



EUREAU response to the EC Questionnaire on the Fitness Check on Water Policy

28.02.2012

Introductory questions

Your name (optional) (between 3 and 20 characters; count: 0)

Please select your country of residence

* (compulsory)

What organisation do you represent?

* (compulsory) (between 1 and 30 characters; count: 0)

Please choose from the following categories the most relevant to the organisation you represent.

* (compulsory)

- National Administrative Body
- River Basin Authority or other water manager
- Industry
- International Organisation
- NGO
- Academic member of general public
- Other

If your work or concerns are associated with a particular sector, please give the name of that sector [examples: agriculture, navigation, hydropower, energy, other].

(optional) (between 2 and 100 characters; count: 0)

EUREAU is the European Federation of National Associations of Water and Wastewater Services. EUREAU gather 10.000 water & waste water utilities & operators across Europe that provide sustainable water services to around 405 million European citizens.

European f

If your work or concerns are associated with a particular river basin, please give the name of that river basin.

(optional) (between 2 and 200 characters; count: 0)

n/a

Relevance of EU freshwater policy

1. Since the 1970s a range of EU Directives have been adopted to protect Europe’s waters. Do you consider that this EU legislation has improved the quality of Europe’s surface and ground waters?

* (compulsory)

- Yes
- No, it has not significantly improved the quality of waters
- No, most changes would have happened in any case
- I don't know

Addressing the challenges facing Europe’s waters

2. There are many challenges facing Europe’s waters and those that depend upon them. Do you consider that EU freshwater policy is adequate in its scope and detail to address the following issues (now and in the future)?

	Yes	No	Partially	Do not know
Protection of ecosystems and biodiversity * (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Protection of human health * (compulsory)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pollution from industry* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Pollution from urban areas * (compulsory)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pollution from agriculture* (compulsory)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Over abstraction of water by agriculture* (compulsory)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sustainable land use* (compulsory)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Hydromorphological changes of surface waters* (compulsory)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduction of flood risks* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Climate change* (compulsory)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water scarcity and water availability * (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Droughts* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Water efficiency by users* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Leakage from water distribution systems* (compulsory)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fostering innovative solutions to deal with water challenges* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Protection of river basins as a whole* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please comment to explain any or all of your answers (please be clear which subjects you are commenting on) and make any recommendations you consider would improve the way EU water policy could address these issues.

(optional) (maximum 2000 characters; count: 0)

Many of the challenges listed cannot be addressed solely by EU freshwater policy. There is an urgent need to improve the integration of water-related objectives, as defined by the water policy framework, into closely-related policies such as those on chemicals (REACH), agriculture, energy and cohesion. Similarly, transversal policy tools, such as the multiannual financial framework or the annual growth review, must systematically identify water challenges as a priority for Europe and integrate it.

The current freshwater policy framework need to be improved to systematically integrate the protection of water resources at source, the protection of the environment and the ecosystems and addresses the challenges related to sludge management and water recycling.

Type of instrument

3. Different types of policy instrument have been adopted to address different challenges of water management, including Directives with specific obligations, framework legislation, non-binding guidance, etc.

Please rate on a scale of 1 to 5 how successful the following instruments addressed by the Fitness Check have been in addressing the challenges facing water management?

[1] is not successful at all and [5] is very successful.

	1	2	3	4	5
Water Framework Directive* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Groundwater Directive* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Directive on environmental quality standards in the field of water policy* (compulsory)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Nitrates Directive* (compulsory)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Urban Waste Water Treatment Directive* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Floods Directive* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Communication on Water Scarcity and Droughts* (compulsory)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
White paper on climate adaptation* (compulsory)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please comment to explain any or all of your answers (please be clear which policies you are commenting on).

(optional) (maximum 2000 characters; count: 0)

A number of policy instruments have not delivered the results expected. Reasons are varied but often linked problems associated with implementation and articulation with other policy tools.

As an example: whereas the provisions of the Nitrates Directive might be deemed adequate, nitrate content in EU waters show that the results on groundwater and surface water are not meeting the expected objective. This may largely be due to implementation / enforcement problems. It may also be due to an inconsistency between the requirements of the 1991 Nitrates Directive (50mg/l Nitrates; 0.1 microgram/l Pesticides, prevention against eutrophication) and the objectives of the 2001 WFD. In fact, given the intensification of agricultural practices, as long as nitrates compounds are applied, it is likely that farming will carry on having an impact on water resources in most of the EU and will remain the main source of nitrates in EU waters. Whereas the Nitrates Directive should serve its purpose to reduce the amount of nitrates and thus contribute to the objectives of the Water Framework Directive, this is not the case currently.

Gaps in the policy framework

4. Even with the adoption of the Water Framework Directive and adoption of further legislation and policy over the last ten years you may consider that there are still gaps in the policy framework at EU level for freshwater or that new issues have emerged.

Do you consider that there are still gaps in the policy framework at EU level?

* (compulsory)

- Yes
- No

Please comment to explain your answer and, if possible suggest how any gap should be addressed (e.g. by guidance, funding, binding legislation, etc.).

