

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

[EU0-080627-06](#)

[Pt 5](#)

European Maritime Policy and the Marine Strategy Directive

Summary

Eureau supports the European Maritime Policy and the aims of the Marine Strategy directive but wishes to highlight its concerns in respect of the relationship of these with the programme of measures for the Water Framework Directive

EUREAU is the European federation of national associations of 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 of a European network, Eureau represents a unique concentration of technical, scientific and managerial knowledge and practical experience in water services.

EUREAU supports the development and aims of the Maritime Policy for the Union as well as the associated Marine Strategy Directive.

Where there is a concern about the impact of land based pollution on the marine environment EUREAU would wish to see a consideration of this in River Basin Management Plans as required by the Water Framework Directive. EUREAU welcomes the proposal for setting up of a project with the Joint Research Centre to look at the

assumption put forward in the Impact Assessment for the directive that 80% of marine pollution is land-based. This project will identify what existing legislation will deliver to assist in achieving the objectives of the directive and EUREAU will be pleased to take part.

EUREAU members do not have a direct responsibility for the management of water quality of our oceans and seas. Their main interest is to ensure that discharges from treatment works, storm overflows and surface water drainage systems in their ownership do not adversely impact on the marine environment. As the final recipient of treated waste water (either directly or via rivers) the sea is important to the water industry. The sea is also a key part of the water cycle, is important for Europe's biodiversity and influences the lives of many of our stakeholders.

Unlike rivers the sea acts as a 'sink' for pollutants from land-based activities and, as far as we know, for many of these, for example heavy metals, there is no self purification mechanism.

As well as waste water discharges there are diffuse sources of pollution both urban and rural which must also be controlled to protect the marine environment.

EUREAU members' potential impacts on the marine environment are already regulated in respect of the Urban Waste Water Treatment Directive, the new Bathing Water Directive, the Shellfish Waters Directive, the Habitats Directive and the Water Framework Directive and its associated future daughter directive on priority substances. We recommend that the river basin planning mechanism under the Water Framework Directive specifically considers pressures and impacts of land-based activities on the marine environment. It is important to ensure that the programmes of measures and the associated investments made by waste water services providers deliver good ecological status on land and coastal areas together with the new target of good environmental status in the sea as required by the marine strategy directive and any other requirements of EU maritime policy.

We believe the environmental aims of the European maritime policy should be subject to the economic tests of the Water Framework Directive i.e. demonstration of cost effectiveness, assessment of disproportionality and cost recovery using the polluter pays principle. It is also important that the strategy should be fully sustainable, designed to ensure that its objectives will not cause or exacerbate other environmental issues e.g. carbon emissions.

Members of EUREAU, on behalf of their customers, have already invested millions of Euros in complying with the requirements of the above mentioned directives and much more expenditure is planned. It is important that the value of this investment to the marine environment is recognised and that any additional waste water treatment requirements are identified as soon as possible.

