



EEB's main priorities on the Blueprint to Safeguard Europe's Water

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1. Improving enforcement – tackling exceptions and delays

The implementation of the Water Framework Directive (WFD) is fundamentally undermined by the wide-spread use of exemptions and the possibility given to Member States to postpone measures until 2027. As a consequence, **exemptions and postponing has become the norm under the WFD.**

Therefore most of us who read this position paper might see their hairs turning grey before the WFD delivers its benefits to society.

The European Commission should be given more resources to handle the misuse of delays and exemptions by Member States. It should be able to analyse if delays and exemptions are granted or not and strictly enforce if this opportunity is misused. We expect the **European Commission to significantly improve its enforcement action** on the WFD (inspections, surveillance and legal action) to make it work and to achieve the improvement of Europe's waters in our lifetime. **EEB calls for a new Directive as well as the establishment of an EU inspectorate to better enforce environmental legislation, including the WFD.**

2. Save European freshwater biodiversity from infrastructure damage

We are witnessing a freshwater biodiversity crisis in Europe today: according to the European Red List and to analyses of the European freshwater fishes dataset published in November 2011, 37% of European freshwater fish species (and 40% of freshwater molluscs) are considered threatened¹.

Thus we believe that there is an **extremely limited potential for building new hydropower plants** in the EU. The remaining free-flowing and unregulated river stretches of Europe should be **protected for their ecological/biodiversity potential**. Europe should make significant efforts to **restoring past damage** by dams and other river infrastructure.

Sustainable use of renewable energy must be combined with ambitious energy efficiency objectives, to ensure that new renewable production does not contribute to a growing overall energy demand. To achieve this, **a binding energy reduction target** in the framework of the Energy Efficiency Directive should be agreed. Secondly, **planning and prioritization should take place on high level** and take biodiversity and energy objectives fully and equally into account. Thirdly, **energy efficiency and energy saving should be prioritized** everywhere over building new capacity. Especially in cases where the damage to biodiversity caused by new plants would be unacceptable, energy efficiency and saving should be prioritized.

¹ Freyhof, J. and Brooks, E.: European Red List of Freshwater Fishes. Luxembourg: Publications Office of the European Union. 2011

Fourthly, the Commission, as a guardian of the Treaties has **to ensure countries comply fully not only with energy but also with biodiversity legislation and respective politically agreed objectives**. The sustainability of hydropower projects has to be assessed in light of the damage that it causes to aquatic ecosystems and to the environmental and the social and economic costs it entails. Here in particular, a **much stricter application of existing legislation, especially Art. 4.7 WFD** is necessary. The EC must insist that member states fully document and prove that no energy saving or generating alternatives exist and be willing to challenge member states on their alternative energy options considered when it puts in question biodiversity objectives and water protection. If a new damaging development could be made redundant by increasing energy efficiency, energy saving or another, environmentally friendlier alternative, this has to be enforced.

EEB thinks that the sustainability of **developing inland navigation** has to be assessed including all ecologic and socio-economic aspects and costs. It is possible to improve inland navigation sustainably if the ecological integrity of the river waterway is respected.

3. Climate change – mainstream ecosystem based adaptation and mitigation and establish environmental flow regime

Climate change is already heavily impacting in Southern Europe but effects are felt more keenly over large parts of Europe. EEB believes the following basic principles are essential to effectively fight climate change:

- Improve implementation of existing environmental legislation (e.g. WFD, Birds and Habitats Directives) to increase ecosystem resilience
- Take a holistic approach and integrate climate and environment aspects in the wider land use planning
- Mainstream ecosystem-based climate change adaptation and mitigation in all relevant policies

The focus should be on holistic solutions, non-technical adaptation and prevention through good planning. We need to reduce unsustainable water demand and stop increasing water demand where there is already little water left. Water need and supply should be at many places in Europe re-defined based on social and ecological standards as establishing water efficiency standards might not be enough if water use is excessive.

Spatial planning and Green Infrastructure: rural space use must be adapted to the possibilities of the existing and future water availability (**'function follows water'**), so wasting water is replaced by more sustainable land use that conserves water resources. It is well documented by now, that integrated spatial measures often provide a better solutions to climate change than technological ones. They increase the resilience of water bodies and aquatic ecosystems and contribute to rural development. They contribute to natural water purification and ecological infrastructure for biogeographical adaptation of climate sensitive species and ecosystems. Near to urbanized areas they offer new possibilities for

recreation and improve the business climate and therefore the conditions for economic development. Some examples of natural based climate solutions proved to be much cost effective and more sustainable than traditional civil engineering².

Developing guidance in the field of water and wetland management as a sectoral contribution to the **EU Green Infrastructure Strategy** is therefore very much needed. The new Green Infrastructure Strategy should include **binding EU level targets on soil sealing to avoid increasing flood risk. Ecosystem based adaptation and mitigation should be mainstreamed in EU funding.** The Commission has to ensure that this guidance impacts the next cycle river basin management plans 2016-2021.

It is of paramount importance that such strategies are efficiently financed through the EU Budget (especially the Cohesion Policy and CAP) and national funds. Furthermore natural water safety and retention measures should be assessed as standard **compulsory alternatives** in the designing and administrative permit process³. This should be included during the **2012 review of the Environmental Impact Assessment Directive.**

MS and the Commission should ensure that climate change **mitigation and adaptation measures that have a negative effect** on reaching the objectives of water and nature legislation and further decrease resilience of ecosystems (“wrong answers”) **are efficiently prevented.** In line with this, EEB is against the establishment of a draught emergency fund because emergency funds are often spent in a manner not coherent with existing EU legislation.

