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THE BONN CHARTER FOR SAFE DRINKING WATER

EUREAU POSITION

INTRODUCTION

EUREAU's vision for water in Europe is the provision of reliable and high quality sustainable water supply and wastewater services. Provision of such services protects public health and well being. They also ensure sustainable economic growth by enabling responsible use of water by industry and agriculture. At the same time, by working with a wide variety of stakeholders, the environmental sustainability of Europe's water resources can be ensured, thus enhancing the biodiversity and the natural beauty of the different countries of Europe.

The updated 3rd edition of the WHO guidelines for drinking water quality are recognised as the pre-eminent source of worldwide authoritative advice on provision of safe drinking water. The Bonn Charter for Safe Drinking Water was developed in parallel by senior water professionals from regulatory authorities, water companies, and research institutions across the world. It complements the WHO guidelines by providing a high-level framework designed for decision makers which summarises the governance, institutional and operational arrangements that are basic requirements for managing water supplies. In particular it sets out the roles and responsibilities of the different actors involved in the whole water supply process from source to tap.

Both the WHO guidelines and Bonn Charter emphasise an approach to managing drinking water quality in a coherent and systematic way, in which risks from source to tap are identified and mitigated, including raw water catchments and within consumer's premises. Such an approach is known as a Drinking Water Safety Plan (WSPs).

It is clearly recognised in the Bonn Charter that the general principles that it sets out have to be adapted to the local situation in the different regions of the world. This document therefore sets out Eureau's views on the Bonn Charter in the context of European water supplies. Whilst there is close alignment in approaches to management of water quality and water services, we believe that there are important caveats relating to the way that its provisions on access and pricing are interpreted in Europe.

COMMENTS ON ASPECTS OF THE BONN CHARTER IN THE EUROPEAN CONTEXT

Eureau has carried out a survey among its members to assess the extent to which the principles outlined in the Bonn Charter and WHO guidelines are already adopted. In general, these seem to fit well with the way that provision of water supplies has developed in Europe. For example across Europe, there are very rigorous independent regulatory systems to control the quality of water which closely follow the principles set out in the Charter.

There are however, a number of aspects which need to be interpreted in a European context.

Drinking Water Safety Plans

Many water suppliers have already adopted the practices set out in the Charter in their field of responsibility and this is demonstrated by the high quality of water provided by those companies. In this context, EUREAU firmly supports the principle of risk based process management (WSP) as an effective complement to, or in some areas alternative to, numeric parametric standards. In a number of MS, work is already in progress to develop a more consistent national framework for implementation of the DWSP concept. However, there would be benefit in adopting the WSP concept set out in the WHO guidelines and the Bonn Charter but under the principles of subsidiarity in a way which is sufficiently flexible to be adapted to local situations, but nevertheless retains a number of common concepts. In doing so, the following key points must be taken fully into account:-

- Current management practices by most water suppliers already incorporate many of the principles of the WSP approach. We therefore see no benefit in formalising the approach by regulatory means at a European level.
- Given the wide variety of water supply systems and institutional arrangements in different MS, we believe that a common European Framework could apply the principles of the WSP approach at a local Member State level.
- Whilst water suppliers are very willing to play an active and even leading part in WSPs, source water protection and plumbing systems are in general outside their responsibility, except where locally some water suppliers on a voluntary or contractual basis take responsibility of the protection of the sources. It is therefore vital that the responsibilities of all are properly and clearly defined.
- In particular stronger action has to be taken to vigorously implement EU policy for catchment protection.
- It is of vital importance that the approach encompasses the whole water supply process from raw water source to tap. This requires an active partnership between a wide range of stakeholders including property owners.