(optional) (maximum 2000 characters; count: 0)

The current framework does not adequately address the following issues: 1. Recycling/reuse, 2. Sludges, 3. control of pollution at source and . 4. REGULATION (EC) No 1107/2009 concerning the placing of plant protection products on the market. 5. urban water collection system

1. Water recycling/reuse is an important area which is not yet properly addressed by the EU policy framework. Although Directive 91/271/EC states that “treated waste water shall be reused whenever appropriate” it has not delivered a definition of appropriateness. To-date, the uptake of water recycling and reuse has been driven primarily by demand for reliable water resources at the local level. Consequently, the member states have developed a variety of regulations over time which reflects a broad range of approaches, types of applications covered, and water reuse criteria. Moreover, they are based on empirical or semi-empirical data and not on epidemiological and risk assessment studies. The lack of a (unified) regulatory framework causes a lack of confidence of providers and users and entails a lack of funding and consequently investment. The WFD should be a driver for water recycling in integrated river basin management. Water recycling and reuse may be a viable measure to contribute to achieving the objectives of achieving “good status” in various ways (reduced discharge into surface waters, less abstraction from conventional resources, local sourcing of water).

2. Sludges : Sewage sludge is source of nutrients (mainly phosphorus, nitrogen and organic matter), and can produce energy or materials after ad-hoc treatments (anaerobic digestion, incineration, biotechnology, etc.). Sludge management should feature highly in a sustainability framework and has to be promoted by the new fertiliser legislation (taking into account both sludge and biowaste).

EUREAU's view is that sludge should be managed as a resource in line with current EU thinking embodied in various policies as EU2020 on renewable energy and GHG reduction and on resources. However, **EUREAU is concerned** that, for different reasons (social acceptability, costs, legal constraints), each major route for sludge handling (organic recovery, incineration, landfilling) is and will continue to become more and more complex to deal with. This will lead to problems all over Europe, and in particular for small and medium size WWTP, for which some routes for sludge management are expensive and difficult to put into place. For organic recovery, EUREAU calls for keeping a specific legal tool. A revision of the sludge directive under the umbrella of Waste policy is one possible approach, but due to the sludge characteristic to provide nutrients for soils and crops, alternative approaches might arise under fertiliser and/or soil regulations.

3. Control of pollution at source should be the absolute priority for limiting hazardous substances entering the environment. EUREAU calls for coherent and holistic legislation in that respect. This includes:

- the adaptation of REACH to the water sector (remove the notion of tonnage, consider all compounds incl. pharma, biocides and cosmetics, integrate the concept of mixtures of substances, take into account life cycles of products)
- address substances that are problematic today and for which REACH can be used as a tool: DEPH, TBT, NPE, Cd, Hg
- Coordinate EQS legislation with REACH and other related legislation
- Develop an approach of "drainage catchment"

Further guidance on the interpretation of the EU water legislative framework would also be beneficial; For instance, Article 9 of the WFD on cost recovery appears to be particularly challenging in terms of implementation. Further guidance would be helpful.

4. Plant protection products: There is an inconsistency between the requirements of the REGULATION (EC) No 1107/2009 OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL of 21 October 2009 concerning the placing of plant protection products on the market and the objectives of Directive 2000/60/EC (WFD).

Article 21 of the regulation (EC) No1107/2009 will provide a link between the review of the approval of an active substance and the objectives of the WFD. In this context the Commission may review the approval at any time there are indications that the achievement of the WFD-objectives are compromised in groundwater and surface water. EUREAU appreciates the steps that the European Commission has taken. However, this will only be possible after monitoring of water bodies shows the residues in the water.

EUREAU is of the opinion that a better approach would be to make sure that these residues should not get into the water in the first place.

EUREAU still has concerns concerning the residues that are left in surface water. In our opinion, the requirements provided in article 4 and 16 (1) and (8) of the WFD should be more strict and implemented properly so the plant protection products will not get into the surface water at all so they will not have to be taken out afterwards. Besides this regulation (EC) No1107/2009 should be reviewed regarding the criteria for the approval of active substances (Annex II). At present only the "fate and behavior concerning groundwater" (3.10) is considered in the course of the approval and should be extended with approval criteria which take also circumstances of surface water bodies and their necessary protection level into account.

5. Urban water collection system is the first step of a good protection of the aquatic environment from urban pollution and is not conveniently addressed by current legislation, specially referring to Combined sewer overflow (CSO):

- Urban wastewater treatment Directive (91/271/EEC) which mentions that the design, construction and maintenance of collecting systems shall be undertaken with the best technical knowledge not entailing excessive costs regarding limitation of pollution of receiving waters due to storm water overflows. Also remark that given that it is not possible in practice to construct collecting systems and treatment plants in a way such that all waste water can be treated during situations such as unusually heavy rainfall, member States shall decide on measures to limit pollution from storm water overflows. Such measures could be based on dilution rates or capacity in relation to dry weather flow, or could specify a certain acceptable number of overflows per year. In practice, the directive has been proved to be too vague and inefficient on this matter.
- Water Framework Directive (2000/60/EC) which aims to achieve the good ecological status of all waters by 2015. Combined sewer overflows (CSO) seem to be considered in several river basin management plans (RBMPs) as a pressure causing an serious impact on the receiving waters, but frequently CSO are not correctly addressed in the river basin management plans probably because in many cases they don't cause a long term impact that could threaten the waters not to fulfill the good ecologic status.
- Bathing Water Directive (2006/7/EC) addresses correctly the CSO problems by classifying the bathing areas affected by CSO as "subject to short-term pollution" and force authorities to take several management actions to tackle the problem. But this Directive is only addressed to bathing waters so it doesn't affect to all waters where CSO might impact.

