

Additional input to the “Public Consultation to inform the Fitness Check of the EU Water Framework Directive, its associated Directives (Groundwater Directive and Environmental Quality Standards Directive) and the Floods Directive”

### Question 1

Others:

- Sustainability is defined different from country to country
- Protection against reprocessing is effective
- A high percentage of native reprocessing is already implemented
- Management plans to prevent droughts in Upper Austria have had a positive impact
- There is no linking scientific study between drought periods and the WFD
- Droughts should have been part of the climate strategy
- Additionally, to the WFD a complete source control should be achieved thru legislation in pesticide and biocide regulation as well as in the priority substance directive.

### Question 2

Others:

- Coherence with agricultural pollution must be explained → intensive agricultural use has a high responsibility for water pollution;
- Coordinating the implementation of legislation: Too many different pieces of legislation;
- There are always new substances in sewage treatment plants that are not recorded, therefore, certain substances should be banned in advance;
- Duration of planning cycles: Shorter times would be problematic;
- EU support of subsidies: Is not available regionally, very complicated and has high administrative burdens

### Question 3

Others:

- WFD: there is potential for improvement in the industry sector/subareas

### Question 8

Others:

- The question regarding hydropower plants, has to be more specific
- Insurance premium: Location defines position → positive from the publics point of view;
- Positive effects: many new technologies for fish ladders and water ecology have been implemented; higher value of organic farming

### Question 10

Comment: Commission has to change competencies for this

Question 19

Others:

- “Better integration of water with other or water depending sectors” → there has to be a better cohesion/ cooperation with energy
- “improved water quantity” → pointless question

Question 20

Comment: This question is not serious!

Question 44

Self-contained systems must be considered in their entire cycle, e.g. water-saving fittings, but still outdated sewer systems

Question 48

Comment: poor coherence in the matrix! The targets must be to protect water resources! Environmental objectives have priority; precautionary principle; no internalisation of external costs!

Others: Chemical-related guidelines must be tightened up in order to relieve environmental guidelines/ the WFD

Question 50

Comment: Protection of water resources is eminent. At the operational level: data harmonization is important.

Final comment

If it is inevitable that the Directive will be opened, this should only happen in considerably limited areas, otherwise the Directive is likely to be watered down. In such a case, the human right to water must at least be included in the comments, as requested by the ECI Right 2 Water.