- Whilst Eureau supports the idea of third party verification of operating procedures, the mechanism for achieving this needs to be flexible enough to take into account the different approaches that have been adopted in MS. For example in some countries, technical codes of practice are verified by independent quality assurance schemes.
- For smaller supplies, there may be merit in exploring whether a more Generic simplified guidance document would be of value.
- A full debate needs to take place to establish the extent to which other policy instruments might be better able to achieve the desired results compared to legislation

Catchment Protection

A key principle of European water policy, which is fully supported by EUREAU, is that pollution should be dealt with as close to the point of origin as possible. This particularly applies to the need to provide high levels of protection of drinking water sources, which is enshrined in Article 7 of the Water Framework Directive and the proposed new Groundwater Directive. Such an approach is increasingly important in view of the growing evidence of climate change which could lead to further deterioration in raw water because of increased storm runoff and highly variable river flows.

EUREAU has previously supplied a number of reports and papers to the European Commission, which illustrates that there is a very significant and probably growing problem in Europe with contamination of raw water sources. This particularly applies to pesticides and nitrates, which are widespread problems across Europe, but can also cover other pollution from widely used synthetic chemicals such as pharmaceuticals, flameproofing substances, or chemical complexing agents. This must be a priority for EU policy implementation.

In addition and as set out in the report of the joint workshop between EUREAU and the Commission, we believe that much stronger measures need to be put in place to prevent accidental pollution of water sources through spillage of chemicals, oil or other materials.

Control of Water Quality beyond the Water Companies Pipes

Article 6.2 of the current Drinking Water Directive removes Member States obligations where non-compliance with standards is due to deficiencies in the plumbing or fittings in private domestic properties. However, this exemption does not apply to buildings where water is supplied to the public. Additionally Member States do have a responsibility under Article 6.3 to inform all customers of any such risks and take any other appropriate measures to reduce the risk.

EUREAU would support further moves at European level to provide a DWSP framework within which consumers and property owners could be given better advice on how they should install and maintain their internal plumbing systems and also buy pipes and fittings which are of appropriate quality. At the same time, it must be recognised that managing risks from plumbing in private properties should be primarily the responsibility of Member States through the principle of subsidiarity.

EUREAU is already actively supporting development of the European Acceptance Scheme (EAS) which relates to materials used by utilities under the Construction Products Directive as well as those used in domestic installations. We would support better links between this legislation and the quality requirements of the DWD, particularly to deal with the problem of new materials used inside buildings, although this will not deal with problems which arise from existing installations.

Application to small supplies

The charter tends to be written primarily from the perspective of larger public water supplies. However, it is clear that across many parts of Europe, there are a range of potential problems with smaller supplies, particularly where these are privately owned self-supplies, to which the charter may not apply as fully. Eureau would support the need for guidance document applicable to small supplies at EU level.

Control at State or local government level

In some countries with local or regional forms of government, it is important to recognise that primary responsibility for water issues tends to be with local municipal or regional government, compared to national Governments. In addition, the development of WSPs should be seen primarily as a process to strengthen local self-control with input from Government being minimised.

Water pricing

Eureau supports the general principle set out in the Charter that every person should have access to safe drinking water. We believe that this is already the case in Europe.

It is however, clear that the provision of public water supplies in Europe is a service, which has to be paid for as required under the cost recovery requirements of the Water Framework Directive. Eureau believes that water prices should not be set on the basis of income but would support, where necessary, people on lower incomes being subsidised through the Government social security system to ensure that they have adequate access to safe drinking water.

IMPLEMENTATION GOALS

Eureau believes that the international goal of the Bonn Charter

“Good safe drinking water that has the trust of consumers”.

is already largely achieved in Europe due to the existing regulations on drinking water which by definition is required to be safe and of good quality.

Nevertheless, we recognise that achievement of this goal requires continuous efforts by all parties including particularly water suppliers.

Eureau is very willing to continue to work with the European Commission and WHO to explore how these principles can be further promoted across Europe. It is, however, important that the approach is rolled out with care and with sufficient time to implement properly through a process of evolution not revolution. It is also vital to recognise that a wide range of stakeholders, changing between Member States, **must be involved through a fair and balanced responsibilities allocation**, if we are to achieve a comprehensive “source to tap approach”.