

Public consultation on policy options to optimise water reuse in the EU

1. Information about you	
1.1 Your full name and your email address: -open reply-(optional)	Bertrand Vallet bertrand.vallet@eureau.org
Do you wish your contribution to be made public? -single choice reply-(compulsory)	Yes
1.2 You are replying as a(n): -single choice reply-(compulsory)	Stakeholder/expert
You are representing: -single choice reply-(compulsory)	Industrial or trade association
If responding on behalf of a(n) organisation/association/authority/company/body, please provide the name: -open reply-(optional)	EurEau
If responding on behalf of a(n) organisation/association/authority/company/body, please provide its main sector(s) / field(s) of activity: -multiple choices reply-(optional)	Sanitation - Drinking water
1.3 Your country/ies: -single choice reply-(compulsory)	EU level organisation
1.4 Do you live in an urbanised or a rural area? -single choice reply-(optional)	Don't know/Not applicable
1.5 Are you aware of water reuse practice in your neighbourhood? -single choice reply-(optional)	
1.6 Are you aware of droughts or water scarcity occurring in the area where you live in the past five years? Drought refers to a temporary decrease in water availability, for example when it does not rain over a long period of time. Water scarcity occurs when demand for water exceeds the available sustainable resources. Water scarcity situations are not only limited to the southern, drier regions but can occur also in areas in the northern river basins of Europe. -single choice reply-(optional)	

2. Your perception of the benefits of and barriers to water reuse

<p>2.1 Which uses of treated water do you think are appropriate and should be encouraged, considering that the level of treatment of the water is adjusted in order to meet the quality requirements of the intended uses (several answers possible):</p> <p>-multiple choices reply-(compulsory)</p>	<p>Irrigation of urban green spaces - Irrigation of fruits and vegetables to be processed - Street cleaning - Irrigation of cotton and other crops used for clothing products - Fire fighting - Irrigation of non-food crops (e.g. animal feed crops, energy crops, etc.) and tree plantations - Cooling (in energy production / industry) - Irrigation of golf courses and other sport fields - Groundwater recharge - Other industry - Bathing waters - Other - Irrigation of fruits and vegetables to be eaten raw - Food industry with no food contact</p>
<p>Please specify: -open reply-(compulsory)</p>	<p>In view of the extent of de facto indirect reuse (by using surface water which has received considerable amounts of treated wastewater for drinking water production) we consider planned indirect potable reuse (IPR) through e.g. managed aquifer recharge a suitable application. To our understanding the scope of the impact assessment should be restricted to the use of treated municipal wastewater and industrial wastewater in other sectors / outside the treatment facilities. The on-site recycling of industrial wastewater streams to increase water efficiency in industrial production is not subject to this IA but should be subject to other ambitions (e.g. BREFs). Further, reuse of industrial water would be mostly applicable in an industrial context. Comment on irrigation: It is important to note that different irrigation applications will require adequate water qualities and risk management concepts to ensure the safety of the food produced.</p>
<p>Reduced water scarcity</p> <p>-single choice reply-(compulsory)</p>	<p>High</p>
<p>Reduced pollution discharge from urban waste water treatment plants into rivers</p> <p>-single choice reply-(compulsory)</p>	<p>Medium</p>
<p>Improved resilience/adaptation to climate change</p> <p>-single choice reply-(compulsory)</p>	<p>High</p>
<p>Energy and carbon savings</p> <p>-single choice reply-(compulsory)</p>	<p>Low</p>
<p>Increased resource efficiency (nutrients recycling)</p> <p>-single choice reply-(compulsory)</p>	<p>High</p>
<p>Contribution to soil fertilisation</p> <p>-single choice reply-(compulsory)</p>	<p>Medium</p>
<p>Cost savings for public authorities</p> <p>-single choice reply-(compulsory)</p>	<p>Medium</p>
<p>Cost savings for water users</p> <p>-single choice reply-(compulsory)</p>	<p>Medium</p>
<p>Increased revenues for the agricultural sector (due to higher water availability and productivity)</p> <p>-single choice reply-(compulsory)</p>	<p>Medium</p>
<p>Increased revenues for the tourism sector (due to</p>	<p>High</p>

