

POSITION PAPER

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Think Blue: Orgalim recommendations for the improvement of the Water Framework Directive

Nowadays, only 40% of Europe's waters are in good ecological health. Climate change, and competing water uses closely linked to population growth and insufficient water treatment, have been some of the main challenges determining the current status of Europe's freshwaters. To alleviate these persisting environmental pressures and increase the percentage of good water quality, Orgalim, Europe's Technology Industries, advocates for [the sustainable use and management of water in Europe](#).

European technology manufacturers offer innovative water technology solutions that hold enormous potential to help protect water quality and quantity: the main goal of the Water Framework Directive (WFD, [2000/60/EC](#)) - the European Union (EU)'s key water legislation. Orgalim welcomes the European Commission (EC)'s recent Fitness Check of the WFD, its associated directives¹, and the Flood Directive, in light of progress achieved and their potential to address new societal challenges.

We agree with the Fitness Check's finding that the Directive is fit for purpose, with scope to improve. With regard to the Directive's delayed implementation and the immense challenge of achieving the good status of all water bodies by 2027, we call upon the EU, member states, and other stakeholders to enable the uptake of a wide range of European water technology solutions, which can contribute to the current and future effectiveness of the Directive. Our sustainable, energy-efficient, circular and smart water technologies are fit to contribute not only to achieving the objectives of the WFD, but also the UN Sustainable Development Agenda and the wider EU policy goals of climate neutrality and adaptation, a circular economy and a zero-polluted environment as enshrined in the European Green Deal.

It is in this context that we urge the EU to **improve** the Water Framework Directive in such a way as to:

- **Include addressing water scarcity to protect available freshwater resources.** Water stress, felt across one third of the EU territory, requires an urgent legislative measure that would incentivise and facilitate the sustainable use of water as well as clear reduction targets of water losses in member states, with a view to achieving zero-water leakage by 2050. The EU should also focus on raising awareness on water scarcity and the cost of non-revenue water.

¹ The Environmental Quality Standard Directive ([2008/105/EC](#)) and the Groundwater Directive ([2006/118/EC](#)).

Orgalim represents Europe's technology industries: companies that innovate at the crossroads of digital and physical technology. Our industries develop and manufacture the products, systems and services that enable a prosperous and sustainable future. Ranging from large globally active corporations to regionally anchored small and medium-sized enterprises, the companies we represent directly employ 11 million people across Europe and generate an annual turnover of around €2,000 billion. Orgalim is registered under the European Union Transparency Register – ID number: 20210641335-88.

- **Boost energy efficiency in the water sector to contribute to accomplishing the climate neutrality goal by 2050**, by setting concrete interim energy efficiency goals by 2030 through the Energy Efficiency Directive, due to be revised in 2021.
- **Reinforce the implementation of Article 9 on cost recovery and water pricing** across all member states and therefore stabilise water financing for current and upcoming water measures. The EU should empower member states to embrace a cost-reflective water price, which would increase the awareness of water's appropriate value among its users as well as boost the roll-out of smart water technologies in the market.
- **Step up 2021-2027 EU financing** available for water sector specific needs and innovative water technologies. As a complementary measure to Article 9, the EU should bridge the existing water finance gap to enable member states and local authorities to comply with the WFD and Flood Directive's requirements, while factoring in new measures in financing needs, such as drought/flood adaptation measures, and energy and water leakage reduction measures. Furthermore, the EU should dedicate financial means to research on the effects of emerging micropollutants present in water.
- **Consider the impact of updating the list of priority substances under the EQSD** to the non-deterioration and the one-out-all-out principles as well as to the overall goal of achieving good ecological status, which may become more challenging. Before updating the list, we call upon the Commission to conduct further research on possible priority substances and the combined effect of substances.
- **Consider revising the non-deterioration principle** in light of allowing necessary projects and sustainable development activities, as they should no longer constitute exemptions to the EU environmental legislation. Furthermore, the Commission should **acknowledge that the 'one-out-all-out' principle** leads to difficulty in assessing progress towards good ecological water status. The principle needs to be revised, as the enhancement of individual components or the general status of water body is not visible due to the current assessment system. Better monitoring and reporting of each factor that contributes to water status should be considered, while taking into account the occurrence of other pollutants in water, such as air-borne ones and the those stemming from soil erosion. Also, the Commission should set realistic targets for 2027 and beyond.
- **Strengthen the polluter pays principle** and enable non-centralised, cost-efficient treatment of users' waters and sewage before being discharged into surface waters. The Commission's consideration to apply this principle through the extended producer responsibility would be challenging, due to the great difficulty of interlinking the micropollutants in the effluent from waste water treatment with the producers of the original products. We draw attention to diffuse sources of pollution, the issue which has been overlooked in the current legislation.
- **Mainstream digitalisation and the Internet of Things in the water sector.** Enhanced use of management and metering data would lead to evidence-based decision making, both at regulatory and consumption level. Better deployment of already existing digitally-enabled water technologies can ensure reliable distance monitoring and reporting of water quality, leakages, use and resources.
- **Benchmark water sector service in the EU, as a follow-up measure**, which would facilitate the exchange of best practices and technology solutions in the EU and beyond.

- **Explore synergies with the energy, climate and agricultural policies.** The WFD should benefit from the European Green Deal's enabling framework which may serve to facilitate linking other policy areas with water objectives, such as the water-energy nexus, sustainable use of water and tackling diffuse pollution. Furthermore, the Commission should **build up policy coherence** with the Industrial Emission Directive, potentially through the upcoming zero-pollution plan for air, water and soil, in an effort to avoid legal uncertainties – including the ones related to the thresholds between the WFD and the IED .

We strongly advocate that these recommendations are taken into account when improving the WFD and formulating the zero-pollution action plan for air, water and soil in 2021. Europe's innovative technology industries are ready to lead the transition to a greener, water smart society and cities with other stakeholders on board and the right policy and institutional solutions in place.