At least, further guidance on waste water collection systems (and CSO in particular) would be useful to help Member States to develop their own guidelines in links with the objectives of the WFD.

Climate adaptation

5. Adapting to future climate change is a major challenge to many policy areas, including water policy. The Commission has outlined its views in a White Paper on Adaptation and in the Communication on Water Scarcity and Droughts. Some EU water policy was developed at a time when climate adaptation thinking was not so advanced. Do you think that the requirements of the following Directives can accommodate climate adaptation needs?

	Yes	No	Partially	Do not know
Water Framework Directive* (compulsory)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Floods Directive* (compulsory)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Nitrates Directive* (compulsory)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Urban Waste Water Treatment Directive* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please comment to explain any or all of your answers and, if possible, highlight any specific aspect of any Directive where you have concerns over its ability to accommodate climate adaptation needs.

(optional) (maximum 2000 characters; count: 0)

The EU should adopt a holistic approach to water scarcity, water stress and climate change combining EU-wide measures and local initiatives. This requires a three-stemmed approach

- Addressing current gaps and opportunities in water policy: fully integrate climate change adaption in RBMPs, better integration of water/energy/CAP, improved assessment and recognition of the financial aspects of policy delivery, etc;
- The hierarchy / local dimension of water issues: Flexibility is needed at the local level to manage water in a sustainable – economic, social, environmental - and efficient way according to specific needs. A restrictive EU hierarchy may thus not be appropriate.

- Eureau nevertheless welcomes the Commission's recognition that drinking water supply and the protection of the water systems must remain a priority
- Economic approach to water scarcity: It is important that water has a value and this should be distinguished from the value of the service that provides the water (for which the cost recovery principle, as per article 9 of the WFD, is key). In this context, EU policy should not hamper the development of new resources to secure a sustainable water supply across Europe

Subsidiarity

6. EU water law sets out a wide range of obligations on Member States. However, it does not address every issue or prescribe every detail of water management. For instance the Water Framework Directive establishes policy objectives but leaves it to the Member States to identify the implementing measures. Is the current water policy framework correct in its balance between obligations set out at EU level and Member State action on other issues?

* (compulsory)

- To a larger extent Yes
- To a larger extent No
- Other
- Do not know

Please comment to explain your answer and, if possible, indicate any specific issues which illustrate your views.

(optional) (maximum 2000 characters; count: 0)

The current policy framework, by and large, provides an adequate balance between obligations set out at EU level and Member States. This is particularly important as many decisions relating to water management are local decisions reflecting local socio-economic and environmental conditions. EUREAU strongly believes that the EU framework for the sustainable management of water must continue to recognize the local dimension of many water issues; it must leave sufficient latitude to implement solutions that make local sense from an economic and environmental standpoint. All our members insist on the peculiarity of their local situation in terms of water resources, be they Northern or Southern countries.

On the other hand, interpretation (and thus implementation) at the national and sub-national levels would be improved with targeted guidance. For instance, national/local arbitration should not lead to end-of-pipe solutions that would only address the manifestation of a water problem and not fix the problem at its root as this would defeat the purpose of the WFD.

Coherence of EU water law

7. Ideally, the different EU Directives should be consistent with each other with regard to objectives, timetables, implementation procedures, methodological standards, etc. For the Directives of the Fitness Check (Water Framework Directive, Nitrates Directive, Urban Waste Water Treatment Directive, Groundwater Directive, Floods Directive and the Directive on environmental quality standards in the field of water policy) do you consider that there are inconsistencies between them that have practical consequences for implementation?

* (compulsory)

- Significant inconsistencies
- Limited inconsistencies
- No inconsistencies with practical relevance

Where you consider there to be inconsistencies between any EU water Directives please explain.

(optional) (maximum 2000 characters; count: 0)

There are inconsistencies between some of the existing instruments such as, for example, **the WFD, the nitrates Directive and the groundwater objectives** which have a negative impact on the Drinking Water Directive. For instance: measures that feature in RBMPs are rarely directly addressing drinking and water protection issues. This coherence is also largely impacted by the fact that governance and administrative responsibility is often split in several ministries.

There are also inconsistencies between **WFD and Urban Waste Water Treatment Directive** in the sense that RBMPs consider waste water collecting system devices such as CSO only as a problem for the river quality despite the fact that they are necessary in a lot of cases to reach a high performance of the wastewater systems, particularly in case of heavy rain events (protection against urban floodings).

In the case of the Floods Directive, whilst EUREAU fully supports the main provisions of this text, EUREAU also believes that there is an urgent need for better co-ordination with land use planners, particularly in urban areas, to reduce the risk of surface water flooding where drainage systems are overwhelmed. EUREAU believes that sustainable storm water and flood control measures should be planned, designed and constructed upstream of the sewerage system to prevent and reduce the risks of hydraulic overload. The content of metals and PAH in storm waters can be reduced by simple local measures as well. EUREAU support the increased use of sustainable drainage and treatment systems.

