



EurEau position on the Commission proposal for the simplification of the INSPIRE Directive (COM(2025) 985)

Ensuring resilience to increasing security threats

Summary

The INSPIRE Directive must be consistent with EU legislation aimed at protecting critical entities and vital societal services. The protection of public health and the environment must prevail over the right to access certain spatial data. Member States should be required to ensure that spatial data of infrastructure managed by the sectors listed in the annex to Directive 2022/2557 should not be made publically accessible, unless it are not security-relevant.

The limitation only applies to spatial data and not to environmental data.

1. Introduction

EurEau welcomes the goal of this revision, i.e. to modernise and simplify the provisions of the Inspire directive by removing technical requirements for data and data sharing, and aligning its obligations with more recent horizontal EU data legislation. EurEau members have also identified the duplication of reporting requirements as a major cost factor in the practical application.

Drinking water and wastewater service providers are **users** of geospatial data sets and benefit from a well-functioning system.

On the other hand, they are also **providers** of such data in application of Annex III of this Directive, which specifically includes “utility facilities such as sewage ... and water supply” in its scope.

One of the weaknesses of the Commission proposal lies in the fact that the consistency check with other Union policies is limited to data-related EU legislation while omitting security-related requirements.



2. Critical infrastructure protection must prevail over access to spatial data

As a starting point, EurEau supports efforts to increase the access of the public to environmentally relevant data in line with Directive 2003/4/EC¹. As part of our commitment to provide resilient, safe, sustainable and affordable water services, the public should also have access to many categories of environmental information stemming from water and sanitation services.

However, we call on the co-legislators to **distinguish between environmental data and spatial data**. In the light of the extremely volatile global context, and an increasing number of hybrid warfare acts, EU legislation must ensure the **protection of critical infrastructure** to prevent malicious acts and protect public health and the environment.

Water service providers are:

- ~ Identified as critical entities under Directive 2022/2557². Requiring public disclosure of detailed spatial data on the drinking water and wastewater infrastructures would contradict operators' obligations under this Directive to identify and mitigate vulnerabilities. INSPIRE should therefore explicitly recognise the **primacy of critical entity resilience requirements** over non-essential public-access obligations.
- ~ Required to identify and eliminate vulnerabilities in their systems. Article 1.8 of Directive 2022/2557 states that 'the obligations laid down in this Directive shall not entail the supply of information the disclosure of which would be contrary to the essential interests of Member States' national security, public security or defence'. The INSPIRE Directive should be fully consistent this directive.
- ~ Described as essential to maintain vital societal functions under all circumstances in the Joint Communication JOIN(2025) 130 final³,
- ~ Required to establish water safety plans and to assess and manage vulnerabilities in the water supply system according to directive 2020/2184⁴.

Public access to spatial data on the exact location of water abstraction points, underground water utility networks, pumping stations, biogas storage tanks and treatment facilities is identified as a vulnerability that needs to be mitigated.

With a view to ensuring policy coherence and protecting public health and environmental protection, **article 13 of the INSPIRE Directive must be clarified and strengthened**. Spatial data of infrastructures managed by the sectors listed in the annex to Directive 2022/2557 should not be made publically accessible, unless it is not security-relevant. In other words, the **possibility** for Member States to limit public access to spatial data sets where such access could adversely affect public security **should become an obligation**.

¹ Directive 2003/4/EC on public access to environmental information.

² Directive 2022/2557 on the resilience of critical entities and repealing Council Directive 2008/114/EC.

³ Joint Communication on Preparedness Union Strategy.

⁴ Directive 2020/2184 on the quality of water intended for human consumption (recast).

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→ For the purpose of this Directive, security-relevant spatial data should be understood as any geospatial dataset that directly or indirectly reveals the location, layout, or operational details of facilities the disruption of which could significantly affect essential services as defined in Directive 2022/2557.



About EurEau

EurEau represents Europe's water sector, bringing together 70,000 public and private drinking water and wastewater service providers across 33 countries.

We work with EU institutions and international organisations to ensure legislation supports resilient, sustainable and affordable water services by protecting water quality, promoting resource efficiency and safeguarding access to water.



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