



Comment of the European Water Association on the

Communication from the Commission to the European Parliament and the Council Developing a New Bathing Water Policy COM(2000) 860 final, 21/12/2000

The European Water Association (EWA) is pleased to hand in its comments on a new bathing water policy as presented by the European Commission, DG ENV. The EWA welcomes the revision of the Council Directive 76/160/EEC and would be grateful to be kept involved in the ongoing discussion of this review.

The suggestions of the EWA concern the following points:

Analyses

The EWA welcomes the intention to homogenise the analysis methods. The proposed way of linking this to a CEN or ISO standard seems to be the best way to guarantee comparable analyses without prescribing detailed technology and hampering technological development.

Parameter

The consideration of algae is a wise step to reduce potential health risks of bathers. The use of *nutrient parameters* to assess the actual health risk related to algae seems however questionable. Due to certain weather conditions, wind, current, and geography of the bathing water (form of the bay etc.) sudden amassments of algae can occur although the nutrient situation might not have worsened. This parameter therefore does not seem adequate for an assessment of actual health risks.

It is certainly of use to understand the reasons for algae pollution. This assessment however does not need a fortnightly or even weekly analysis as intended for the microbiological parameters. An algae protocol seems nevertheless useful; a possible parameter could be the measuring of microcystines on suspicious locations.

Co-ordination with the Water Framework Directive

The Communication to the European Parliament and the Council indicates strong relations between the protection of bathing water and the Water Framework Directive. Especially the intended "beach profile", necessary for the bathing water management, could overlap with the information gathered for the River Basin Management Plans. Any double work should definitely be avoided.

Experts for bathing water quality should be involved in the Working Groups that were set up for the implementation of the Water Framework Directive, e.g. concerning the guidance on classification and reference conditions of surface, coastal and transitional waters, monitoring, and best practices in river basin management.

Promote a good bathing water quality management

It is very important for the new directive to urge on a good management of waste water systems (included storm water overflows) and best practices to carry out sewer network and waste water treatment plant (good points of discharge, good treatment level, possibly treatment of storm water overflows...)

Gathering and publication of more information

An exchange of best practices in the field of bathing water protection should be organised and encouraged, e.g. concerning the information of the public which is needed in order to allow each person to choose the best place for bathing.. Several Member States have already gathered experience in this field.

More information also has to be provided concerning costs and benefits of additional measures for the improvement of bathing water quality.

Differentiation between long-term and short-term quality compliance

There is a big difference between long-term development of the quality in a bathing area and short-term deterioration. The EWA therefore welcomes the intention to take into account the long-term trend in bathing water quality. This will avoid that radical measures have to be taken on the basis of only one bad sample.

More clarification needed

The Communication remains quite vague concerning a number of points. To allow an adequate discussion of the intended policy, more detailed information is necessary concerning the following points:

- Schedule for the implementation, especially concerning the intended beach profiles.
- Clarification of the term "manager of a beach".
- Will the system of guide and mandatory values be continued?
- How will the necessary linkages to other directives like the Nitrates and the Urban Waste Water Directive be made?

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