Micropollutants in water: thoughts on regulation

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Introduction

• Micropollutants present many challenges – not least as much is not understood – they are ‘emerging’
• “Emerging pollutants” in what way?
  – In understanding of sources, presence and pathways in the environment
  – In understanding of impacts (short, long-term) (acute, chronic), etc.
  – In entering the regulatory system
EU regulatory framework

• Quality objectives (do what is needed to meet these)
• Product controls:
  – Product licenses (stopping some products)
  – Market restrictions on products (controlling use)
  – Product quality (substances in products)
• Emission controls
Quality objectives: limits

• EU water law now has two broad quality approaches:
  – Ecological objectives (GES) – so address anything that affects this (incl. Substances)
  – Specific chemical standards (EQSD, GWD, etc.)
• GES – hard to demonstrate micropollutants affect this
• EQS – current directives cover limited number of substances:
  – Current debate on a ‘watch list’ of 10 substances shows difficulties of a long list
  – Requirement to monitor and/or assess attractive, but is costly
Product controls

- REACH/CLP has the basis to assess and control substances covered within their scope
- Pesticide controls available – more scope for use
- Where alternatives available, take a precautionary approach to substitution principles (e.g. Cosmetics)
- Still many substances for which environmental testing not in place, but which are deliberately put into the environment – pharmaceuticals (human, veterinary)
Emission controls: limits

• Controls either:
  – On limited number of specific pollutants
  – Framed so could catch more pollutants (e.g. IED), but number in permit conditions is limited

• For micropollutants, problems for defining emission limits:
  – Numbers are small (presents practical limits)
  – Determining numbers based on justified analysis
Final remarks

• Is a comprehensive ‘regulatory’ framework for micropollutants possible?
• Or is there is regulatory landscape with ‘holes’
• Closing some gaps would address some problems, but far from all substances