

Position of the VÖWG regarding the Water Framework Directive

Improving water quality is an on-going process. The EU-WFD has proved its success and its implementation made a significant contribution to enhancing water quality. The improvement of water quality is not completed with the last management cycle in 2027. Measures to improve or safeguard water quality often show a delayed effect in the environment, which must be taken into account when assessing and specifying planning cycles. With the EU WFD de facto coming into effect with the first River Basin Management Plan (RBMP) in 2009, it is foreseeable that many Member States will not be able to uphold the deadline of 2027. Therefore, a continuation and prolongation of the WFD is mandatory, while its implementation needs to be reinforced and supported to achieve overall good quality status in European aquatic eco-systems. VÖWG is convinced that it is an effective and well-crafted legislative key instrument and vital part of the European water policy.

Additionally, VÖWG likes to add that:

- **Resource protection shall not be compromised:** The protection of water resources and water quality must always have priority. In the event of conflicts over the use of water resources, the use of drinking water must have the highest priority. The principle of Article 7.3 of the EU WFD must be taken into account.
- **Water legislation must be coherent:** EU legal acts must not compromise the protection of water resources as the primary objective of the EU WFD, but on the contrary, it must contribute to the achievement of the objectives. This includes legislation in the field of agriculture (Common Agricultural Policy, Nitrates Directive, etc.) and in the field of chemistry (Pesticides & Biocide Regulations, Priority Substances Directive).
- **Costs of necessary investments must be covered:** Necessary investments in the drinking water supply structure in the course of maintenance and/or renewal of water supply installations must be compensated. Under consideration of the long planning cycles (50 years and more) in water supply, financial resources for necessary investments must be secured.
- **The polluter pays principle must take precedence over end-of-pipe solutions:** End-of-pipe solutions must not be seen as the first and only solution strategy. Costs for the protection of drinking water resources and treatment must not be borne by the water suppliers or consumers. Rather, the polluter pays principle should be taken into account and impurities should be tackled where they come from.
- **Exceptions must not be the rule:** Exceptions under Article 4 of the EU WFD are already possible now, if it is foreseeable that the achievement of objectives cannot be achieved within the

time envisaged. However, exceptions must not become norm. Measures to achieve objectives and improve water quality are also to be taken beyond 2027.

- **Communication and monitoring have to be improved:** In addition to the one-out-all-out principle, supplementary information is to be provided on the general condition ("good condition") for the individual assessment classes (biota, chemistry, etc.), to obtain better information on developments in the situation, which also facilitates the argumentation for necessary investments to improve quality. Therefore, a common communication strategy should be devised by the Commission to promote and substantiate the implementation of the directive.
- **“Right2Water” must not be abused** to justify weakening resource protection and source control in the European Union. To satisfy demands of the successful European Citizens Initiative “Right2Water”, access to water shall be part of the reporting obligations of the member state to the European Commission.
- In the hydropower sector, improving efficiency cannot always compensate production losses associated with environmental adaptation measures. Efficient and sustainable water use for energy production can therefore only succeed if technical-economic and ecological sustainability/efficiency are considered in a balanced way. Technical and morphological improvement (revitalisation) of hydropower plants should not be seen as the only option. The construction of new power plants at suitable locations is usually accompanied by an ecological improvement, for example if a power plant is erected on existing transverse structures (such as ground sills and bed load barriers) together with fish ladders and should therefore also be seen as an option.
- Failure to achieve good ecological status according to EU-WFD goals should be countered by support by the European Commission by devising an effective benchmarking tool and governance guidelines, inspired by best practices throughout Europe. Moreover, countries struggling with the implementation should be funded through the CAP, as protection of resources is essential for a sustainable agriculture. Additionally, the reasons for continued non-compliance should be investigated and then carefully assessed what is achievable within the framework of sustainable development goals. After all, water is the most important resource for life on the planet.