EQS Directive and UWWT Directive: the EQS Directive will have consequences on urban waste water treatment plants. Implementation of the EQS Directive will cause a need to evaluate the requirements for treatment efficiencies in the waste water treatment plants, including cost-efficiencies of additional treatment. As this is actual issue in all countries, the need for additional treatment should not be question of national EQS Directive implementation: requirements on extra treatment steps for UWWTP's should be integrated in the UWWT directive. In case this is not done, there will be inconsistency between these two directives.

Coherence with other EU water law and policy

8. The Fitness Check addresses a range of EU water legislation and policy. However, some water protection measures are not included, yet there are a number of potential interactions between these Directives and those included in the Fitness Check. Do you consider that the Directives and policies included in the Fitness Check are consistent and coherent with the following other EU water protection Directives?

	Yes	No	Partially	Do not know
Bathing Water Directive* (compulsory)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Drinking Water Directive * (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Marine Strategy Framework	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Directive* (compulsory)

Please explain any or all of your answers (please be clear which Directives you are commenting on).
 (optional) (maximum 2000 characters; count: 0)
See above comment

Coherence with other EU environmental law and policy

9. Implementation of EU water policy contributes to the achievement of other EU environmental policy objectives (e.g. biodiversity protection). Implementation of EU water law may also be assisted by implementation of other environmental policies (e.g. on industrial emissions, environmental liability, etc). However, it is also possible that the objectives, obligations or procedures may not be coherent between EU water policy and other EU environmental policy. Do you consider that the following EU environmental policy areas are coherent with EU water policy?

	Yes	No	Could contribute more	Do not know
Environmental impact assessment policy (EIA and SEA Directives) * (compulsory)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Biodiversity policy (Birds and Habitats Directive and EU Biodiversity Strategy)* (compulsory)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pesticides Framework Directive * (compulsory)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Detergents Regulations* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Climate change mitigation policies* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Air protection policy* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Chemicals policy* (compulsory)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pharmaceutical policy* (compulsory)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Industrial pollution control policy (IPPC/IED)* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Waste policy* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Resource efficiency policy* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Policy on public participation and access to information* (compulsory)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental liability* (compulsory)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental crime* (compulsory)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
LIFE+ funding* (compulsory)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain any or all of your answers (please be clear which policies you are commenting on) and feel free to comment on any further area of EU environmental policy not included in the above list. Please also comment on how better integration of EU water policy with other environmental policies could be achieved.

(optional) (maximum 4000 characters; count: 0)

Coordination with other environmental policy is of course fundamental and must be improved if Europe is to reach its objectives. This can best be illustrated with the need to improve the control of

pollution at source and put a priority on limiting hazardous substances entering the (water) environment. This requires better coordination with REACH. Any substance identified as a priority substance under the WFD should be automatically listed for further authorizations and restrictions under REACH or other relevant legislation as pesticides, pharmaceuticals or biocides regulation. EUREAU calls for coherent and holistic legislation in that respect in the EU. For instance, there should be a dual control of the pollutants under the candidate list of the REACH regulation, and under the EC-working procedure of identifying a priority substance (PS) according to the WFD: any substance, dangerous enough to be identified as a Priority Substance subject to an Environmental Quality Standard (EQS) in surface water, must be restricted under REACH. In addition, the Directive on Priority Substances assumes that all needed measures are available by means of other legislation (e.g. REACH, pesticides and biocides legislation). This is not always the case as the different pieces of legislation are not always properly aligned; for instance, there is still no tool that deals with chemicals coming from pharmaceuticals intended for human consumption (in contrast with veterinary pharmaceuticals that may be prohibited by a member State on the basis of their potential environmental impact).

Coherence with waste and resources policy is also essential. Sewage sludge production is an unavoidable consequence of wastewater treatment, and is rising all over the EU. Sludge handling and treatment count as an important part of the total cost of wastewater treatment (capital and operational expenditures) in connection with both the Urban Wastewater Treatment Directive and the Water Framework Directive. And today sludge should not be seen only as a “consequence” but more as a “starting point” for producing innovative products or service. Sewage sludge is a source of nutrients (mainly phosphorus, nitrogen and organic matter), energy (through treatments as anaerobic digestion, or incineration with energy recovery), and even carbon for the production of innovative products such as bioplastics. EUREAU’s view is that sludge should be managed as a resource in line with current EU thinking embodied in various policies (the flagship initiative on the efficient use of resources, renewable energy, greenhouse gases reduction). It would help to remove some regulatory and non-regulatory barriers that exist in some countries.

Coherence with other EU law and policy

10. The implementation of EU policies other than those concerned directly with the environment and can contribute to delivering the objectives or EU water policy or can threaten those objectives. Do you consider that there is coherence between EU water policy and the following other areas of EU policy?

	Yes	No	Partially	Do not know
Agriculture policy (CAP)* (compulsory)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regional policy (Structural and Cohesion Funds)* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Energy policy (Renewable Energies, TEN-E etc) * (compulsory)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Transport policy* (compulsory)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Industry/enterprise policy* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Development policy* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Health protection policy* (compulsory)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Research and innovation policy* (compulsory)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please explain any or all of your answers (please be clear to which policy area you are referring to) and feel free to comment on any further area of EU policy not included in the above list. Please also comment on how better integration of EU water policy with sectoral policies could be achieved.

