

Coalition of the European River Memorandum (ERM)

January 2023, Feedback on the proposal, updated May 2023

Integrated water management – revised lists of surface and groundwater pollutants

The ERM Coalition of drinking water suppliers' associations represent 170 water suppliers and 188 million drinking water consumers living in the river basins of Rhine and Ruhr, Danube, Elbe, Meuse and Scheldt depending on clean drinking water in 18 states including the 13 EU member states Austria, Belgium, Bulgaria, Croatia, Czechia, France, Germany, Hungary, Luxembourg, the Netherlands, Romania, Slovenia, Slovakia.

Drinking water suppliers in the ERM Coalition are convinced that a future-proof drinking water supply requires a comprehensive protection of drinking water resources. Their common understanding is laid down in the European River Memorandum (ERM)

<https://en.iawr.org/timm/download.php?file=data/docs/aktuell/european-river-memorandum-2020-en.pdf> and the European Groundwater Memorandum (EGM)

https://en.iawr.org/timm/download.php?file=data/docs/lit_memoranden/europeangroundwatermemorandum_2022_en.pdf. Both memorandums are designed as guidelines for legislation at European level, meaning in this context: Set ERM target values as Environmental Quality Standards (Priority Substances list) and as Groundwater Quality Standards (for groundwater priority substances).

ERM target values: For anthropogenic (non natural) substances, the ERM sets the following target values (maximum values) per individual substance:

- 0.1 µg/L Evaluated substances with known effects on biological systems, except if toxicological findings require an even lower value, e.g. for genotoxic substances;
- 0.1 µg/L Non-evaluated substances that cannot be removed sufficiently by natural procedures;
- 0.1 µg/L Non-evaluated substances that form non-evaluated degradation/transformation products;
- 1.0 µg/L Evaluated substances without known effects on biological systems.

EGM intervention values: The European Groundwater Memorandum sets intervention values that are half of the corresponding target values set in the ERM for surface water bodies. This is due to time-delay for passage of the unsaturated zone in soils as well as slow due to low flow velocities and poor degradation in groundwater bodies which makes trend reversal difficult.

A higher intervention value of up to 0.5 µg/L in groundwater bodies for an anthropogenic substance can only be accepted for the exceptional case that the substance and its degradation products have been toxicologically fully evaluated, have accordingly no effects, and have additionally been shown not to form critical or non-evaluated transformation products during common drinking water treatment processes.

Major European River Basins show a considerable number of substances that exceeded the ERM target value 2020, often not only in their maximum but even in their mean value. According to EU Primary Law (Art. 191 TFEU) the situation has to be rectified at source by additional efforts by upcoming legislation including the revision of lists of surface and groundwater pollutants.

As new products (esp. industrial chemicals, pesticides, biocides, pharmaceuticals) are constantly entering the EU internal market, a revision of the lists of surface and groundwater pollutants is required every 3 years.

