EUREAU

European Union of National Associations of
Water Suppliers and Waste Water Services

Union Européenne des Associations
Nationales de Distributeurs d'Eau et de
Services d'Assainissement

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Revision of the Drinking Water Directive 98/83/EC
Stakeholder Forum – 06/05/2008
EUREAU Comments on Chemical Parameters

A word about EUREAU

EUREAU is the European federation of national associations of drinking water suppliers and waste water services. Our members collectively provide sustainable water services to around 405 million European citizens. They reflect the full diversity of the European water services sector and represent both public and private operators. As the focus point of a European water network, EUREAU represents a unique concentration of technical, scientific and managerial knowledge and practical experience in water services.

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General remarks

- EUREAU believes that the maintenance of public health is paramount and must not be compromised. In this respect, EUREAU strongly believes that the directive 98/83 on water intended for human consumption (DWD) is effective in terms of the protection of consumer's health. This directive is still under implementation, involving massive investments not only in newer Member States (MS) but also in the EU15.

- EUREAU recognizes more needs to be done to implement the current directive and to ensure the long term sustainability of Europe's water systems and to fully meet the expectations of all European citizens with respect to their water supply services. As a professional association EUREAU strongly recommends all parties strive for and achieve the same level of drinking water quality and health protection throughout Europe.

- In light of toxicological, epidemiological, technical and managerial progress, EUREAU welcomes the discussion on a possible revision of the directive. In particular, the revision of the directive should clarify or update the health based targets for drinking water quality parameters and parametric values. In the view of EUREAU changes must be based on best available scientific information: The primary source of such information is WHO.

- EUREAU believes that any changes to parametric values must be practically achievable in a reasonable time frame, at a cost which is proportionate to the benefits that will accrue to European citizens.

- Any proposed parametric value must take into account the availability of adequate analytical methodologies which can be routinely used in laboratories across Europe.

- When proposing new parameters to be applied at the European level, a new DWD should continue to address only the issues which are relevant to public health across Europe. Under the principle of subsidiarity Member States may introduce additional standards if these are appropriate to their particular region or country.

- While reviewing the requirements for sampling/monitoring and for chemical water quality, the interconnections of both should be considered and a reasonable way of determining the sampling points for compliance monitoring should be found.

New categories for chemical parameters

- Regarding the application of risk assessment principles a move from the parametric approach in the current and former DWD to one encompassing risk assessment and risk management will lead to a significant change in the general approach of the DWD.

- EUREAU favours a risk based approach (in the sense of WHO Water Safety Plans) to determine the suitable nature and level of monitoring of drinking water quality.

- In EUREAU's view, the recommendation in the DHI report, that in the context of the

preparation of the risk management plans, the water supplier is the "competent authority" needs to be clarified, especially with regards to the water suppliers' responsibilities.

- In terms of an EU-wide harmonised compliance monitoring, EUREAU supports the setting of a core group of parameters as a basis for Member States to choose the locally relevant parameters according to a risk management approach. In this regard, the DWD must establish the public health relevance of the parameters included in this core group of parameters.

- EUREAU follows the logic of splitting the chemical parameters into two groups as proposed by DHI. However, this complication from the current and past directive requires further discussion, explanation and validation, such that in the end the rationale leading to grouping and subgrouping becomes evident to all stakeholders, with a dear foundation upon a public health criteria. Such provisions are essential to ensure buy-in by all authorities and smooth and consistent implementation throughout the EU.

- EUREAU appreciates that with parameters in group 1 and 2 the list can be reduced if chemical analysis and risk assessment demonstrate that certain parameters are not present in raw water or drinking water at levels of concern. EUREAU strongly recommends that the DWD provides rules, in the text or in the annexes, to determine the scope for such tailoring of the list. Rules should also be provided to help member states dealing with transitory non-compliances (percentile approach or else) for non-acute toxicity levels.

- Regarding group 2B EUREAU shares the concerns about endocrine disrupters, cyanotoxins, perfluorinated compounds, pharmaceuticals and other emerging substances. EUREAU agrees that appropriate analytical methods for the trace-level determination of these substances are under development. Therefore this subject requires more elaboration to allow correct implementation by the Member States. In order to verify compliance with the requirements of group 2B parameters, the monitoring of "marker" substances was suggested, but EUREAU strongly recommends that in this matter also, the health based targets be established, with provisions in the DWD text or annexes regarding the appropriate indicator substances to be tested or monitored.

- Regarding group 2C EUREAU supports the idea that product specification is an efficient way of controlling a number of potential contaminants. Correspondingly EUREAU is strongly in favour with the implementation of the EAS.

- EUREAU requests inclusion of defined procedures to be followed when cases of non-compliance with limit values arise. Such procedures should also address uncertainties in testing and measurement.

Reviewing of parameters

Pesticides

- The 0.1 ug/l pesticide standard laid down in the DWD corresponds to the precautionary principle.

- EUREAU has always argued that the primary approach to fulfilling this standard should be through prevention at the source, and not by means of expensive, non-sustainable "end-of-pipe" treatment which has to be paid for by customers instead of polluters. EUREAU is disappointed that more progress has not been made in this area, and urges the EU and Member States to make much greater effort to protect water bodies from pesticides.

- EUREAU regrets the discrepancy between the PPP (91/414) and the DWD, e.g. the different definitions of "relevant" metabolite in these pieces of legislation. The proposal to clarify "relevant metabolites" by referring to the DG SANCO document (221/2000 –rev. 10 25 February 2003) does not provide guidance to assessing the relevance of metabolites in drinking water.

Disinfection by-products

- As emphasised by WHO, in setting standards for disinfection by-products (DBPs) it is vitally important that this is not done in a way that precludes effective disinfection of drinking water. The risks from microbial contamination far outweigh the low and often theoretical risks from DBPs.

- While EUREAU welcomes the review of possible new DBPs for inclusion in the DWD, the overarching importance of maintaining disinfection must remain paramount.

- EUREAU supports the current standards and associated parametric values. If further changes are proposed based on future scientific evidence it is essential that these be at levels that permit proper disinfection of water supplies.

Chlorite

- If a Europe-wide standard is necessary, the inclusion of chlorite at the new WHO guideline value of 0.7 mg/l would be appropriate. Monitoring and sampling should be addressed in a risk assessment approach as recommended for group 2A parameters. Time should be allowed for utilities to adapt if chlorite is added to the new DWD.

HAAs

- The analysis of haloacetic acids is more difficult and expensive than analysis of trihalomethanes (THMs) because of the polar nature of the former. EUREAU accentuate the need for more data to address the matter in light of their potential occurrence and the health effects.

Cyanotoxins

- Control at source is the prime method to handle these substances. EUREAU supports more work at the catchments by control authorities under the WFD to reduce the level of nutrients, particularly phosphate, entering the aquatic environment in turn the amount of cyanobacteria blooms will increase thus further improving levels of protection.

- Microcystin LR is sometimes taken as an indicator for the occurrence of cyanotoxins in water, but EUREAU agrees that other cyanotoxins are of concern, and that analytical methods are under development. The difficulty of finding the suitable indicator or set of indicators remains, and this subject will require more elaboration at the WHO and DWD level to allow correct implementation by the Member States

Uranium

- A standard that might be set in the future should relate to the toxicity of uranium and recognise the costs and benefits of introducing a new standard. .

Benzene

- EUREAU understands the proposal to remove benzene from the DWD. The protection of raw water resources from substances such as benzene is primarily an issue for the Water Framework Directive and their Daughter Directives.