9), local and regional authorities are left to take the appropriate measures on their own to deal with it. The lack of systematic monitoring of these phenomena poses serious concerns with regards to the risks of underestimating the magnitude of the pollution.

This is a widespread threat to bathing sites to which many Member States are already confronted. We call the European Commission to provide more support and guidance to establish harmonised methodologies and management measures that could help competent authorities face the issue and attend to the public's concerns. We call for the consideration of Harmful Algal Blooms (HABs) and cyanobacteria as a new biological parameter to monitor bathing water quality. These parameters should be systematically assessed for all bathing sites exposed to these blooms, and integrated into the classification methodology when deemed relevant based on local conditions.

Contaminants of emerging concern

The [current state of aquatic ecosystems](#) is highly preoccupying and the assessments performed under the BWD do not reflect this side of the reality. Conflicting results such as the share of water bodies in good chemical status (29%) versus the share bathing sites in excellent water quality (85%) further emphasize these discrepancies. Such classification system may fail to flag the hazards not reflected by the current two faecal indicators. Some bathing sites may be classified as 'excellent' under existing standards for bathing water quality even when situated near industrial zones where chemical pollutants could present a danger. While the Directive has successfully mitigated the most frequent health risks from microbial contamination, it has been much more challenging to address other threats as they remain largely underreported under current obligations.

Findings of the evaluation did underline the potential for better complementarity between the Directive and other environmental legislation, as well as the objectives of the European Green Deal. While the 2006 revision reduced the number of parameters monitored for bathing water quality, current standards may now overlook a certain number of factors affecting water quality still. Better integration and cross-references between BWD and WFD results in particular should be further explored when reviewing the implementation of monitoring and assessment obligations.

As an example, concern around PFAS contamination has intensified in the public eye in recent years. Investigative reports have documented the [extensive spread of these persistent chemicals across Europe](#), including areas close to bathing and recreational waters. Research has also drawn attention to the potential environmental and health risks linked to [elevated PFAS levels found in seafoam](#). As awareness of these substances grows, it becomes increasingly important to reconsider how the chemical condition of our aquatic environments is reflected in the current assessment and classification of bathing waters as these preoccupations remain completely overlooked.

For instance, the [Netherlands](#) as well as the [region of Flanders, Belgium](#), have started to investigate the potential risks linked to the presence of PFAS on coastal areas and in bathing sites, until competent authorities eventually published advisory threshold values for bathing waters. Concerns over the presence of these substances in high concentrations even led, in some cases, to the [preventive closing of some bathing areas in the Netherlands](#).

Closing existing knowledge gaps will require targeted research, particularly epidemiological studies on recreational water users, to better assess exposure levels and related health impacts. In parallel, in line with the precautionary principle, a systematic assessment of chemical risks should be integrated into bathing profiles to indicate the likelihood of public exposure. Surfrider advises in favour of the establishment of a watch list for bathing and recreational sites—under Annex I of the Directive—must be established, containing high-priority chemical substances recognised as harmful and intended to expand the current monitoring parameters. Finally, transparent and clear communication on chemical pollution must be ensured

so the public is fully informed about the condition of the waters they use. This combination of improved monitoring, research, and public information is crucial to protect European citizens and restore confidence in bathing water quality.

CONCLUDING REMARKS

In light of the Commission's ongoing work on the future of the Bathing Water Directive, Surfrider Foundation Europe wishes to reiterate its unwavering support for a Directive that has been undeniably successful in improving bathing water quality across Europe since 2006 and even beyond.

That being said, the evidence collected and compiled throughout the revision process, as well as the NGO's own experience on the field clearly indicate that its current framework needs to be strengthened and enhanced to better face today's environmental realities, public health concerns and scientific advances. The health of our Ocean, seas, rivers and lakes that needs to be protected further. To do so, this brief identified key areas for improvement, highlighting existing caveats and shortcomings that a targeted action at EU level could help streamline to ensure a more effective, future-proof implementation of the Directive. It is Every citizen's right to enjoy healthy blue spaces.

Surfrider Europe remains committed to engage in constructive exchanges and collaboration to ensure that Europe's bathing waters continue to progress and remain safe, healthy, and resilient for present and future generations.

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ABOUT SURFRIDER FOUNDATION EUROPE

SURFRIDER FOUNDATION EUROPE is a non-profit organisation whose purpose is to protect and showcase the importance of lakes, rivers, the ocean, and and the people who enjoy them. It currently has over 15,000 members and is active across 12 European countries through its volunteer-run branches. For 35 years, Surfrider Foundation Europe has been working with all stakeholders in society (citizens, the private and public sector) on three main themes: marine litter, water quality and health, coastal development and climate change. Our levers for action are: education, citizen mobilisation, the transformation of polluting industries and changes in legislation.



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