



# EUROCITIES statement on the water framework directive, sister directives and floods directive

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Water conservation is essential for quality of life in urban environments. The value of the ‘good water’ status is a considerable part of creating healthy and attractive cities.<sup>1</sup>

The Water Framework Directive (WFD), sister directives and floods directive are instrumental for a healthy freshwater supply to our inhabitants and the protection of our freshwater bodies.

## Our main messages

1. The WFD general objectives and 2027 target, the governance framework and the one-out-all-out principle should be maintained and reaffirmed.
2. The WFD should better reflect the impact of climate change on water resources, and the sustainability challenges faced by cities in water management.
3. The objectives of the WFD should be addressed through an integrated, systemic and holistic approach in order to improve water quality, rather than thinking each pressure element individually. The implementation of the ‘polluter-pays’ principle must be strengthened.
4. The WFD monitoring should include an assessment of measures taken to reduce pressure elements. It should also address emerging pollutants in order to provide a more accurate picture of water quality.

## Upholding the objectives

Since the adoption of the WFD in 2000, water quality in European river basins has improved, even though progress is slow. In the past 15 years, the WFD has ensured greater public engagement in water issues, which is essential to the implementation of the directive. Public awareness on the status of water bodies and the impact of human behaviour on the aquatic environment is higher and stakeholders are encouraged to cooperate under the river basin management plan approach.

We believe that the fundamentals of the directive should remain untouched:

- The WFD general objectives and the target of good water status for all waters should be maintained until 2027. Although the 2027 target is challenging, it helps city authorities address multiple pressures (including pollution from upstream industry or agriculture, discharge of untreated wastewater from storm overflows, contaminated stormwater from industrial land use, roads and urban land use, and morphological alterations); and it also drives investment.

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<sup>1</sup> For instance, the value of water-related ecosystem services such as drinking water quality, clean bathing water, beautiful shorelines, extensive boat-life, rich biological diversity, and angling have been estimated at €250-280 million just to Stockholm.

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- The governance framework should be maintained and extended after 2027. River basin management plans helped city authorities develop local implementation programmes, including information to stakeholders and citizens. We recommend that the 6-year management cycles be continued after 2027.
- The ‘one-out-all-out’ principle should also be maintained. It is needed to target the right pressure element at the right location, as the most affected element affects the status of the entire water body.

## Better reflecting climate change and sustainability issues

- **recognising climate change**

Climate change has an impact on water resource quantity and quality, and affects implementation of the WFD by city authorities. The deterioration of water quality will become a bigger issue at local level due to increasing drought and low flows in rivers, as well as more frequent and intense extreme rain events causing increased runoff and floods. A good ecological and chemical status will depend on the extent of climate change and how it is managed. Climate change impact on water represents one of the most challenging areas for policy coordination. As a result, climate change should be addressed in the WFD as a specific cause of deterioration of water and not as an exceptional circumstance.

- **promoting sustainable and integrated water management at city level**

The WFD should recognise the major role of water in the city and promote integrated water management in urban policies. Water management in cities presents very specific sustainability challenges linked to demographic growth, migratory flows, biodiversity conservation issues, climate change impact. City authorities need to be better involved in the discussions about the implementation of the European water legislation and have a seat at the table in the Common Implementation Strategy (CIS) for these issues to be fully taken into account.

Water management should be guided by only drawing or releasing what can be sustainably taken from or absorbed by the natural environment. Using and reusing different water resources, especially by adapting water treatments to each use by respecting the principle of integrated management of water resource should be reflected in the WFD. This would help foster more sustainable city planning, aiming to anticipate water shortages, extend water lifecycle, and ultimately preserve water resources.

We, as European cities, strive to strike a balance between ambitious environmental objectives, sustainability and urban development. However, there are situations where the terms of the WFD could present challenges to general sustainable urban development. The European Commission should work with member states to reduce unnecessary burdens that could result in the limitation of urban projects of public interest benefitting global water management and water quality.

## Improving coordination with other European policies

The objectives of the WFD should be addressed through an integrated, systemic and holistic approach to improve water quality, rather than thinking each pressure element individually.

- **agriculture and water**

Urban and rural areas are subject to many interdependencies related to the risk of water shortages (increasing uncertainties about water supply due to climate change), high flood risks, and polluted water. The use of water in cities reduces the availability for agriculture, ecosystems and regional development in rural areas and vice versa. In addition, the issue of water quality creates interdependences in terms of pollution from agricultural and from urban run-off, with consequences for both.

The WFD introduced the concept of environmental cost in connection with the polluter-pays principles and the cost recovery for water services, but these are not properly implemented. Member states usually charge the users of the urban water services for expenses that originate from other categories of users and polluters. Managing rural-urban interdependences requires better coordination between cities and their surroundings. The WFD should encourage and support a partnership approach and shared responsibilities between urban and rural areas. The European Commission should better enforce the ‘basic measures’ in the directive to monitor activities that may damage water quality.

Tackling the impact of pesticides in the environment and decreasing pollution from agricultural activities should be more integrated in water legislation, specifically through the WFD. The impact of diffuse pollution should be considered as a pressure.

Supporting changes in agricultural practices, building agricultural partnerships for water quality and city supply are goals that can be achieved by promoting a shift towards a new vision of water for cities.

- **urban planning and water**

The coherence between WFD/sister directives/floods directive should be improved, especially with regards to stormwater management. The current approach to stormwater management has been focused on managing water quantity, to the detriment of water quality. Urban areas often are situated end of pipe in a water body and thus are particularly vulnerable to flooding. A better coherence between the directives is needed to strike a balance between stormwater infiltration and groundwater quality, and to foster measures for better hydro-morphological status upstream (including nature-based solutions).

## A more accurate water quality monitoring

The following elements would enable a better implementation of the WFD:

- **better reflect progress made on water management.**

As the European Environmental Agency noted<sup>2</sup>, member states and city authorities have taken measures to reduce pressures on water bodies but those measures might only result in an improvement of the overall status in the longer term. Including additional indicators reflecting measures taken to reduce pressures such as eutrophication, altered habitats, chemical pollution in the monitoring system would better reflect the actions taken at local level to improve water quality.

- **address pharmaceutical pollution and the cocktail effect**

The WFD should better address the issue of pharmaceuticals and micropollutants in water, and the cocktail effect between chemical elements. In many of our cities, traces of pharmaceuticals are found in the raw-water intake to the municipal water purification plants.<sup>3</sup> Pharmaceutical pollution should be addressed both at source and at end of pipe and the WFD should include this principle to guide future potential European or national legislation.

- **add microbiological parameters to the WFD**

Cities are already monitoring microbiological elements such as bacteria in accordance with the bathing water directive or drinking water directive (E-coli and intestinal enterococci for instance). Those elements should be added to the WFD to better reflect water quality.

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<sup>2</sup> Report European waters, Assessment of status and pressures 2018: <http://bit.ly/2UHy0LO>

<sup>3</sup> In the Baltic region, only nine out of 118 assessed pharmaceuticals released by wastewater treatment plants are removed from wastewater during the treatment processes with an efficiency over 95%, and nearly half of the compounds were removed only partially with an efficiency of less than 50%. Source: EUSBSR, Pharmaceuticals in the aquatic environment of the Baltic Sea region, 2017, <http://bit.ly/2QOLnQg>