higher water availability) -single choice reply-(compulsory)	
Innovation potential in the water industry -single choice reply-(compulsory)	High
Job creation -single choice reply-(compulsory)	Medium
If you identify other important benefits, please specify them: -open reply-(optional)	1. Increased food self-sufficiency in water scarce areas - 2. Comment on job creation: it is difficult to really quantify the impact on job creation. It will certainly have an impact on at least two fields: technology development and increase of industrial activities where water recycling could stabilize the activity (paper industry...)
Too high cost of reused water -single choice reply-(compulsory)	High
Too low price of freshwater water -single choice reply-(compulsory)	High
Insufficient control on (freshwater) water abstractions -single choice reply-(compulsory)	High
Lack of awareness on the multiple benefits of water reuse -single choice reply-(compulsory)	High
Water reuse not seen as a component of integrated water management (e.g. in scarce areas no incentives to water reuse in place) -single choice reply-(compulsory)	High
Fear of potential trade barriers for food products -single choice reply-(compulsory)	I don't know
Negative public perception on the quality of reused water -single choice reply-(compulsory)	Medium
Lack of clarity in the regulatory framework to manage risks associated with water reuse -single choice reply-(compulsory)	High
Too stringent national water reuse standards -single choice reply-(compulsory)	Medium
Technical barriers and scientific uncertainties -single choice reply-(compulsory)	Medium
If you identify other important barriers, please specify them: -open reply-(optional)	Financing (upfront invest) and economic evaluation of benefits, cost-recovery (also for external benefits) Institutional settings and framework Unclear responsibilities and liabilities Comments: Regarding the fear of potential trade barriers for food products, as European federation of water services, we are not considering ourself competent to judge the impact on trade of food products. Agricultural, trade and consumer organisation might have a more informed opinion on this. We also want to stress that the importance/extent of the above main barriers are highly variable across Europe.
3. Your opinion on possible EU measures	
1. <u>Maintaining status quo</u> : No new EU measure	Not effective at all

-single choice reply-(compulsory)	
2. <u>Optimising status quo</u> : Increased enforcement of Water Framework Directive requirements on water pricing & freshwater abstraction control, integrated water management and better governance -single choice reply-(compulsory)	Effective
3.1 <u>Non regulatory measure</u> : Develop non-binding EU guidelines on how to foster water reuse -single choice reply-(compulsory)	Effective
3.2 <u>Non regulatory measure</u> : Promotion of forthcoming ISO/CEN water reuse standards as a common reference for the management of health and environmental risks to be used by Member States -single choice reply-(compulsory)	Effective
3.3 <u>Non regulatory measure</u> : Awareness raising and dissemination of information on the various benefits of water reuse, among all key stakeholders/consumers -single choice reply-(compulsory)	Slightly effective
3.4 <u>Non regulatory measure</u> : Non-binding guidance on the implementation of the Water Framework Directive and Urban Waste Water Treatment Directive (e.g.: clarify provisions of the Urban Waste Water Treatment Directive on water reuse; give priority to water reuse among alternative water supply options; encourage water stressed Member States to set targets for water reuse) -single choice reply-(compulsory)	Effective
4.1 <u>Regulatory measure</u> : Legally binding framework to require that MS in water stressed river basins assess the contribution of water reuse and, when relevant, set targets for it, while managing health and environmental risks -single choice reply-(compulsory)	Effective
4.2 <u>Regulatory measure</u> : Legally binding minimum standards on water reuse at EU level -single choice reply-(compulsory)	Effective
If you think other EU measures would be relevant in order to promote water reuse, please specify them: -open reply-(optional)	The promotion of water reuse should not exclusively be driven by its cost-effectiveness but consider other drivers, too (i.e. social and environmental benefits). Funding and financing mechanism and programmes should also be considered as supportive measures in order to help Member States to implement water reuse solutions.
Do you consider that a combination of different measures would be necessary to promote water reuse ? -single choice reply-(compulsory)	Yes
Please specify which measures should be combined: -open reply-(compulsory)	All measures listed (except option 1) are deemed to have a positive effect Particularly measures ranked "b" should be combined in a coordinated way combining mandatory elements, supportive guidance and incentives
1. <u>Maintaining status quo</u> : No new EU measure	Slightly effective

