



EUROCITIES statement on the Drinking Water Directive

May 2018

With 75% of Europeans living in urban areas, European cities have an important role in the drinking water provision and consumption. As city authorities, we are committed to contributing to the effective implementation of the right for everyone to access essential services of good quality, including water¹, in accordance with the European Pillar of Social Rights. Drinking water supply in European cities is organised in various ways by municipally-owned water companies, in cooperation with private stakeholders, through small community-based networks, or a combination of those. City authorities need to sustainably supply large quantities of drinking water despite increasing environmental and demographic pressures. We believe that the Drinking Water Directive² should primarily focus on clean and safe drinking water provision for all.

We recognise the need to streamline the Drinking Water Directive in line with other water-related legislation, especially the Water Framework Directive, for example regarding water bodies used for drinking water extraction and the related monitoring and reporting requirements.

Increasing citizens' trust in tap water requires shared responsibilities

We welcome the obligation for indoor and outdoor equipment for water provision, infrastructure that is increasingly important in terms of access to water³ and climate change. City authorities already manage free public drinking water infrastructure as well as interactive tools such as online maps or apps to enable citizens to localise them. Identification of optimal locations are already today facilitated by smart metering technology to monitor use rates and times. We must be able to choose locations for drinking water infrastructure that are optimised for our citizens. As maintenance of this infrastructure is costly, the decision of where and how many public fountains are to be installed must remain a local competence. We also appreciate the aim of the directive to improve access to water for all, including vulnerable and marginalised groups but emphasises that identifying these groups should be decided by the competent authority. We are already delivering campaigns to increase citizens' confidence in tap water, including targeted audiences such as children and parents. We believe that the impact of campaigns can be strengthened considerably if campaigns are run at local, national and European level. We recommend that the European Commission ensures their complementarity and coherence through regular coordination.

¹ <https://bit.ly/2heAxT5>

² Directive of the European Parliament and of the Council on the quality of water intended for human consumption (recast), <https://bit.ly/2rZ3p9t>

³ This is particularly important for vulnerable and marginalised groups such as Roma, for whom access to basic services (water, sanitation, electricity and energy) remains a challenge in 14% of cities, according to <https://bit.ly/2GhKJVy>

We support the obligation to provide information to consumers about water-related issues that will help build trust in tap water. To this end, information must be relevant and meaningful for the consumers. We believe that the competent authority should provide this information, based on the definitions used and provided at national level, to increase transparency in the drinking water sector.

We also recommend that the competent authority performs an assessment in cases where parametric values are exceeded for water quality to determine if there is a danger to human health. Automatically declaring any excess as a threat to human health risks leading to unnecessary warnings to consumers, counteracting the ambition to build trust and confidence in tap water.

Monitoring requirements need to be based on local circumstances

We support the risk-based approach introduced by the new proposal, with additional monitoring requirements. As water quality depends on local circumstances, we recommend that the extent and frequency of monitoring should be based on risk assessments from water suppliers. While we are fully committed to meeting the directive's requirements, sufficient monitoring capacity and equipment may not be available in all our cities in the short term and will require substantial investments. We therefore recommend a six years transition period for all water suppliers to carry out the supply risk assessment.

Safe drinking water provision requires additional guidance

We consider health and safety as the top priority for drinking water and this should remain the main guiding principle when it concerns materials in contact with drinking water. We believe that it is necessary to introduce clearer guidance on suitable materials in drinking water production and distribution networks through the Drinking Water Directive, with the primary concern of guaranteeing the health and safety of our citizens drinking water.

The new proposal for the Drinking Water Directive does not specify if domestic hot water is regarded as drinking water, which leaves uncertainty in how the directive should be applied and if material for hot water distribution is included. We believe that safety issues in the hot water supply, which is not primarily intended for human consumption, should be considered under the domestic distribution risk assessment and these be carried out by the building owners.

Building owners should be responsible for domestic distribution

We support the inclusion of a domestic distribution risk assessment, which will provide better control of risks associated with the domestic distribution systems. However, it is not feasible for cities to inform consumers in private buildings of possible or actual risks due to very limited access to information regarding domestic infrastructure and its maintenance.

We can guarantee clean and safe drinking water in our distribution network but possible health hazards in the domestic distribution are outside of our control. These hazards can originate either from lack of maintenance within the building, choice of material in contact with drinking water, lack of or malfunctioning operational routines (e.g. insufficient heating of water to avoid legionella). None of these hazards are under the control of city authorities. A domestic distribution risk assessment therefore needs to be carried out by the building owner. The Drinking Water Directive should contain clear guidance on how this obligation to building owners is operationalised.