



RIWA

ARW

AWBR

IAWR Position on

River Basin Management Plan for the Rhine Part A, Coordinated Part

Cologne, June 16, 2009

Demands for renaturalization to improve the chemical quality of the water

We are glad to take this opportunity to state our standpoint within the framework of the public participation in the coordinated drafting of the River Basin Management Plan for the international Rhine catchment area, Part A, Coordinated Part, and complement the contributions we have made in the working bodies of the ICPR as well as the Information Event for the waterworks associations held by the German Ministry for the Environment, Conservation of Nature and Reactor Safety on May 11, 2009 in Bonn.

The IAWR member associations ARW, AWBR and RIWA will present detailed standpoints at regional levels. For this reason, this reaction is limited to general points.

We wish to refer to our memoranda:

- Groundwater Memorandum 2004
- Vienna Declaration 2005 (Demands by the waterworks regarding the implementation of the European Water Framework Directive)
- Danube, Meuse and Rhine Memorandum 2008

Each memorandum sets out and justifies our standpoints regarding how the European Water Framework Directive should be approached and implemented, as well as our expectations and demands.

We remain fully behind these documents.

Any proposed River Basin Management Plan must take into account that the European Water Framework Directive promotes the good ecological quality of bodies of water.

The waterworks along the Rhine support this demand for ecologically intact waters, because it entails the reduction of anthropogenous contamination through renaturalization to achieve non-critical trace concentrations of less than 0.1 µg per litre.

This demand is also included in the Danube, Meuse and Rhine Memorandum 2008, which we are including as an annex along with the other two memoranda mentioned above.

The good ecological quality objectives are (like the morphological objectives) directed towards achieving the original state unaffected by human activities. In other words, the objective is renaturalization.

The achievement of this objective in terms of the physical and chemical state of the water is a prerequisite to the implementation of the European Water Framework Directive leading to the necessary advances in the protection of bodies of water.

Chemical quality objectives must, therefore, also take into account the highly sensitive production of safe drinking water. Here, article 1, article 7 paragraph 3 as well as article 11 paragraph 3 of the European Water Framework Directive are particularly relevant.

On examination of the River Basin Management Plan, Part A, in the light of the subsidiary and related directives that are now known, as well as other political actions on the European level (in particular the European Directive on Environmental Quality Standards in relation to Water Management, as well the Groundwater Directive, but also the lack of consideration of Water Management in the restructuring of the European agricultural policy (cross-compliance) and the future policy towards pesticides) the IAWR member waterworks have serious doubts whether the described measures are capable of actually and sustainably reducing the treatment required for the production of drinking water (as specified as an objective in article 7, paragraph 3) so that natural processes such as bank and sand filtration are sufficient on their own.

According to article 11, paragraph 3, point d of the Water Framework Directive, the "basic measures" of a programme of measures should include: "measures to meet the requirements of Article 7, including measures to safeguard water quality in order to reduce the level of purification treatment required for the production of drinking water."

The relevant statements in the draft text do not make evident that this objective has been dealt with thoroughly in a systematic, fundamental and comprehensible way. It is possible, therefore, that a formal evaluation could come to the conclusion that, in relation to this very important point, the requirements of the European Water Framework Directive have not been taken into account and hence correction is called for.

In view of the assurances we were given at the Information Event for the waterworks associations held on 11 May 2009 that all (!) the articles named in the European Water Framework Directive would be taken into account in the planning of measures and drafting of River Basin Management Plans, we expect that the final implementation of the measures will lead to the actual achievement of the objectives, especially those stated in articles 7 and 11, which are very important to us.

We would like, therefore, to repeat again the demands we have repeatedly stated and also set out in the memoranda listed above. We request that you take these into account in the implementation of the European Water Framework Directive to the benefit of around 30 million people, who are dependent on the good quality of the Rhine water.

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