EEB supports the development of a CIS guidance to support the use of water accounting and Environmental flows at river basin level and the development of a **binding efficiency targets.** Later, when enough experience is available, **WFD technical annexes or daughter directive on Environmental flows** should be adopted. Environmental flows definition and implementation shouldn't be restricted to water-stressed basins only but made **compulsory everywhere.** It would be important to consider **strategic groundwater reserves for drinking water supply** and strategic economic instruments to switch to desalted water when necessary. This new legislation should ensure that existing water uses and rights are revised after targets and E-flows are set.

EEB supports the introduction of **mandatory labelling and minimum water efficiency requirements of water using appliances and buildings and for irrigation equipment,** as well. We also support the elaboration of a **Directive on water efficiency in buildings.**

However introducing effective pricing is the most important instrument to foster innovation and achieve technological change. Economic incentives trigger innovation (e.g. water saving appliances, toilets and washing machines, metering etc.) and foster the widespread use of such new technologies and services. Thus

² Naturally Safe: climate buffers in practice. Working together on water defense systems. December 2011. Dutch Coalition Natural Climate Buffers, www.klimaatbuffers.nl. Also: www.ecoshape.org.

³ Delta Programme 2012. Working on the delta. Acting today, preparing for tomorrow. Publication of the Dutch Government. Also: www.deltacommissaris.nl/english/topics/.

the better use of economic instruments (tariffs, incentive pricing) to achieve efficient sustainable water allocation should be strengthened. In severely water-stressed areas a **compulsory draught insurance system** for farmers and other water-intensive industries should be established.

4. Make water economics work better

Only **the application of a wide definition of water services and the full application of effective water pricing** would avoid households across Europe making a disproportionate contribution to Europe's water management. Member States have to apply economics in the second cycle of RBMPs much better and the Commission has to support them in this regard.

In light of the pressures put on Europe's water resources particularly through agriculture, energy production and navigation, it is paramount that both EU and national governments **assess and revise harmful subsidies** in a number of policy fields. There is a need to develop and introduce further economic instruments to reduce environmentally detrimental activity and incentivize more sustainable use of water resources. **Taxing environmental 'bads'** will reduce the risk of unintended subsidisation of environmentally harmful alternatives, as well as reduce the need for public funding⁴.

Since 2011, the EU has developed the **European Semester** as a new mechanism for coordinating national economic reform efforts. Although not binding in nature, the European Semester can create a powerful support for the accelerated introduction of effective water pricing instruments at Member States level. For example the 2011 Country Recommendation for Cyprus includes a point on water pricing. The future cycles of the European Semester should make such recommendations systematically to all EU member states.

Through strict enforcement the EU should ensure that **large budget cuts** that were introduced due to the economic crisis **doesn't adversely affect the implementation of nature and water legislation** and that EU objectives are met as much as possible despite economic crisis.

Living rivers and lakes provide a wide array of important ecosystem services of great economic value for society. However so far there wasn't enough attention given to **estimate the improvement in socio-economic benefits which would result of implementing the WFD**. Hence, these benefits are not widely known. A thorough cost-benefit analysis is often missing from RBMPs, too which often creates the impression that WFD implementation is disproportionately costly. An assessment of the benefits of implementing RBMPs on national and European levels should be carried out. Member States and the EU should devote more resources to communicating the socio-economic benefits of better water protection towards the general public. Furthermore, **improved cost-benefit analysis** should be part of second cycle of RBMPs and of any infrastructure or development project affecting water.

⁴ OECD (2008): An OECD Framework for Effective and Efficient Environmental Policies. Meeting of the Environment Policy Committee (EPOC) at Ministerial Level. Environment and Global Competitiveness. 28-29 April 2008.

5. Reform the CAP to support sustainable use of water in agriculture

Agricultural diffuse pollution with nutrients and pesticides is a major problem in nearly all European river basins. **The cost** of removing nutrients and pesticides from drinking water **is passed onto the individual customer** through the water bill, while farmers are asked to contribute only little or nothing at all.

Furthermore, irrigation for agriculture is often causing the over-abstraction of surface and ground waters, with disastrous ecological effects.

It is clear, that only **a thorough reform of the CAP could provide a solution** to the above challenges. CAP should stop subsidizing farming practices that contribute to surface and groundwater pollution and depletion of scarce water resources. In times of budgetary pressures we need to ensure that **public money supports public goods**. This has to start with **the inclusion of the Water Framework Directive** and the Sustainable Use of Pesticide Directive in **Cross Compliance**. In the framework of this, CAP support should be made conditional on **water metering and pricing for farmers**.

Then, to make sure that the CAP effectively supports those who farm sustainably and maintain high quality and quantity of water resources, the proposed **pillar I greening** component has to be maintained and translated into a strong and compulsory package of good agronomic practices (crop rotation, 10% ecological Focus Areas and maintenance of permanent pastures). Additionally **Pillar II** needs to be **sufficiently funded** and there should be a minimum spending for agri-environmental measures.

Wetlands are indispensable for nutrient reduction in Europe's river basins and seas. Wetlands have proven to be highly cost-effective in tackling agricultural pollution and provide a range of wider ecosystem benefits (climate mitigation, biodiversity). Therefore the **maintenance of new GAEC 7 on the protection on wetlands and carbon rich soils** is of high importance. **CAP should support the establishment of new wetlands** in the agricultural landscape through agri-environmental programs.

Enlargement of irrigation areas shouldn't be supported by CAP in water-stressed areas and only under specific circumstances in future water-stressed areas. CAP should support the transition to a changing climate: the change of crops, production patterns and practices. This means solutions that are adapted to local ecological circumstances rather than costly technological solutions.

You can download the full position at www.eeb.org

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