



EurEau reaction on the IIA REACH

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EurEau is the European association of water service providers with 34 national member organisations in 29 countries.

- ~ Drinking water suppliers have been raising concerns about persistent, mobile and toxic (PMT) and very persistent, very mobile (vPvM) substances as they can still be detected decades after their withdrawal from the market.
- ~ EurEau supports the review of REACH to close the knowledge and regulatory gaps, in order to prohibit the continued release of PMT/vPvM substances and other hazardous substances to the environment.
- ~ Based on the EFSA opinion of September 2020, EurEau calls for a complete ban of PFAS substances under REACH.
- ~ Protection of drinking water resources must be the top priority to avoid expensive and energy-intensive extra treatment by drinking water suppliers, in line with the Water Framework Directive (WFD) Art. 7(3).

## Extension of the generic risk approach

In line with article 191.2 of the TFEU, any sustainable chemicals strategy must start from **control-at-source** measures and apply the **Precautionary Principle**.

EurEau supports the IIA Policy option for reforming the restriction process by **extending the generic risk approach** (GRA) to all chemical substances so that they are regulated according to the intrinsic hazards they pose.

REACH explicitly takes into account the risks posed by indirect exposure of humans via the environment through consumption of food, drinking water and inhalation of air, which are influenced by releases of substances into the environmental compartments of air, water and soil. We advocate for an adjustment of the risk characterisation, so that it also comprises a general life cycle assessment of the effects of releases on water quality – especially if relevant to drinking water resources – and on the possibility to achieve the goals of the WFD and the Drinking Water Directive (DWD).

## PMT/vPvM substances must be regulated

The IIA policy option for reforming the restriction process includes extending the GRA to restrictions to PBT/vPvT. EurEau calls for the addition of **mobility** (included in the IIA to define the likely environmental impacts) and for the swift **definition** of PMT and vPvM substances **as substances of very high concern under REACH**. The **intrinsic properties** of PMT/vPvM pose serious long-term risks for the quality of drinking water resources.



## **PFAS pollution requires group restriction**

EurEau strongly supports the use of group restrictions. The rapidly increasing number of PFAS on the market, 5,000 approximately, requires a group approach (regulation by class) to avoid the long-term pollution of our aquatic environment. Water consumers should not bear the extra treatment costs of drinking water to meet the strict PFAS parametric values stipulated in the new DWD.

The PFAS Action Plan and the Commission Staff Working Document on PFAS (14/10/2020) should lead to the phase out of all non-essential uses. We support the restriction process initiated by NL, DE, DK, SE and NO, and call for this process to be expedited.

However, based on the EFSA opinion, which indicates that PFAS pose a threat even at ng/l concentrations, and given the fact that these substances are extremely hard to remove even with advanced drinking water purification techniques, EurEau calls for a complete ban of these substances. Subsequent approval of PFAS for essential uses can be restrictively envisaged, provided the appropriate risk assessment provisions and management measures are put in place.

## **Combination effects and Essential uses**

EurEau supports the **regulation of combination effects of priority chemicals** and to include this in the authorisation process of chemicals in coordination with the WFD, the Environmental Quality Standards Directive and the Groundwater Directive. We welcome the IIA policy option to make operational the concept of 'essential use' when developing restrictions, providing a common definition of non-essential uses according to the Montreal Protocol.