-single choice reply-(compulsory)	
2. <u>Non regulatory measure</u> : Promotion of forthcoming ISO/CEN water reuse standards as a common referential for the management of health and environmental risks to be used by the Member States -single choice reply-(compulsory)	Effective
3. <u>Regulatory measure</u> : Legally binding minimum standards on water reuse at the EU level addressing health and environmental risks -single choice reply-(compulsory)	Very effective
If you think other EU policy measures would be relevant in order to ensure the safety of water reuse practices, please specify them: -open reply-(optional)	Consider cross-sectorial measures (agriculture, industry, environmental)
Do you consider that a combination of different measures would be necessary to ensure the safety of water reuse practices ? -single choice reply-(compulsory)	No
3.3.1 <u>Maintaining status quo</u> : no EU measure - Pros and Cons -open reply-(optional)	Pros: no EU measure – no costs; Cons: no water reuse development expected at EU level, continuing unmanaged water reuse
3.3.1 <u>Maintaining status quo</u> : no EU measure - Benefits/Costs (in monetary terms) -open reply-(optional)	No implementation costs but additional cost for alternative climate change adaptation measures. Additional costs incurred, as benefits of water reuse will not be utilised, missed opportunities
3.3.2 <u>Optimising status quo</u> : Increase enforcement of WFD requirements concerning water pricing and freshwater abstraction control, integrated water management and better governance - Pros and Cons -open reply-(optional)	Pro: consensus among MS likely, some mandatory reporting obligations on water reuse practices could be added easily in RBMP and PoM. Fully implementing the WFD will facilitate water reuse. - Cons: it might not be sufficient (rather voluntary measure relying on initiatives of MS and control by DG ENV), water pricing issue is critical and debated.
3.3.2 <u>Optimising status quo</u> : Increase enforcement of WFD requirements concerning water pricing and freshwater abstraction control, integrated water management and better governance - Benefits/Costs (in monetary terms) -open reply-(optional)	Better cost-recovery makes water reuse more viable. It should not create a lot of additional cost for MS as the action is incorporated in an ongoing planning and reporting exercise of RBMP
3.3.3 <u>Non regulatory measure</u> : Develop non-binding EU guidelines on how to foster water reuse - Pros and Cons -open reply-(optional)	Pros: Guidance documents can provide valuable compilation of experiences and be an informative instrument (as a first phase) to facilitate uptake of reuse practices by MS. It is a simple way to involve MS and to make them adopt those instruments. - Cons: the impact may be limited depending on the implementation/application of such “best practices” and the way MS enforce them during their authorisation.
3.3.3 <u>Non regulatory measure</u> : Develop non-binding EU guidelines on how to foster water reuse - Benefits/Costs (in monetary terms) -open reply-(optional)	Benefits: Some of the reuse potential can be implemented for a limited cost. - Costs: Establishing such instruments may be time consuming but the overall cost should be low (knowledge exchange and compilation exercise).
3.3.4 <u>Non regulatory measure</u> : Promotion of forthcoming ISO/CEN water reuse standards as a common reference for the management of health and environmental risks to be used by the Member States - Pros and Cons -open reply-(optional)	Pros: It is leveraging ongoing activity, based on broad international expertise. - Cons: The scope of the ISO/CEN water reuse standards is for the moment only covering irrigation uses. The scope would then be too narrow for the overall benefits of water reuse.
	Benefits : It could lead to an increase of reuse projects. - Costs: The use of

