



The water sector perspective on the SUR proposal

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Who we are

- ~ EurEau is the **European Federation of Water Services**
- ~ **35** national associations of **drinking and waste water operators** from **30** European countries
- ~ Providing “essential services”
- ~ Realising the human right to water and sanitation
- ~ Protecting health + environment



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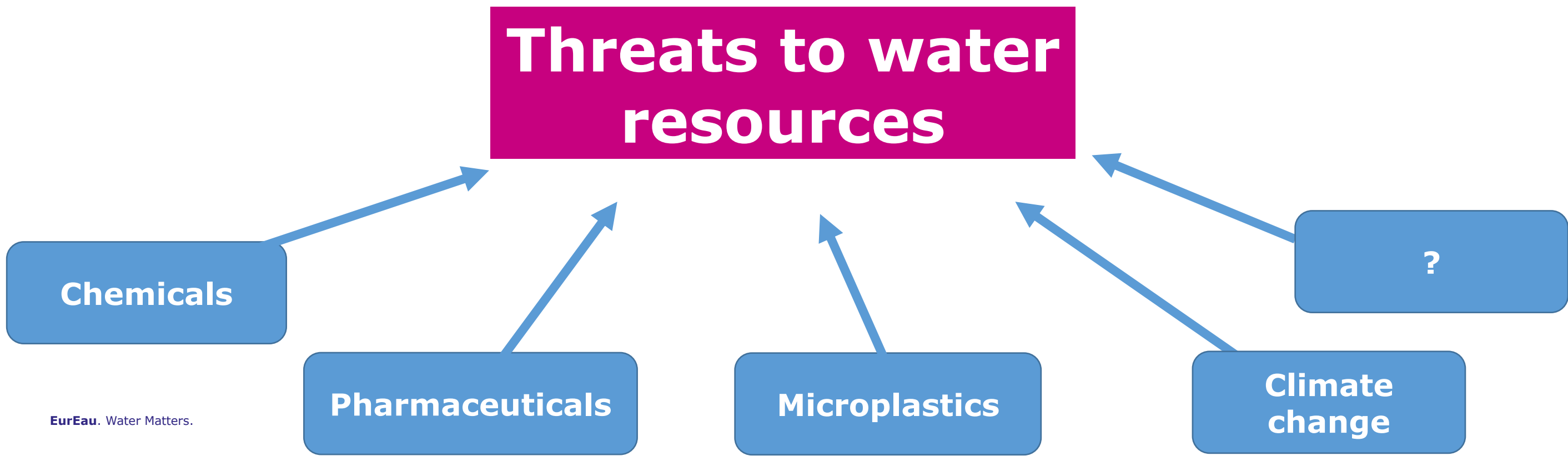


6 CLEAN WATER AND SANITATION



Protection of water resources

- ~ Prerequisite to fulfil our mission
- ~ Legal obligations: Art. 7.3 WFD + Art. 8 new DWD



Legislative framework

Water Framework Directive (WFD)

Control at source

Cost Recovery Principle

Polluter Pays Principle

The water consumer should not bear the cost of extra treatment, but the polluter-pays principle should be applied.

Drinking Water Directive (DWD)