(optional) (maximum 4000 characters; count: 0)

Water resources protection should be integrated across the board, in EU water policy but also other policies fields such as chemicals policy or agricultural policy:

- **The Common Agricultural Policy (CAP):** the CAP reform should result in much better alignment with the objectives of the WFD. Diffuse pollution from agriculture is still the most important pollutant of European water resources. This has a direct effect on the environment and the ecosystems and also on the need for treatment for the production of drinking water, increasing the drinking water price for consumers. Many measures, which are easy to implement, exist and can have significant positive effects on water quality. With regard to water quantity, over extraction of water for irrigation purposes need to be tackled, for example by innovation in irrigation techniques, water management measures or water reuse. Water scarcity as a result of irrigation may never lead to the lack of available water for the production of drinking water. At the same time, lower water levels will also have a negative effect on water quality, as a result of less dilution of polluting substances. EUREAU strongly supports the approach of commissioner Ciolos for a “greening” of the 1st pillar and believes that “greening” should incorporate “blueing” with measures to be taken by farmers in their daily routines in order to protect water resources and the environment and the ecosystems from negative impacts (nitrate surpluses, pesticides, drift, run-off, etc.). With regards to 2nd pillar financial support, EUREAU proposes to include areas which put restrictions to agricultural activities such as drinking water protection areas, retention areas for flood risks or nature development / biodiversity to the areas that are entitled for compensation for natural constraints (handicapped areas).
- **Cohesion policy** also plays a fundamental role in the implementation of EU water policy such as the UWWT Directive and the WFD. It is fundamental for water to be fully integrated in the proposal for the 2014-2020 financing period. And whilst at present cohesion policy focused on the financing of urban wastewater infrastructure and drinking water infrastructure, a broader approach should be encourage, in line with the requirements of the WFD and the objective of reaching good ecological status in 2015 (e.g. protection of drinking water catchments, etc).
- **WFD and EQS** measures are driving for new additional water protection measures. There is no comprehensive evaluation which would display impacts of proposed measures to the Energy policies. These interests are many times controversial and energy aspect is not seriously considered. Sewage sludge is valuable source of energy and could be better utilized. Additional information is provided in the answer at section 20.

Efficiency and effectiveness

Common Implementation Strategy

11. The Common Implementation Strategy (CIS) has supported the implementation of the Water Framework Directive and other EU water policy. It has worked through expert and working groups, *inter alia*, to develop guidance to support many different aspects of practical implementation of EU water policy in the Member States. Do you consider that:

The CIS process has addressed the right issues? * (compulsory)	Yes
The guidance produced has proved helpful in practical implementation of EU water policy? * (compulsory)	Partially
The CIS working methods have been well structured? * (compulsory)	Yes

Please explain any or all of your answers (please be clear to which issue you are referring to) and feel free to comment on any changes to the CIS process that could make it more relevant or efficient.

(optional) (maximum 4000 characters; count: 0)

No comment

Administrative co-ordination

12. The Water Framework Directive encourages integrated management of river basins including administrative co-ordination as a necessary condition to achieve water management objectives. Do you consider that there is effective co-ordination of administration for the achievement of water management objectives in the following cases in your experience?

Between national public authorities within a Member State (e.g. between national Ministries) * (compulsory)	Improvement needed
Between the river basin authorities and other regional public authorities * (compulsory)	Improvement needed
Public authorities within a river basin in a Member State * (compulsory)	Improvement needed
Between national and river basin authorities* (compulsory)	Improvement needed
Among river basin authorities in a river basin across national frontiers * (compulsory)	Yes
Between water management authorities and other public authorities for environmental protection * (compulsory)	Improvement needed
Between water management authorities and other public authorities for spatial planning * (compulsory)	Improvement needed
Between water management authorities and Stakeholders * (compulsory)	Improvement needed

Please explain any or all of your answers (please be clear which subjects you are commenting on).

* (compulsory) (maximum 2000 characters; count: 0)

Whilst the coordination at the basin level is most often adequate, problems often exist at the national level, between ministries that have different responsibilities. One practical consequence of that is that water problems are not systematically identified and solved at their source. There is a need to improve the coherence between the assessment of problems and the remediation measures that are put into place. It is highly desirable to solve conflicts between water and other policies that are fundamental to achieving EU water policy objectives (agriculture, biodiversity, etc). Furthermore, solutions should be devised by involving relevant stakeholders at the relevant local echelon.

Although the WFD stimulated a consultative process at all levels, there is a general impression that water utilities are not sufficiently involved in the preparation and realization of the RBMP and associated decision-making process.

Planning

13. Directives contain obligations for Member States to develop and implement plans to deliver the implementation of practical measures. For the following Directives do you consider the planning obligations to be clear and achievable?

	Yes	No	Partially	Do not know
Water Framework Directive* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Nitrates Directive* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Urban Waste Water Treatment Directive* (compulsory)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Floods Directive* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please comment to explain any or all of your answers and make any recommendations you consider would improve the planning obligations (please be clear which policies you are commenting on).