<p>3.3.4 <u>Non regulatory measure</u>:Promotion of forthcoming ISO/CEN water reuse standards as a common reference for the management of health and environmental risks to be used by the Member States - Benefits/Costs (in monetary terms) -open reply-(optional)</p>	<p>ISO/CEN water reuse standard would generate low regulatory costs.</p>
<p>3.3.5 <u>Non regulatory measure</u>: Awareness raising and dissemination of information on the various benefits of water reuse, among all key stakeholders - Pros and Cons -open reply-(optional)</p>	<p>Pros: Awareness raising and dissemination of information among all stakeholders has a strong influence on public perception. It will allow to educate and disseminate correct and unbiased information especially with the support of scientific studies. - Cons: Despite the necessity of such measure in order to lower barriers to water reuse, it has a limited impact on the direct promotion of water reuse. It is rather suitable as complimentary measure;</p>
<p>3.3.5 <u>Non regulatory measure</u>: Awareness raising and dissemination of information on the various benefits of water reuse, among all key stakeholders - Benefits/Costs (in monetary terms) -open reply-(optional)</p>	<p>The cost may be low compared to the overall benefit of such measures. Monetary estimation is difficult to make at the EU level.</p>
<p>3.3.6 <u>Non regulatory measure</u>: Develop non-binding EU guidelines on implementation of the Water Framework Directive and Urban Waste Water Treatment Directive (e.g.: clarify provisions of the Urban Waste Water Treatment Directive on water reuse; give priority to water reuse among alternative water supply options; encourage water stressed Member States to set targets for water reuse) - Pros and Cons -open reply-(optional)</p>	<p>Pros: It would allow mitigating some uncertainties as to considering water reuse as an option in integrated water resources management (IWRM). The measure could build on established procedures in relation to UWWTD / WFD actions and it would foster the impact of current directives. - Cons: As it is non-binding, the impact is limited. Compliance/uptake are uncertain.</p>
<p>3.3.6 <u>Non regulatory measure</u>: Develop non-binding EU guidelines on implementation of the Water Framework Directive and Urban Waste Water Treatment Directive (e.g.: clarify provisions of the Urban Waste Water Treatment Directive on water reuse; give priority to water reuse among alternative water supply options; encourage water stressed Member States to set targets for water reuse) - Benefits/Costs (in monetary terms) -open reply-(optional)</p>	<p>Benefits: leverage investments made for UWWTD/WFD implementation. - Costs: Direct costs should be relatively low.</p>
<p>3.3.7 <u>Regulatory measure</u>: Legally binding framework to require that, in water stressed river basins, MS assess the contribution of water reuse under different water stress scenarios and, when relevant, set targets for water reuse in accordance with a clear framework for managing health and environmental risks - Pros and Cons -open reply-(optional)</p>	<p>Pros: It is a targeted and effective measure with a significant impact. It is important to leave the decision to the MS on how to implement the solution according to the local situation. - Cons: However, it is probably difficult to achieve consensus among MS.</p>
<p>3.3.7 <u>Regulatory measure</u>: Legally binding framework to require that, in water stressed river basins, MS assess the contribution of water reuse under different water stress scenarios and, when relevant, set targets for water reuse in accordance with a clear framework for managing health and environmental risks - Benefits/Costs (in monetary terms) -open reply-(optional)</p>	<p>Benefits: better achievement of benefits of water reuse in river basins. - Costs: low for assessment, can be significant if quantitative targets are set, and adequate infrastructure needs to be built.</p>
<p>3.3.8 <u>Regulatory measure</u>: Legally binding minimum standards on water reuse at EU level addressing health and environmental risks - Pros and Cons -open reply-(optional)</p>	<p>Pros: high level of protection can be achieved. - Cons: demanding process to establish and to agree on minimum standards for multiple applications.</p>

<p>3.3.8 <u>Regulatory measure</u>: Legally binding minimum standards on water reuse at EU level addressing health and environmental risks - Benefits/Costs (in monetary terms) -open reply-(optional)</p>	<p>Benefits: harmonisation within EU. - Costs for establishment, implementation and monitoring may be high (particularly if standards are high, stringent). And thus may hamper reuse projects.</p>
<p>Promoting water reuse where relevant -single choice reply-(compulsory)</p>	<p>High</p>
<p>Safety of water reuse applications -single choice reply-(compulsory)</p>	<p>High</p>
<p>If you have any additional comments, please provide them in the box below: -open reply-(optional)</p>	<p>1. It is important to find a good balance between promotion of water reuse and its safe application. The risk is to end up with disproportional measures compared to other water resources which will counter perform on the stimulation of water reuse. For example, the cost of groundwater or surface water abstraction can be much lower if the distance to the reused water source is too long. - 2. Water should be judged according to its appropriateness for use not its origin.</p>