

International Association of Waterworks in the Rhine river basin (IAWR)

concerning the draft International River Basin Management Plan 2016-2021

Attention given to drinking water and relevant substances should result in actions

IAWR is pleased with the attention given to the use of the River Rhine as a source for the public drinking water supply in the draft International River Basin Management Plan for 2016-2021 (RBMP). We appreciate the efforts under the coordination of the International Commission for the Protection of the Rhine (ICPR) to evaluate emissions of several groups of micro-pollutants and the development of a strategy to reduce such emissions. Also, the monitoring of and reporting on drinking water relevant substances in the ICPR is welcomed by IAWR (acesulfame, diatrizoic acid, AMPA, bisphenol A, carbamazepine, diclofenac, 1,4-dioxane, diglyme, DTPA, EDTA, ETBE, glyphosate, iopamidol, iopromide, 2-methoxy-2-methylpropane and tributyltin cation). However, since the monitoring results show exceedances for some substances (iopamidol, diclofenac, bisphenol A, glyphosate, isoproturon and very recently metolachlor) we expected to find some words about the ongoing work to tackle this issue. We know it is now being addressed by the ICPR expert group on diffuse sources (SDIF) but unfortunately we did not find any mention of this in the RBMP. As long as the target values of the European River Memorandum¹ are not achieved it is impossible to produce drinking water from the Rhine River sustainably. The memorandum mentions that it is the explicit goal to achieve a surface water quality that allows drinking water to be produced with only natural processes, which is in line with the strategy set out in the Water Framework Directive (WFD). Natural treatment steps are based on the purification power of nature itself and retain the natural characteristics of the water. The production of drinking water using natural methods also saves energy and resources and is, therefore, friendly to the environment and climate. The focus of the RBMP needs to be on prevention of emission – in accordance with the precautionary principle – and if drinking water relevant substances do end up in the Rhine in concentrations above the target values an appeal needs to be made to the emitters – in accordance with the polluter pays principle –. Without further action such as is now being prepared by the expert group SDIF neither good chemical status nor the goals of WFD article 7 will be reached in 2021 or 2027.

Discrepancies and confusing messages should be avoided

The draft RBMP 2016-2021 highlights some discrepancies between the demands of the WFD and the previously implemented or planned measures. There are several reasons for these contradictions:

- Differences in reporting forms: partly already implemented measures are not reported, leading to communication problems.
- High numbers of exceptions in the countries: reasons for exceptions are numerous and are sometimes (partially) misused to delay actions.

Application of different legal bases: Directive 2013/39/EU should be implemented by September 2015 into national law but some countries are already reporting accordingly while others are still reporting according to the previous version which is still in force.

¹ [Memorandum regarding the protection of European rivers and watercourses in order to protect the provision of drinking water](#)

Overall, the current evaluation of the chemical status results in a poor prognosis for the achievement of objectives. At this point, almost all water bodies are assessed as "not in good chemical status" due to exceedances of environmental quality standards (EQS) for some (groups of) priority substances. These exceedances concern almost exclusively the so-called ubiquitous (group of) substances (mercury, hexachlorobutadiene, brominated diphenyl ethers, some PAHs and TBT). Due to the ubiquitous and persistent nature of these substances, there are generally only very few actions which are effective to reduce concentrations of these substances in the short to medium term. However, at present none of these ubiquitous substances are drinking water relevant, while others are. This leads to the confusing message that the Rhine River is not in good chemical status – due to some priority substances which are not drinking water relevant – while its use as a source for drinking water is under pressure by another set of substances. The focus for measures by Member States should be on drinking water relevant substances that hinder achieving the goals of WFD article 7 as well as on priority substances on which good chemical status are based. There should be more attention for drinking water relevant substances in order to achieve the goals from article 7 of the WFD.