



EurEau comments on the Farm-to-Fork Strategy

Sustainable water is essential for sustainable food

Summary

The water sector strongly supports the Farm-to-Fork Strategy. If fully and ambitiously implemented, it will protect water resources now and for future generations. EurEau calls for stronger policy coordination with the EU's water-related legislation, the greening of the CAP, the effective implementation of pesticide rules, the drastic reduction of nutrient losses, more support for organic farming and the responsible use of antimicrobials. Water operators stand ready to step up cooperation with farmers in this transition process.

1. Introduction

The Farm to Fork Strategy (COM (2020) 381) is at the heart of the **Green Deal**. It addresses the challenges of sustainable food systems and recognises the links between healthy people, healthy societies and a healthy planet.

Water and agriculture are intrinsically linked. **The intensive use of anthropogenic substances such as nitrates, pesticides and veterinary medicines, including their metabolites, is increasingly harming the aquatic environment in general and drinking water resources in particular.**

With this in mind, EurEau welcomes the publication of the Farm to Fork (F2F) Strategy and supports its **full value chain approach**. The success of the strategy will largely depend on its full alignment with other components of the Green Deal, including its **zero pollution** ambition, **climate change** goals and **circular economy** strategy.

2. Considerations of the water sector

Make the Water Framework Directive (WFD) a core element of sustainable food systems

In its evaluation of the Water Framework Directive (WFD)¹, the Commission identified the need for more coherence between it and other policies, for example, agricultural

¹[https://ec.europa.eu/environment/water/fitness_check_of_the_eu_water_legislation/documents/Water%20Fitness%20Check%20-%20SWD\(2019\)439%20-%20web.pdf](https://ec.europa.eu/environment/water/fitness_check_of_the_eu_water_legislation/documents/Water%20Fitness%20Check%20-%20SWD(2019)439%20-%20web.pdf).



policy. The proposed **legislative initiative for a framework for a sustainable food system** could lead to the much needed systemic change provided it incorporates the goals and requirements of the EU's water legislation and in particular the WFD and its daughter directives and the Nitrate Directive. This is not sufficiently reflected in this Strategy.

The third WFD River Basin Management Plans should put a strong emphasis on measures addressing agricultural emissions with a view to improving the quality of the aquatic environment in terms of pollution from pesticides, nutrient excesses and veterinary medicines.

Extended producer responsibility (EPR)

In line with Article 191.2 (TFEU) and Article 9 (WFD), we strongly believe that EPR schemes should be applied to pesticides, nutrients and veterinary medicines in the aquatic environment. **The Polluter Pays Principle must not be replaced by the water-consumer-pays principle.**

The Common Agricultural Policy (CAP) needs "blueing"

EurEau² understands the farmers' need for support in the complex transition phase towards sustainability and zero-emission practices. The F2F Strategy rightly points out that the CAP is the best-adapted tool in this respect. To be successful, the **conditionality requirements need to be extended**. No support should be given to farmers for practices which conflict with EU water legislation goals as fixed in the WFD, the Ground Water Directive, the Drinking Water Directive and the Nitrates Directive.

The **Farm Sustainability Tool for Nutrients** could become a powerful tool provided it is well designed and its recommendations are effectively implemented. **The eco-schemes must remain compulsory** and offer funding for additional measures at national level to improve soil and water quality.

Water quality and quantity should be part of the priorities in the **national strategic plans** to be drawn up under the new CAP.

Pesticide legislation must be strengthened

EurEau strongly supports the goal to **reduce the use of chemical pesticides and the related risks by 50% by 2030**. The contamination of drinking water resources with pesticide active substances and their degradation products continues to be one of the most pressing problems encountered by drinking water suppliers. Questions remain as to how the 50% reduction in risks will be measured.

EurEau believes that the EU's extensive legislative framework on pesticides is only partially delivering today. Therefore, EurEau welcomes the **revision of the Sustainable Use of Pesticides Directive** (2009/128/EC, SUPD). After over a decade of experience with SUPD National Action Plans (NAP), we conclude that **it is a weak**

² <http://www.eureau.org/resources/position-papers/3326-eureau-position-paper-on-the-revision-of-the-common-agricultural-policy-1-3/file>.



and inefficient instrument, which lacks the enforcement measures needed to reduce the risks and impacts of pesticides on drinking water resources.

The NAP process is effective in bringing stakeholders from different sectors together, it has defined ambitious targets and strong indicators, but when it comes to applying measures, it **lacks the political and legislative backing needed for effective implementation, possibly due to a lack of European supervision.**

The revision of the SUPD should therefore introduce a mechanism which:

- ~ defines clear targets (with a view to achieving zero emissions by 2030) which can be monitored and evaluated
- ~ defines a clear timeframe for reaching the targets
- ~ establishes a systematic approach which allows for monitoring actions and measures taken and for their contribution to fulfilling the defined targets
- ~ defines safeguard zones for surface and groundwater used for the abstraction of drinking water, where pesticides must be neither used nor stored
- ~ obliges Member States to enforce the measures needed to fulfil the targets.

Examples of actions that we believe would lead to the more sustainable and responsible use of pesticides are:

- ~ withdrawing approvals in case of critical concentrations
- ~ enforcing or tightening application restrictions
- ~ replacing harmful substances by low-risk substances
- ~ increasing funding for water protection advisors
- ~ increasing and/or making available funding to undertake catchment monitoring
- ~ matching official advice for the farmers on best practice in terms of water resource protection with strong enforcement action.

