

Public Consultation on the Impact Assessment for the INSPIRE Directive

EurEau descriptive feedback – Appendix to Public Consultation

A well-functioning water sector is increasingly becoming a matter of concern in ensuring security and preparedness in the EU. EurEau calls on the Commission to mainstream this aspect in all relevant horizontal policies. This should also apply to the future revision of the INSPIRE Directive, which, in its current Article 13, allows for the exclusion of utility facilities, such as sewage and water supply, from its scope.

Ensure the security of critical infrastructure

While EurEau supports the efforts to increase public access to environmentally relevant spatial data, EU legislation must ensure the protection of critical infrastructure/essential services to prevent malicious acts and protect people's health and the environment. Restrictions must be maintained regarding public access to spatial data on e.g. water abstraction points, underground water utility networks and production and treatment facilities with relation to drinking water and wastewater.

The annex to Directive 2022/2557 on the resilience of critical entities defines drinking water and waste water sectors as essential services. Water utilities, identified as critical entities, have to identify and overcome vulnerabilities in their systems. Unlimited public access to geospatial data on their infrastructures would certainly be considered as a vulnerability. With a view to ensuring policy coherence, **Article 13 of the current INSPIRE Directive must be maintained and clarified in a way that geospatial data of the drinking water and wastewater sectors should not be made publicly accessible.**

We recommend the careful consideration of public interest in accessing geospatial data versus the equally justified need to protect critical infrastructure in a worsening security environment. This could be summarised in the recitals to the revised INSPIRE Directive.



Avoid duplication with other EU legislation

EurEau supports the objective of the INSPIRE Directive to provide relevant data about the soil, groundwater and surface water quality. However, duplication in reporting requirements must be avoided. **EurEau invites the Commission to evaluate policy coherence in terms of data provision and reporting requirements with regards to the following directives:** Water Framework Directive, Groundwater Directive, Urban Wastewater Treatment Directive, Nitrates Directive, Sustainable Use of Pesticides Directive, and the Drinking Water Directive, in particular, its Article 8.

Goal of the revision

EurEau supports the goals of the revision including the move to a **user-centric system**. Clearly, water operators are also users of these data (bathing water, groundwater quality and levels, drinking water resources, etc.). In addition, **there shall be a clear distinction between the applicability of the term "spatial data", as defined under the current INSPIRE Directive, and the term "environmental information" as defined by Directive 2003/4/EC on public access to environmental information. The latter should be without prejudice to the former in order to avoid triggering a significant (financial) burden** for information providers and go beyond the scope of the INSPIRE Directive.



About EurEau

EurEau is the voice of Europe's water sector. We represent 70,000 drinking water and waste water operators from 33 countries in Europe, from both the private and the public sectors.

Our members are 38 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.



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