(optional) (maximum 3000 characters; count: 0)

The adequate development and implementation of plans play a fundamental role in the achievement of EU policy objectives. The assessment of these plans by the European Commission form an important step in this process. This is particularly relevant for the RBMPs which were submitted by the Member States to the EC and are currently being evaluated. Eureau believes that the analysis of the measures proposed in the RBMPs should be undertaken with particular scrutiny of certain points:

- All measures proposed should focus strictly on solving problems at their root. In this spirit, national/regional or local arbitration should avoid leading to end-of-pipe solutions as it does not address the problem (which in itself is not in line with the spirit of the WFD)
- Measures ought to be developed on the basis of sustainability and cost-optimisation. Thus appropriate cost-benefit analysis must be carried out in a holistic manner, and in particular with regards to those measures aiming to address alternative solutions to water stress
- The control of pollution at source must be an underlying principle. Drinking water sources must systematically benefit from protection measures that reduce the level of treatment required. RBMPs should therefore identify drinking water protected areas which should be subject to specific objectives for groundwater and surface water catchments.
- Diffuse pollution remains a major source of water pollution. EUREAU believes that domestic consumption should not be penalized by costs linked to the remediation of such pollutions. The polluter pays principle is therefore a key requirement of the WFD which must be adequately reflected in RBMPs
- RBMPs should include economic analysis of water services so as to introduce adequate pricing policy.

Public participation

14. EU water Directives contain different requirements for public access to information and participation in decision making. Guidance also encourages more active public participation than

the legal minimum. Your organisation may have been responsible for ensuring public participation or have taken part in the participation process. Please answer the following:

Are the requirements in EU Directives a sufficient legal basis for public participation in water management? <i>* (compulsory)</i>	Yes
Do you consider that the process of public consultation has effectively provided for a possibility to influence water management in your river basin/country? <i>* (compulsory)</i>	Partially
Do you consider public participation in water management in your river basin/country to be sufficient? <i>* (compulsory)</i>	No
Are there permanent structures for continuous involvement of stakeholders in your basin/for your sector? <i>* (compulsory)</i>	Partially
Is current guidance sufficient to promote active participation? <i>* (compulsory)</i>	Partially

Please comment to explain any or all of your answers and make any recommendations you consider would improve public participation.

(optional) (maximum 2000 characters; count: 0)

No comment as it varies significantly from one country/region/basin to another

Monitoring obligations

15. Directives contain obligations for Member States to monitor the various pressures and impacts acting on surface water and groundwater bodies. For the following Directives do you consider the monitoring obligations to be targeted at the right issues?

	Yes	No	Partially	Do not know
Water Framework Directive <i>* (compulsory)</i>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Groundwater Directive <i>* (compulsory)</i>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Directive on environmental quality standards in the field of water policy <i>* (compulsory)</i>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Nitrates Directive <i>* (compulsory)</i>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Urban Waste Water Treatment Directive <i>* (compulsory)</i>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Floods Directive <i>* (compulsory)</i>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please comment to explain any or all of your answers and make any recommendations you consider would improve the monitoring obligations.

(optional) (maximum 2000 characters; count: 0)

No comments

Reporting obligations

16. Directives contain obligations for Member States to report to the European Commission on various aspects of their implementation. For the following Directives do you consider that the

information that is reported adds value to understanding the challenges facing Europe's waters and/or how well EU water policy is implemented?

	Yes	No	Partially	Do not know
Water Framework Directive* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Groundwater Directive* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Directive on environmental quality standards in the field of water policy* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Nitrates Directive* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Urban Waste Water Treatment Directive* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Floods Directive* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Please comment to explain any or all of your answers (please be clear which policies you are commenting on) and make any recommendations you consider would add value to the reporting undertaken by Member States.

(optional) (maximum 3000 characters; count: 0)

No comment

Obligations in EU water policy

17. Many Directives contain obligations to control specific pressures on water bodies in order to achieve the objectives of that Directive with regard to water protection. Do you consider that the obligations under the following Directives are sufficient, insufficient or excessive in order to meet the objectives of those Directives?

	Sufficient	Insufficient	Too excessive	Do not know
Water Framework Directive* (compulsory)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Groundwater Directive* (compulsory)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Directive on environmental quality standards in the field of water policy* (compulsory)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Nitrates Directive* (compulsory)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Urban Waste Water Treatment Directive* (compulsory)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Floods Directive* (compulsory)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please comment to explain any or all of your answers (please be clear to which Directive you are referring to), in particular providing any evidence for your answers.

(optional) (maximum 3000 characters; count: 0)

For some of the substances on the new list of candidate priority substances (the estrogens and pharmaceuticals) the environmental aspects as well as treatment technology are still under investigation; the impact assessments are too vague. We acknowledge that monitoring of these substances is essential but putting them on the list with very low EQS (below detection limits) may lead to expensive end-of-pipe solutions, since the idea of source control and restricted use will be difficult to apply to these substances.

Costs and administrative burdens

18. The implementation of the water Directives has costs to public administrations, businesses and others. However, improved water conditions produces benefits to the public, businesses and the wider environment. Do you consider that the costs associated with the implementation of the following Directives are lower, of a similar proportion or higher than the benefits they provide?