Pesticide authorisation

When authorising pesticides, the **effects on water quality, and drinking water sources in particular, must be taken into account.** It is not only necessary to test against the European approval standard for the aquatic ecosystem, but also against the standards that are set for it by the WFD. An analysis method must be available at the time of authorisation to determine whether the substances cause water quality problems after use and whether the WFD standard might be exceeded.

Pesticides which are hazardous for the aquatic environment and human health should lose their authorisation.

Furthermore, EurEau urges the Commission to present guidance as to how the formation of possible hazardous transformation products in the drinking water treatment process should be included in the pesticide approval requirements of [Regulation 1107/2009](#).

Nutrient excesses must be stopped

The F2F Strategy fails to emphasise the **impact of nutrient excesses on the quality of drinking water resources.** Excessive nitrate levels in groundwater used for



drinking water production are responsible for hundreds of millions of euros of extra treatment costs for drinking water suppliers. This cost has to be borne by water consumers. A general reduction goal of nutrient losses of at least 50% is an important step, but it must be remembered that, due to the local or regional (hydro)geological conditions, the recovery of aquifers may need many years or even decades.

The Farm Sustainability Tool for Nutrients and the CAP conditionality provisions must ensure that nutrient leakage and run-off are prevented and **the goals of the Nitrates Directive are fully complied with everywhere in Europe.**

Precision farming should be promoted to optimise nutrient use.

EurEau welcomes the proposal to develop an **integrated nutrient management action plan** to address nutrient pollution at source and increase the sustainability of the livestock sector. However, this action plan must adopt a holistic approach and **include** nutrients recovered from **other sources including waste water.**

Organic farming needs more support

EurEau welcomes the Commission's intention to put forward an Action Plan on organic farming which aims to **stimulate the supply of and demand for organic products.** Organic farming is the agricultural production system offering the **highest level of protection** of the aquatic environment and drinking water resources against pollution with nutrients, pesticides and veterinary pharmaceuticals.

Antimicrobials emissions to the aquatic environment need to be reduced

EurEau fully supports the EU's intention to reduce the excessive use of antimicrobials in animal healthcare, as these can find their way into drinking water resources.

At the same time, EurEau calls on decision makers to ensure that **environmental information on veterinary medicines is made transparent and available.** This includes information on intrinsic substance properties such as solubility, mobility, degradability and behaviour in the aquatic environment. Access to this information will inform risk management measures aimed at protecting the aquatic environment.

The impact of the active substances on the aquatic environment and drinking water production must be included in the approval process.

Water quantity must be included

EurEau believes that the strategy should not be limited to water quality, but also **address water quantity.** In light of the impacts of climate change and increasingly recurring drought events, **excessive water abstraction for irrigation purposes must be avoided,** since it causes local disruption to the security of drinking water supply. Notwithstanding recital 17 of Regulation (EU) 2020/741 on water reuse, **reclaimed water from waste water treatment** can be used to irrigate agricultural land in the event of water shortages.



Circular, bio-based economy must not be detrimental to the water sector

The Strategy encourages farmers to diversify their income through biogas production and states that “Farms also have the potential to produce biogas from other sources of waste and residue including sewage and waste water”. We insist that **measures should lead to sustainable solutions, respecting the investments already made by the water sector to minimise the volume of sludge and maximise the production of biogas.** The future enabling framework should allow cross-sector working to maximise the value of existing assets. Furthermore, the liquid matter (liquors) from the digestion process, either from digesting waste water sludge or manure, should be treated and this can be done in a waste water treatment plant more sustainably and continuously.

In this context, it is worrying to see that **France recently banned to co-digestion** of biomass together with sewage sludge by waste water operators.

With a view to saving natural resources, enhancing the circular economy, securing sustainable food production, and in the light of the Roadmap for the UWWTD review, the Farm-to-fork Strategy should **incentivise farmers to use quality sewage sludge or nutrients extracted from sewage sludge to improve the fertility of soils** except in drinking water abstraction areas.

Dialogue and participative approach

The water sector is ready to cooperate with farmers at all levels to progress in this transition process. The experience from many countries and regions shows that **cooperation between water suppliers and farmers** makes it possible to go beyond regulation and improve the quality and quantity of water resources. Farmers voluntarily participate in complementary measures, thus developing new agricultural activities that are economically viable and environmentally beneficial to water quantity and quality.

EurEau has collected examples of cooperation projects to protect drinking water resources between water suppliers and farmers³.

About EurEau

EurEau is the voice of Europe’s water sector. We represent drinking and waste water service providers from 29 countries in Europe, from both the private and the public sectors.

Our members are the national associations of water services in Europe. The EurEau secretariat is based in Brussels, from where we coordinate the work of around 200 experts from member organisations and utilities and advocate common positions with EU decision makers.

Our members are fully committed to the continuous supply of clean water and its safe return into the water cycle. We have a role in raising awareness of threats to the water environment. With a direct employment of around 476,000 people, the European water sector makes a significant contribution to the European economy.



³ <http://www.eureau.org/resources/briefing-notes/4433-briefing-note-on-cooperation-projects-between-water-operators-and-farmers/file>.