



COMMISSION DRAFT DELEGATED REGULATION AMENDING CLP

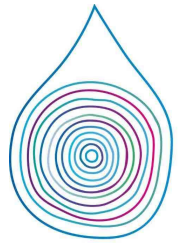
EurEau Feedback

EurEau welcomes the introduction of new hazard classes in the CLP regulation. The classification of substances according to these classes in the CLP regulation is essential to further restrict the use of hazardous chemical substances via REACH.

EurEau finds it positive that PMT (persistent, mobile, toxic) and vPvM (very persistent, very mobile) substances will now be classified and designated as hazardous. After all, these are the substances that provide a big challenge for water operators. Due to these properties, many PMT and vPvM substances are only partly removed by waste water treatment processes. They can even break through the most advanced purification processes at drinking water treatment facilities, and can therefore pose a threat to the quality of drinking water. These substances should consequently not be present in drinking water resources. The classification of PMT/vPvM substances, as proposed by the European Commission in the delegated act amending the CLP, must therefore lead to restricting/phasing out their use under REACH as Substances of Very High Concern (SVHC) in order to protect our health and water resources. This will also bring the objectives of the WFD closer, including the one formulated in Article 7.3 on the protection of drinking water resources.

Even though this proposal is an essential step towards better source control, EurEau would have preferred the proposal to be more ambitious. The proposed Mobility criteria do not cover all relevant substances for the drinking water supply. Research shows that the criterion for mobility should be a log K_{oc} value of 4 while for very mobile (vM) substances, a log K_{oc} value of 3 is considered sufficiently protective (UBA [report 126/2019](#)).

The proposed classification in combination with the current revision of the Industrial Emissions Directive and the Industrial Emissions Portal provides the opportunity to improve the permitting procedures of PMT/vPvM substances and other relevant pollutant emissions. Moreover, in the revision of the UWWTD, industrial waste waters with PMT/vPvM substances should never be authorised for release into the urban sewer network, given their intrinsic properties and the difficulties to remove them in external WWTP. Such an optimized licensing and registration system could lead to improved water quality. This supports the Chemicals Strategy for Sustainability Towards a Toxic-



Free Environment and could improve internal harmonization between all European regulations.



About EurEau

EurEau is the voice of Europe's water sector. We represent drinking water and waste water operators from 30 countries in Europe, from both the private and the public sectors.

Our members are 35 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.



EurEau

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