

# Public Consultation On the Review of Annexes I and II of the Groundwater Directive

<b>A. Introductory Questions</b>	
1. Please indicate your name (i.e. the name of the person submitting the response). <i>[Format: title; first name; last name]</i> -open reply-( <b>compulsory</b> )	Carla Chiaretti, EUREAU Policy Officer
1a. Are you responding to this consultation as an individual or on behalf of an organisation or public authority? (Please choose <b>one</b> response) -single choice reply-( <b>compulsory</b> )	On behalf of an organisation
1a.ii. What type of organisation do you represent? (Please choose <b>one</b> response) -single choice reply-( <b>compulsory</b> )	Business / industry (including enterprises and business associations)
1a.iii. Please indicate the full name of your organisation. -open reply-( <b>compulsory</b> )	EUREAU - European Federation of National Associations of Water Services
1a.iv. Please provide your Register ID <i>if applicable</i> . -open reply-( <b>optional</b> )	39299129772-62
1b. Please indicate the country where you or, if applicable, your organisation or public authority is located. -single choice reply-( <b>compulsory</b> )	Belgium
2. Unless you specify otherwise, your contribution may be published under your name or, if you are responding on behalf of an organisation or public authority, the name of the organisation or authority, on the Commission's website. Please indicate here if you wish your contribution to be anonymous. (For full information please refer to the Specific Privacy Statement point 3) -single choice reply-( <b>compulsory</b> )	You may identify the author/source of this contribution when publishing it
<b>B. Main challenges to address in the review of Annexes I and II of the Directive</b>	
3. Do these four main challenges cover the most important issues for the review of Annexes I and II of the GWD? -single choice reply-( <b>compulsory</b> )	Yes
4. Should any other challenges be considered? If so, which and why? Do you have any other comments on the list of four main challenges. -open reply-( <b>optional</b> )	
<b>C. List of substances: pollutants regulated in Annex I of the Directive</b>	
5. Should any of the naturally occurring or synthetic substances on Part B of Annex II be moved to the list in Annex I? (Please choose	Don't know

<b>one</b> response) -single choice reply-( <b>compulsory</b> )	
6. Apart from the substances in Part B of Annex II, should any other substances be added to the list in Annex I? -single choice reply-( <b>compulsory</b> )	Don't know
7. Do you have any further comments regarding the review of Annex I? -open reply-( <b>optional</b> )	In order to better protect groundwater, EUREAU calls on: a. Member States to apply and enforce correctly the Pesticides Regulation (Regulation EC 1107/2009) b. The European Commission to review the obsolete Nitrates Directive (Directive 91/676/EEC). In this respect EUREAU welcomes the adoption of the 7th Environmental Action Programme and the acknowledgment by legislators of the need of a legal framework to improve the protection of soil.

## D. List of substances: pollutants and indicators regulated in Part B of Annex II

8. As noted in the background paper, only the substances/parameters currently listed in Annex I and Annex II Part B have been identified, according to the latest information from Member States, as being of Europe-wide concern. If you have new information concerning substances that should be identified as being of Europe-wide concern which would justify listing them in Annex II Part B, please specify these substances and provide the information you consider would justify their inclusion in Annex II Part B. If you do not think substances should be added, please write "None". -open reply-( <b>compulsory</b> )	None
9. Should any other changes be made to the list of pollutants in Annex II Part B? -single choice reply-( <b>compulsory</b> )	Don't know

## E. Threshold values (Annex II Part A)

10. Should Annex II provide further specifications regarding NBLs and the relationship between TVs and NBLs in order to make TVs more comparable across Member States? (Please choose <b>one</b> or <b>more</b> responses) -multiple choices reply-( <b>compulsory</b> )	Don't know
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## F1. Clarifying reporting requirements

11. Should there be an obligation for Member States to provide (where relevant but otherwise unconditionally) the following information listed in Part C of Annex II? (Please choose <b>one</b> response) -single choice reply-( <b>compulsory</b> )	Yes, all elements listed in Part C (a) to (d)
11b. Please describe the reasons for your	Good reporting ensures transparency

choice. -open reply-(optional)	
11c. Please provide any information or expert judgement regarding the feasibility, costs and benefits of the options. -open reply-(optional)	
<b>F2. Reporting on groundwater bodies at risk</b>	
12. Should Part C of Annex II incorporate these specifications in the mandatory reporting requirements for groundwater bodies at risk? (Please choose <b>one</b> response) -single choice reply-(compulsory)	Don't know
<b>F3. Reporting on methodology for deriving NBLs</b>	
13. Should Part C of Annex II include an obligation to report the methodology for deriving NBLs? (Please choose <b>one</b> response) -single choice reply-(compulsory)	Don't know
<b>F4. Reporting on reasons for not establishing TVs</b>	
14. In several cases, Member States have not specified TVs for all pollutants and indicators listed in Part B of Annex II. Should Part C of Annex II include an obligation to report the reasons for not establishing TVs? (Please choose <b>one</b> response) -single choice reply-(compulsory)	Yes
14a. Please describe the reasons for your choice. -open reply-(optional)	Good reporting ensures transparency
14b. Please provide any information or expert judgement regarding the feasibility, costs and benefits of the options. -open reply-(optional)	
<b>F5. Reporting on the compliance regime</b>	
15. Should Part C of Annex II include an obligation to report certain elements of the compliance regime? (Please choose <b>one or more</b> responses) -multiple choices reply-(compulsory)	Don't know
16. Should any other changes be made to the list of information subject to mandatory reporting? If so, please specify. -open reply-(optional)	
<b>G1. Mechanism for gathering monitoring data</b>	

<p>17. Should a mechanism for systematic gathering of monitoring data on groundwater contaminants of concern, including emerging contaminants, be established at EU level and should these data be reported to an EU-wide chemical monitoring database? (Please choose <b>one</b> response)</p> <p>-single choice reply-(<b>compulsory</b>)</p>	<p>Don't know</p>
<h2>G2. Further provisions for substances and pollutants of concern</h2>	
<p>18. Should Annex II specify the mandatory establishment of TVs for and/or monitoring of all pollutants and indicators listed in Annex II Part B? (Please choose <b>one</b> response)</p> <p>-single choice reply-(<b>compulsory</b>)</p>	<p>Don't know</p>
<p>19. Do you have any further comments regarding provisions in Annexes I and II of the GWD to address substances and pollutants of concern, including emerging contaminants?</p> <p>-open reply-(<b>optional</b>)</p>	
<h2>H. Further comments and follow-up</h2>	
<p>20. Do you have any further comments regarding the review of Annexes I and II of the GWD?</p> <p>-open reply-(<b>optional</b>)</p>	<p>EUREAU wishes an improved integration of water legislation. To this end a better link must be established between the Drinking Water Directive and the GWD. The link between the GWD and paragraphs 2 and 3 of Art.7of the WFD should be revitalised. EUREAU believes that further guidance at EU level is needed on the protection of groundwater bodies used or suitable to use for the supply of drinking water: in this respect the update of the WFD CIS Guidance document on Groundwater in Drinking Water Protected Areas (Document Nr 16) is a priority</p>
<p>21. We may wish to contact some respondents by email or telephone for further information, in particular regarding information and expert judgement on the feasibility, costs and benefits of the options. If you are available for follow-up, please provide your email address and/or telephone number.</p> <p>-open reply-(<b>optional</b>)</p>	<p>carla.chiaretti@eureau.org</p>