Pesticides: 0,1 µg/l



in active substances,
metabolites and
transformation products

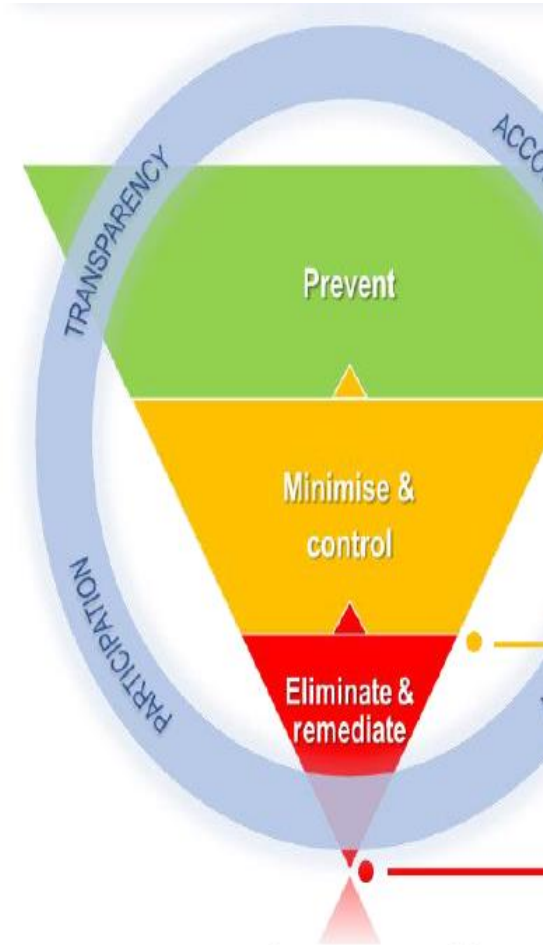
The extra-treatment has been applied increasingly over the past 20 years to comply with the DWD – consumers pay more.

Why we need an ambitious SUR

- ~ Costs/savings/benefits to wider society and environment
- ~ Water operators have to invest more and more to treat pesticides pollution in the aquatic environment and comply with DWD standards
- ~ Higher costs for consumers → affordability concerns
- ~ **Extra-treatment means increase in energy consumption → not in line with climate neutrality**
- ~ **Metabolites** limited (human) toxicity data (no ADI values)
- ~ Possible hazardous **transformation products** due to treatment (**Tolyfluanid**)
- ~ **Regulation must be in line the Zero Pollution Hierarchy :**
 - ~ **Precaution + Prevention + Source control + Polluter Pays**



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COSTS for drinking water treatment (pesticides)



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PRAGUE (CZ)

WTP Zelivka (110 million m³/a) -> additional activated carbon filtration (+ ozonation) due to pesticides in drinking water resources (2018-2020) => **EUR 50 M**

WTP Podoli (40 million m³/a) => **EUR 5 M**



PILSEN (CZ)

- upgrade drinking water treatment plant due to pesticides (2013-2017)
=> **Investment: EUR 4 M**



HALTERN (DE) (100 million m³/year)

- Average activated carbon costs (PAC: 300 t/year) => **EUR 0.6 M**
- Average costs cooperation with farmers => **EUR 1 M/year**

New SUR will protect water resources better!



- ~ Support for the inclusion of water used for abstraction of drinking water under sensitive areas - art.16 (f) (i)
- ~ Derogations: support of the conditions outlined – art.18
- ~ **BUT improvements needed** on some provisions:
 - ~ The information requested under art.18
 - ~ The access to the information – art.16 + art.18
 - ~ Buffer strips size - art.18

Information and access to information



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To identify and manage risks to human health, under art.8 of the new DWD, it is essential that the following information is also gathered in the permit under art. 18.6 and art.18.8:

- ~ Amount of products used
- ~ Number of applications / year / hectare
- ~ Information **must not be anonymised (art.16)** and must be **granular: land-plot level**
- ~ Information must be **timely+accessible** simultaneously to:
 - ~ **Competent authorities implementing the SUR and the DWD (art 18.5)**
 - ~ **Drinking water operators**

Buffer strips – art.18.2

- ~ 3 metres good for groundwater safeguard zones
- ~ But depending on:
 - ~ the local conditions of soil
 - ~ the intrinsic properties of the pesticides
- **3 metres may not be enough!**
- ~ Art.18.2 should reflect this:
 - ~ *Member States shall establish larger mandatory buffer zones adjacent to sensitive areas according to the risk assessment carried out considering the local conditions of the soil and the intrinsic properties of the pesticides.*

Thank you for your attention



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