	Lower	Similar proportion	Higher	Do not know
Water Framework Directive * (compulsory)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Groundwater Directive* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Directive on environmental quality standards in the field of water policy* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Nitrates Directive* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Urban Waste Water Treatment Directive* (compulsory)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Floods Directive* (compulsory)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please comment to explain any or all of your answers and in particular highlight any specific obligations in a Directive where you may have concerns.

(optional) (maximum 3000 characters; count: 0)

The EQS Directive has consequences on the urban waste water treatment plants. Implementation of the EQS Directive will cause a need to evaluate possible requirements for additional treatment steps in waste water treatment plants. Technologies for removal of hazardous substances are known to be very expensive as well as energy intensive. In case proper analyses of costs/benefits and disadvantages of additional treatment in different circumstances as well as other possible measures is not done, there is threat that implementation of this directive will be extremely costly but benefits to the water environment will be minor.

Implementing EU water law

19. Implementing EU water law has many potential challenges in Member States. From your particular perspective, which of the following has been a specific challenge or constraint for effective implementation (note that any concerns arising from the obligations in the Directives themselves should be considered in the previous questions)?

Objectives of EU water policy not properly formulated* (compulsory)	No
Poor transposition into Member State law* (compulsory)	Yes
Lack of political will in the Member States* (compulsory)	Yes
Lack of integration of water policy objectives in other policy areas* (compulsory)	Yes
Lack of (or late) establishment of river basin authorities* (compulsory)	Partially
Lack of legal status of River Basin Management Plans* (compulsory)	No
Insufficient ability to control water demands* (compulsory)	No

Too many bodies involved in water decision making* (compulsory)	Partially
Poor co-ordination between river basin and national bodies* (compulsory)	Partially
Poor coordination with other authorities (spatial planning, agriculture, economic planning, etc)* (compulsory)	Yes
Poor co-ordination between authorities across national frontiers* (compulsory)	Partially
Lack of capacity in relevant public bodies* (compulsory)	No
Insufficient guidance to public bodies* (compulsory)	Partially
Poor stakeholder consultation* (compulsory)	No
Lack of political support* (compulsory)	Partially
Lack of support from some key stakeholders* (compulsory)	No
Strong resistance from some key stakeholders* (compulsory)	Yes
Insufficient finance* (compulsory)	Partially
Lack of sufficient understanding on pressures and impacts on water* (compulsory)	No

Please comment to explain any or all of your answers (please be clear as to which issue you are referring to) and in particular provide practical examples which you consider to be relevant.

(optional) (maximum 3000 characters; count: 0)

There is a need to improve the study and assessment potential measures and their impacts more thoroughly, with a view to obtain a detailed and thorough understanding on those potential measures and their impacts before decision making. For instance, in relation to Directive 91/271/EC, what is the impact of other sources than households? With regards to sludge, what about POPs? In these areas, there is a need for risk/impact assessments and high level research. That is especially the case in smaller member States.


Way forward

Addressing issues in EU water policy

20. If you have identified issues, problems or gaps in any part of EU freshwater policy, different types of measures might be considered to be appropriate to address those problems. These could include:

- Amending law or developing new law
- Developing new or improved guidance
- The Member States to reinforce their implementation of the current policy
- The Commission to take a stronger focus on enforcement of Member State obligations
- The Commission to take a stronger focus on coordination of different stakeholders
- More or better targeted EU funding
- Other

For any specific problem(s) concerning the effective achievement of the objectives of EU water policy (please specify what these are), please comment on which measure(s) you consider might be appropriate to address those problems.

 (optional) (maximum 8000 characters; count: 0)

EUREAU welcomes the Commission's initiative to undertake the Fitness Check with a view to adopt the Blueprint in 2012. EUREAU believe that it is an opportunity to address a number of topic that need to be addressed at the EU level: 1. Reuse and recycling, 2. Sludge, 3. CAP and agriculture, 4. Control at source and protection of drinking water and surface water, 5. Leakage reduction in the context of water scarcity and drought and 6. Urban water collection systems

1. Reuse and recycling

Water recycling and reuse should be an integral part of sustainable management of resources and can contribute to achieving "good ecological status". EU guidance is needed though to give confidence to suppliers and users in applying water recycling techniques ranging from aquifer recharge to agricultural irrigation. Water reuse and alternative resources in a domestic context may also contribute to sustainable water management. However, it also involves risks, especially health risks that need to be suitably controlled and mitigated. Indeed, so-called "closed loops" endanger safe drinking water supply and must be avoided. This must always be evaluated on a site/use-specific basis, including from environmental and economics points of view. The management of these risks necessitates comprehensive management systems, standards and inspections. Responsibilities for supply and use of alternative water at home also have to be addressed. These responsibilities rest with the Health Authorities and Health Regulators. Agricultural irrigation is the largest user of recycled water. Although already practiced across Northern and Southern Europe, EUREAU believes that there may be a case for developing EU-wide guidance and standards for irrigation based on scientific evidence as water recycling is currently hampered by the unclear and inconsistent legislative framework. Proper EU guidance that would focus on making recycled water fit for purpose would give both users and suppliers' confidence in applying such techniques. Such guidelines should recognize water reuse/recycling as good practice in river basin management planning to increase water availability. In reviewing river basin management plans, the EC ought to critically assess the implementation of water recycling particularly in water scarce regions.

