

DG SANTE SUD workshop 25 June 2021

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25 June 2021

Who we are



- ~ EurEau is the European
 Federation of Water Services
- ~ 34 national associations of drinking and waste water operators from 29 European countries
- ~ Providing "essential services"
- ~ Realising the human right to water and sanitation
- ~ Protecting health + environment









Protection of water resources



- ~ Prerequisite to realise our mission
- ~ Legal obligations to protect water resources: art.7.3
 WFD and art.8 new DWD
- ~ The less a drinking water resource is polluted, the less technical water treatment is necessary -> drinking water can be delivered as a natural foodstuff.
- ~ Drinking water operators are capable to treat any type of raw water: consider consequences of treatment ->life cycle approach to pesticides
- ~ But "Do we as a society and individual citizen prefer a natural composition or a **highly treated** and **processed** product?"

Legislative framework



Water Framework Directive (WFD)

Control at source

Cost Recovery Principle

Polluter Pays Principle

The water consumer should not bear the cost of extra treatment, but the polluter-pays principle should be applied.

Drinking Water Directive (DWD)

Pesticides: 0,1 µg/l



in active substances, metabolites and transformation products

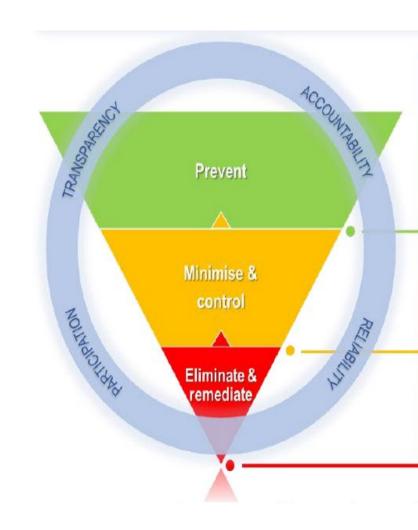
The extra-treatment has been applied increasingly over the past 20 years to comply with the DWD - consumers pay more.



- ~ EurEau supports the F2F targets on pesticide use + risk reduction:
 - ~ Support Commission **2015-2017 baseline**
 - ~ These must be converted to binding targets to be achieved at EU and MS levels
 - ~ Actions to reduce pesticides use and then emissions to water bodies must be prioritised
 - ~ But careful: avoid "regrettable substitutions"!
 - ~ Essential to comply with the DWD parametric values
 - ~ Priority Substances Directive revision is an opportunity to create coherence with DWD and SUD:
 - EQS for Total Pesticides in Surface Water too!



- ~ Costs/savings/benefits to wider society and environment
- Water operators have to invest more and more to treat pesticides pollution in the aquatic environment and comply with DWD standards
- ~ Extra-treatment means increase in energy consumption → not in line with climate neutrality
- ~ Higher costs for consumers → affordability concerns
- Problem of transformation products and metabolites
- ∼ It is not in line the Zero Pollution Hierarchy :
 - ∼ Precaution + Prevention + Source control + Polluter Pays





- We support the development of mandatory crop-specific standards for IPM and link payments under CAP to the proven fulfilment of IPM standards
- We are in favour of detailed training for independent advisors on IPM
- More transparency in the information on the use of pesticides in catchment areas is needed: access to this information is fundamental for water operators
- ~ In favour of streamlining the F2F targets reporting, NAP reporting requirements and CAP National Strategic Plans to better control progress towards decrease of emissions



- ~ We support all 3 options on training/advisory systems:
 - ~ Training ALSO for those using and applying PPP (not only buying)
 - ~ Mutual recognition of certificates
 - ~ Independent Advisors
- Strong support for more and better monitoring data and easier access to data for water operators: necessary for Risk assessment of supply system (new DWD)
- ~ Support for both options on restriction on sales: only to «educated» professionals.
- ~ Amateur users have very easy access in retail outlets today
 - ~ Who will prescribe the substances? The certified independent advisors?



- We support restrictions for sensitive areas, and especially Drinking Water Protection Zones
- Particular attention should be given to those hazardous pesticides that are easily transported through water
- ~ Commission to extend the scope to Biocides within the SUD revision as per the SUD text:

(2) At present, this Directive should apply to pesticides which are plant protection products. However, it is anticipated that the scope of this Directive will be extended to cover biocidal products.

10. 'pesticide' means:

- (a) a plant protection product as defined in Regulation (EC) No 1107/2009;
- (b) a biocidal product as defined in Directive 98/8/EC of the European Parliament and of the Council of 16 February 1998 concerning the placing on the market of biocidal products (2).

Thank you for your attention



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