

# 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**

### **EUREAU Comments on Microbiological Parameters**

#### **Summary**

The European Commission intends to revise the current Drinking Water Directive 98/83/EC. This also concerns a revision of microbiological parameters. A number of detailed recommendations have been made by EGM at the stakeholder consultation on October 23, 2007 in Brussels. Some concern agreed issues while others are still under discussion.

In general Eureau welcomes the recommendations by EGM, but some recommendations need further clarification. Also Eureau stresses the importance of research needs related to the revision of microbiological 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.

## Principles for changes in 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 change to parametric values must be practically achievable in a reasonable timescale, at costs which is commensurate with the benefits that will accrue to European citizens.
- The proposed parametric value must take into account the availability of adequate analytical methodologies which can be routinely used in laboratories across Europe. In case that those analytical methodologies are not available these need to be developed with priority.
- When proposing new parameters to be applied at the European level, the Directive should retain the issues which are relevant to public health across Europe. Under the principle of subsidiarity, MS may introduce additional standards if these are appropriate to their particular region or country.

## Comments on the preliminary opinion from the Expert Microbiologist Group as presented at the Stakeholder Consultation Meeting, 23 October 2007, in Brussels

Preliminary opinion from the EMG	EUREAU comments
<i>Agreed issues EMG</i>	
Clostridium perfringes to be removed from compliance monitoring	-
E-coli and Enterococci are useful indicators: to be kept	EUREAU agrees
Terminology to be described with reference to WHO-guidelines for drinking water quality	EUREAU agrees. Terminology should also be described in reference to ISO standards
Colony count “no abnormal change” to be rephrased: - Another guideline value - No proposal agreed on within the group	Colony counts have only limited meaning for public health. It should then be left to the appreciation of operators to use it, or other bacterial development indicators
Specify “bottled water” and “tap water”, keep specific regulation for bottled water in revised DWD	EUREAU agrees
E-coli: current reference method is not suitable for a number of drinking waters	EUREAU agrees. Specific methods may be needed for some drinking waters. Therefore, other comparable methods, which are validated, have to be accepted.

<b>Preliminary opinion from the EMG</b>	<b>EUREAU comments</b>
Reference to ISO 8199 (enumeration): “0 in 100 ml” is regarded to be problematic → include a reference to the relevant ISO standard 8199 and term values for microbiological counts	EUREAU supports the idea of “<1 in 100 ml”. This is an acceptable risk. However, this approach requires a clear explanation to the public
ISO 19458: a reference to the standard for microbiological sampling is suggested	Eureau supports reference to ISO 19458 for sampling of potable water from a tap. The DWD should give clearance about the purpose of taking samples at the tap, and give reference to a standard for sampling
Enterococci sampling frequency to be increased	According to EUREAU there is no need to increase the sampling frequency for Enterococci. EUREAU supports the alignment of Enterococci frequency with E-coli frequency
WSP approach in general: - Support for the WSP approach, also for microbiological issues - WSP includes end product control	EUREAU supports the water safety plan approach for microbiological issues. End product testing will still be necessary, but the water safety plan approach should result in a relaxation of end product control. The water safety plan approach requires that also for internal plumbing systems a water safety plan should be set up addressing the water quality in buildings and private properties
Pathogens: - Routine monitoring for pathogens is not recommended - However, pathogens need to be analysed in relevant outbreak situations - There is a need for suitable methods for pathogens - A specific list of methods for pathogens analyses is not possible to be set	EUREAU agrees. For pathogens, a risk assessment/risk management approach is needed as part of the water safety plan. In case pathogens are analysed, this should be done at the point of contamination and in the source that is used for the production of drinking water

Preliminary opinion from the EMG	EUREAU comments
<i>Under discussion</i>	
Influence of WSP approach on methods, values compared to current DWD	WSP approach may have effects on frequency of monitoring and may result in a relaxation of end product control
Coliform bacteria: not suitable as faecal indicator but may serve other purposes. If Coliform bacteria are kept in the DWD, then issue concerning method and definition	EUREAU agrees. According to local conditions, operators may decide to use coliform bacteria as indicator for environmental contamination. Different validated methods have to be accepted for coliform bacteria
Coverage of DWD: - The coverage of the DWD concerning buildings and special types of buildings has to be described in more detail - Legionella: depends on this discussion	- EUREAU agrees the coverage of the DWD concerning buildings. The terminology “special types of buildings” should be specified as “buildings which are public or have a public function” - Legionella should not be regulated in the DWD. Infection by Legionella organisms is only caused by inhalation of aerosols containing the bacteria in high quantity and not by drinking water containing the organisms. Therefore, Legionella pneumophilia are only of concern where they colonise heated, or warm, water systems in buildings that generate such aerosols. Correct management of building water systems is essential for the control of Legionella. It is important that the responsibility for such management is clearly defined
E-coli methods: the need to change the current reference method is recognised	EUREAU agrees. There is a need for a reference methods for all types of waters, or other comparable methods (for specific types of waters), which are validated, have to be accepted
Small supply parameters / minimal sampling: postponed	-

Preliminary opinion from the EMG	EUREAU comments
Clostridium perfringens or Sulphite reducing spores: no conclusions, depends on the purpose of the measurement	In case a choice has to be made between Clostridium perfringens and Sulphite reducing spores, Clostridium perfringens should not be exchanged for Sulphite reducing spores, as the water operators have just build experience with the use of Clostridium perfringens

### Research needs

EUREAU identifies the following urgent research needs concerning microbiological parameters and their methods for analysis. In the view of EUREAU the European Commission is the appropriate organisation to take up the challenge to initiate research to tackle those questions with priority.

Clostridium perfringens	It is recognized that the method for analysis of Clostridium perfringens needs to be approved. The EC should initiate a project to improve the method of analysis.
Colony counts	It is recommended to develop another general parameter for routine monitoring of total microbial activity / concentration, as an alternative for colony counts. This method should provide more specific results and conclusive information
Pathogens	<ul style="list-style-type: none"> <li>- More knowledge about which parasites (species &amp; strains) that are relevant to water supply is needed</li> <li>- It is recommended to start develop lists of available methods for determination of pathogens as part of the WSP approach</li> <li>- The definition of index pathogens for different groups of pathogens (viruses, protozoa, bacteria) is necessary</li> <li>- More information about the persistence of pathogens in the environment and in the treatment needs to be developed</li> </ul>
Coliform bacteria	In case Coliform bacteria are kept in the DWD the issue concerning method and definition needs to be solved

Microscopic water analysis and research	Microscopic analysis and research of water samples can be beneficial in judging the water quality, and needs further development.
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