

(English version)

**Question for written answer E-004875/25  
to the Commission**

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(10 December 2025)

*Subject:* Inadequate collection and assessment of data and possible conflict with legal provisions laid down in the EU Water Framework Directive (in particular Articles 4, 8 and 11, and Recital 28)

Very high concentrations of mercury have been found in fish and shellfish in the Limfjord — 5 to 12 times higher than the limits set in the EU Water Framework Directive. The tests featured in *Giften i sandet* ('Poison in the Sand'), a Danish TV 2 documentary series focusing on the activities of chemical company Cheminova in the Thyborøn-Harboøre area since the 1940s and the effects of the toxic waste dumped there.

Given the excessively high mercury levels and the acknowledged lack of action on the part of the authorities, questions have been raised as to whether — in the light of the recent court ruling concerning Ireland (CJEU judgment 62024CJ0204) — the Danish authorities are in breach of EU law by no longer complying with the requirements laid down in the EU Water Framework Directive. The ruling confirms that, under the EU Water Framework Directive, Member States are obliged to take practical steps to achieve and maintain good chemical status in the aquatic environment.

Given that very high concentrations of mercury that exceed the EU limits have been detected in the Limfjord, please answer the following two questions:

1. Has Denmark met its obligations under the Water Framework Directive by taking the necessary clean-up action and drawing up a plan with possible follow-up to ensure that 'good chemical status' is achieved in the Limfjord?
2. Has Denmark carried out adequate water quality monitoring in the area to ensure that the relevant environmental status data have been collected and used in accordance with the requirements laid down in the directive?

Submitted: 10.12.2025

**Answer given by Ms Roswall on behalf of the European Commission**  
(5 February 2026)

The Commission's evaluation of Denmark's 3rd River Basin Management Plans (RBMP) <sup>(1)</sup> has identified as a key implementation challenge that Denmark's coastal waters have almost all failed to achieve good status.

Denmark's corresponding Environmental Geographic Information Systems <sup>(2)</sup> show that the Limfjord fails to meet good chemical and ecological status.

These findings indicate significant implementation problems. This is seen in the deterioration of coastal water status, an increase in surface water bodies with an observed mercury exceedance, a lack of clarity of how the proposed measures will contribute to ending the exceedance of individual priority substances by 2027, and the absence of sufficiently specific justifications for the invoked exemption grounds for individual water bodies.

It is worth recalling that exemptions in the form of time extensions are only allowed after 2027 when all the measures are in place to ultimately achieve good status <sup>(3)</sup>.

The Water Framework Directive <sup>(4)</sup> lays down that point source discharges need prior regulation or registration. The Commission notes that the 3rd RBMPs stated that after a stock-taking and permit review exercise, the revised 3rd RBMP would include new abatement measures. The revised 3rd RBMP has just been published with one year delay.

The Commission intends to raise these important implementation issues during the upcoming Structured Water Dialogue with Denmark and will explore how Denmark can be assisted to overcome these implementation barriers.

As with other structural dialogues, the Commission reserves the right to take suitable enforcement actions, noting that it prioritises its enforcement efforts on cases pointing to a systemic breach of EU law.

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<sup>(1)</sup> SWD(2025) 34 final.

<sup>(2)</sup> 'MiljøGIS for høring af genbesøg af vandområdeplaner 2021-2027', <https://miljoegis.mim.dk/spatialmap?profile=vandrammedirektiv3genbesoeg2024>.

<sup>(3)</sup> 'Natural conditions'.

<sup>(4)</sup> Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy, OJ L 327, 22.12.2000, p. 1-73, as amended by Commission Directive 2014/101/EU of 30 October 2014, OJ L 311, 31.10.2014, p. 32-35.