

Revision of the Drinking Water Directive

A consumer perspective

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ANEC - European Consumer Voice in Standardisation

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DWD Revision



Key concerns:

- **materials in contact with drinking water**
 - proposed standardisation request under CPR
 - ignores a long history of debate on this issue starting in the nineties
 - ignores overwhelming support for regulatory harmonisation expressed by stakeholders
- **emerging pollutants**
- **drinking water quality (taste - smell - colour)**

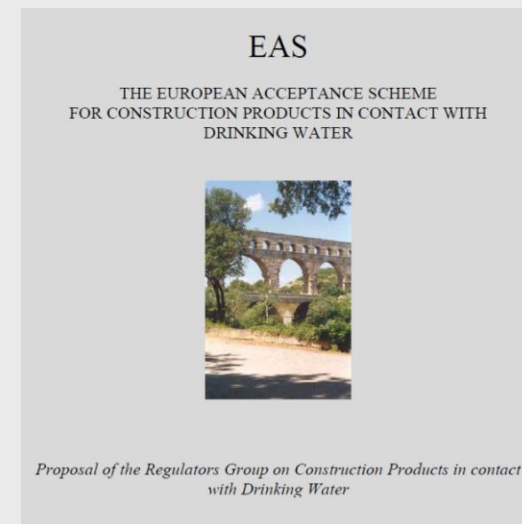


Significant changes are necessary – particularly regarding materials in contact with drinking water!

Materials in contact with drinking water

History:

- Harmonisation of national legislation called for by a broad range of stakeholders for decades!
- **“Regulators Group”** (RG-CPDW) established 1999
- **EAS – “The European Acceptance Scheme for construction products in contact with drinking water” proposal (2005)**
- **EAS finally stopped by the Commission – CPD no legal basis for a harmonisation of rules!**
- **Commission Mandate 2010 (M136) withdrawn**
- **“4-MS initiative”** (GE, FR, NL, UK) 2011 - collaboration to harmonise national rules



Good basis for EU regulation!

Materials in contact with drinking water

Construction Products Regulation (CPR):

- CPR (as the former CPD) **does not aim to establish/harmonise performance requirements!**
- CPR aims to make available performance declarations using harmonised test methods
- **MS to choose the performance levels**



Standards:

- must follow legal framework!
- **cannot harmonise national legislation**
- most inappropriate when approval system needed

Standards cannot replace EU regulation!

Materials in contact with drinking water

Options regulatory framework:

- include a provision in the revised DWD which obliges to Commission to **elaborate regulatory provisions** for the various materials in contact with drinking water **to be inserted in Annexes to the DWD** (suggested by EAS)
- instruct the Commission to go for a **separate piece of regulation** following the example of materials in contact with food
- based on existing schemes
- include time frame for this



Incorporate clear-cut instructions for the Commission!

Emerging pollutants

EDCs, pharmaceuticals, nano, etc.:

- ANEC trusts that the assessments by WHO (special project) have been thoroughly made - no need to include additional thresholds at present
- nevertheless there should be **monitoring obligations**
 - for the **Commission** to review the situation every 5 years
 - for **Member States** when conducting hazard assessments of bodies of water used for the abstraction of water intended for human consumption (Art. 8) or performing a domestic distribution risk assessment (Art. 10)



Include clear-cut monitoring instructions

Quality

Odour, taste, colour:

- prevention of plastic waste is a policy goal
- consumers are advised to drink tap water rather than bottled water to avoid plastic waste
- will not work if consumers perceive the odour, taste or colour of tap water unpleasant
- **removal of colour, odour and taste from Part C of Annex I (indicator parameters) with parametric value “Acceptable to consumers and no abnormal change” and shifting to Annex IV (information) is a step in the wrong direction!**
- broaden scope to include quality requirements



Include organoleptic requirements!

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