



EU restoration targets

EurEau feedback roadmap

Drinking water and waste water services have an essential mission: **the protection of human health and the environment**, so EurEau welcomes the opportunity to share its views on the inception impact assessment of the EU restoration targets.

We welcome the fact that the initiative is based on the art.191 TFEU. We want to stress that especially the principles enshrined in art.191.2 should indicate the path to follow: the precautionary principle, the principle that preventive action should be taken and that environmental damage should, as a priority, be rectified at source, and the principle that the polluter should pay.

In this context we welcome the relevance granted to the Fitness check on the water legislation and we support an **enhanced policy coherence in the EU legislation and Green Deal strategies**.

Indeed improving the quality and quantity of water resources are both crucial for biodiversity restoration.

The protection of water resources and the resilience to climate change are crucial for securing biodiversity and good quality drinking water.

The Marine Strategy Framework Directive (MSFD) and the Birds and the Habitats Directives (BHD) with their aim to restore biodiversity and protect species in the European waters are therefore truly complementary to the Water Framework Directive (WFD).

Although the synergy between the WFD, MSFD and BHD contributed to a serious improvement of the good status of water throughout Europe, more effort is required to reach the targets and objectives of these directives. The overarching policy coordination would benefit from the interaction between the implementation processes. The evaluation of the BHD in 2016 and the fitness check on the water legislation in 2019 reached the conclusion that the legislation is broadly fit for purpose but there is room for improvement in the implementation of relevant provisions that have not displayed fully their effects.

We believe that one of the main focus points of such an action plan should be the interconnections between the implementation processes of the water legislation and the BHD, as well as greater and more efficient involvement of relevant stakeholders.

Due to different policy procedures and time schedules, the implementation process of WFD and BHD measures are not always optimally aligned, or even worse, they



sometimes contradict each other.

Therefore, more efforts are needed to enhance the cohesion between the RBMPs of the WFD and the BHD Management plans.

We think that the implementation of the water directives should promote the synergy with the BHD, getting rid of the inconsistency between Article 4(7) of the WFD and Article 6(4) on the interpretation of 'overriding public interest'.

EurEau proposes to:

- ~ Address the connection between the WFD and the BHD in the BHD implementation action plan and integrate findings into the WFD implementation.
- ~ Get rid of inconsistencies between the BHD and the WFD, especially on the interpretation of the 'overriding public interest'.
- ~ Consider water bodies' resilience to climate change to improve the objectives of the WFD.
- ~ Improve alignment and coordination of implementation cycles.
- ~ Create more synergies and connections between RBMPS and BHD management plans.
- ~ Improve involvement of stakeholders in the implementation processes.



About EurEau

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

Our members are 34 national associations of water services. At EurEau, we bring national water professionals together to agree European water sector positions regarding the management of water quality, resource efficiency and access to water for Europe's citizens and businesses. The EurEau secretariat is based in Brussels.



With a direct employment of around 476,000 people, the European water sector makes a significant contribution to the European economy.