2. Sewage sludge

Sewage sludge is source of nutrients (phosphorus, nitrogen and organic matter) as well as energy or even materials after ad-hoc treatments (anaerobic digestion, incineration, biotechnology, etc.). Sludge management should therefore feature appropriately on the sustainable use of resources agenda and has to be promoted by the new fertiliser legislation (both sludge and biowaste). Today, sewage sludge production is a positive consequence of improving wastewater treatment. With regards to organic recovery, the current sludge directive (86/278/CEE) has proven its effectiveness as a guide to improve sludge quality and sludge end users confidence; nevertheless, this directive is outdated and its review has unfortunately been postponed so that a clear legal tool to support sludge organic recovery is missing. In the meantime, the EC announced a recast of the landfill directive, with a phase-out of landfilling of biodegradable wastes (including sludge) by 2020-2025. EUREAU is concerned that, for different reasons (social acceptability, costs, legal constraints), each major route for sludge handling (organic recovery, incineration, landfilling) will become more and more complex to deal with. This will lead to problems all over Europe, and especially for small and medium size WWTP, for which some routes for sludge management become an economic threat (unsustainable costs due to the lack of economies of scale or because of characteristics of the sludge) that cannot be implemented in practice (e.g. incineration).

The current sludge directive has arisen after an efficient and important work carried out by scientists and supported by the EC through a COST program. Today, a lot more data could be used to develop risk management scenarios (with derived sludge quality criteria) and optimised LCA-based approaches. In a context of increasing complexity, the EC should take the time to launch an ambitious scientific program, delivering in the middle-term a truly scientifically based framework.

3. CAP and agriculture

The CAP could have a major impact on sustainability issues related to water. The reform of the CAP provides a major opportunity to adequately integrate the water-related issues. Some of EUREAU's proposal are:

- With a view to maintaining a strong 1st pillar, decrease the amount of current income support (with application of cross compliance) and top up the income support to current levels through direct payments for above-legal requirement measures to produce public goods (i.e. for water management issues). Delivering these measures should be a condition for farmers to receive the basic payments. Greening measures within the cap must address water.
- Pillar II payments should remain, financed through the CAP budget with Member State co-financing, to support regions with natural impediments. They should not focus on generic measures but should be targeted at measures aimed at specific local or regional circumstances. Local/regional areas should be able to be designated to perform special functions, such as groundwater protection, drinking water extraction or combating water scarcity.
- EUREAU supports innovation in technologies that would be water efficient. Pillar II offers already opportunities to fund such new technologies; EUREAU believes that Pillar I also should present such funding opportunities.

4. Control at source and protection of drinking water and surface water

Control at source should be the priority measure in limiting hazardous substances entering the environment. Substance identified as a priority substance under the WFD should be automatically listed for further authorisations and restrictions under REACH or other relevant legislation such as pesticides or biocides regulations. The Polluter pays principle, an underlying principle of the WFD, is logically followed when actions are targeted to the original source of pollution. EUREAU believes that there are a lot of possibilities for new EU-wide source control measures and effort is needed to identify the sources, consider potential measures and implement them. New regulations to control hazardous substances at source should be implemented at the European level to produce common environmental benefits and avoid market distortion which may be a result of different legislations.

An EU-directive on import and trade of textiles might be another way forward to combat such priority substances at source that are released mainly from textiles being washed. Such a directive would be an alternative to regulate the same substances under Reach.

Similarly, drinking water resources and the water systems must be protected from diffuse pollution such as agriculture. This can only be addressed in conjunction with relevant policies (the reform of the CAP). However, the water regulatory framework must also be adapted. For instance, as long as nitrates compounds are applied on EU agricultural land as per ongoing trends, it is likely that farming will carry on having an impact on drinking water resources in most of the EU. RBMPs should identify Drinking Water Protected Areas which should be subject to specific objectives for groundwater and surface water catchments.

REGULATION (EC) No 1107/2009 concerning the placing of plant protection products on the market
The European placing on the market system of plant protection products should be in line with the WFD. This means that the standards from the EU admission policy (with recovery times) should conciliated with the standards from the WFD (no recovery times)

5. Leakage reduction in the context of water scarcity and drought

EUREAU members are committed to do their fair share of the EU environmental action plan and to demonstrate continuous improvement of water supply integrity to meet customers' demands. In dealing with the WFD and more precisely with the issue of water scarcity & drought, we appreciate that the EU has recognized that priority should be given to the provision of drinking water to all EU

citizens. In application of this principle, EUREAU understands that water supply planning impacts the long term and must not result in an imbalance between supply and demand, nor in unaffordable water prices. In this context leakage reduction is one of a suite of policy tools available. Leakage reduction should be assessed locally and based on sound assessments taking full account of economic, social and environmental externalities. In this context, whilst it must constitute a water management priority at the local level, any one size-fits-all solution should be avoided. Likewise, any targets should be decided at the local level, and be debated upon in terms of lost volume reduction.

6. Urban water collection system is the first step of a good protection of the aquatic environment from urban pollution and is not conveniently addressed by current legislation and, as such, a further guidance on urban water collection systems (and CSO in particular) would be useful to help Member States to develop their own guidelines in links with the objectives of the WFD.
