

Public Consultation to inform the Fitness Check of the EU Water Framework Directive, its associated Directives (Groundwater Directive and Environmental Quality Standards Directive) and the Floods Directive

A Eurelectric response paper

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:

- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

Dépôt légal: D/2019/12.105/7

WG Hydro
WG Environmental Protection
WG Thermal & Nuclear

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Fields marked with * are mandatory.

Introduction

The Water Framework Directive carries a mandatory obligation to review the functioning of the Directive against its aims by the end of 2019. The European Commission will also evaluate the two Directives directly linked to the Water Framework Directive: the Groundwater Directive and the Environmental Quality Standards Directive, the so-called "daughter-directives" of the Water Framework Directive.

While the Floods Directive does not carry such an obligation, its close alignment with the Water Framework Directive means it is also appropriate to consider this legislation at the same time.

Following the [Better Regulation Guidelines](#), the evaluation of the above directives will take the form of a Fitness Check, which aims to provide a comprehensive policy evaluation assessing whether the current regulatory framework is 'fit for purpose'.

The purpose of this consultation is to collect information and views from stakeholders about the policies covered by this Fitness Check. The consultation is sub-divided into three parts:

After some general information about the respondent, the first part of the questionnaire is addressed to the general public. To respond to this part of the questionnaire, you do not need any specialist knowledge of legislation or water policy. The second part is addressed to experts and contains more detailed and technical questions regarding the EU water legislation.

You are welcome to provide your input to parts (i) and/or (ii) according to your level of knowledge and involvement in water policies. All of the responses to this consultation will be fully assessed and the overall results will be included in the analysis supporting the Fitness Check of the Water Framework Directive, the Groundwater Directive, the Environmental Quality Standards Directive, and the Floods Directive. A stand-alone summary of the results of the consultation will be produced (and will be published [here](#)).

The [public consultation on the evaluation of the Urban Wastewater Treatment Directive](#) was launched on

13 July and will be open to contributions until 19 October.

If you have any questions, please contact the European Commission via env-water@ec.europa.eu

Once you have submitted your answers you can download a copy of them.

Your opinion matters and we are grateful to you for taking the time to complete the questionnaire.

For more information about the Fitness Check, please see the European Commission's website: http://ec.europa.eu/environment/water/fitness_check_of_the_eu_water_legislation/index_en.htm

Introduction to water and European water legislation

Water is an intrinsic part of life and a key resource utilised for a wide variety of purposes on a daily basis. Its uses include energy production, industry, agriculture and food processing, transport, and tourism and hospitality, as well domestic uses. It also forms an important part of our natural environment supporting important ecosystems. In addition to ensuring the protection of water for users and the wider environment, the management of water is becoming increasingly important in the protection of people, the economy, cultural heritage and the environment itself, from flooding.

The EU has shared competence with Member States to regulate environment and health in the field of water. This means that the EU can only legislate as far as the Treaties allow it, and with due consideration for the principles of subsidiarity and proportionality. EU-level action on water management is justified because 60% of EU river basins are international, shared by up to 19 countries (Danube); action taken by a single or few Member States is therefore not sufficient.

The [Water Framework Directive](#) (WFD - 2000/60/EC) was adopted in 2000 with the key aims of protecting and enhancing water bodies for current and future generations of EU citizens. The adoption of the Water Framework Directive brought a new integrated approach that altered the way water is managed across the EU and by the individual national authorities. The new approach incorporated into a legally binding instrument the key principles of integrated river basin management: public information and the participatory approach in planning and management at river basin scale, including co-operation between neighbouring countries; the consideration of the whole hydrological cycle and all pressures and impacts affecting it; and the integration of economic and ecological perspectives into water management. It emphasised the need to gather, use and share information on the ecology and pollution of rivers, lakes, transitional and coastal waters, and on the qualitative and quantitative status of groundwaters.

The Water Framework Directive repealed a number of earlier pieces of legislation which dealt with key issues as isolated topics, bringing them together in a comprehensive framework.

The obligations set out under the Water Framework Directive led to the need for what are known as 'daughter Directives', expanding upon key topics to provide further instruction on how to comply with the aims of the Water Framework Directive. These are namely the [Groundwater Directive](#) (2006/118/EC) published in 2006, aimed at protecting groundwater from pollution and over exploitation, and the [Environmental Quality Standards Directive](#) (2008/105/EC) adopted in 2008, aimed at protecting surface waters from contamination by priority chemical pollutants.

Additionally, in 2007, the [Floods Directive](#) (2007/60/EC) was adopted with the aim of reducing and

managing the risks that floods pose to human health, the environment, cultural heritage and economic activity. The Directive applies to inland waters as well as all coastal waters across the whole territory of the EU. Member States are required to adopt Flood Risk Management Plans identifying the significant flood risks and measures to be applied. Their development is coordinated with that of the River Basin Management Plans.

The Water Framework Directive, its daughter Directives and the Floods Directive have now been in place for more than a decade, their implementation supported by the [Common Implementation Strategy](#) involving the European Commission and a large network of Member State and stakeholder group representatives (from EU-level associations, business groups, NGOs, etc.).

The EU freshwater policy has already been subject to a [Fitness Check adopted in 2012](#), which included the assessment of the first River Basin Management Plans in accordance with Water Framework Directive.

This Fitness Check on water policy will be closely coordinated with the [evaluation of the Urban Waste Water Treatment Directive](#). The [Drinking Water Directive](#) was evaluated recently (2017) and the proposal for a revised Directive is currently under discussion with the Council and the Parliament. Other water-related Directives are not directly part of this evaluation, including the [Bathing Water Directive](#) (evaluation foreseen for 2020) and the [Marine Strategy Framework Directive](#) (to be reviewed by 2023).

For more information about water policy in Europe, please check out these websites:

The European Commission's website on water in Europe:

http://ec.europa.eu/environment/water/index_en.htm

The European Commission's website about the Water Framework Directive:

http://ec.europa.eu/environment/water/water-framework/info/intro_en.htm

The European Commission's website about the Floods Directive:

http://ec.europa.eu/environment/water/flood_risk/index.htm

The European Commission's Implementation Reports:

http://ec.europa.eu/environment/water/water-framework/impl_reports.htm

The European Environment Agency report on "European Waters: Assessment of status and pressures 2018"

<https://www.eea.europa.eu/publications/state-of-water>

The European Environment Agency's Pollutant Release and Transfer Register (E-PRTR), which includes information on chemical emissions to water:

<http://prtr.eea.europa.eu>

About you

* Language of my contribution

- Bulgarian
- Croatian
- Czech
- Danish
- Dutch
- English
- Estonian

- Finnish
- French
- Gaelic
- German
- Greek
- Hungarian
- Italian
- Latvian
- Lithuanian
- Maltese
- Polish
- Portuguese
- Romanian
- Slovak
- Slovenian
- Spanish
- Swedish

* I am giving my contribution as

- Academic/research institution
- Business association
- Company/business organisation
- Consumer organisation
- EU citizen
- Environmental organisation
- Non-EU citizen
- Non-governmental organisation (NGO)
- Public authority
- Trade union
- Other

* First name

Martin

* Surname

Schoenberg

* Email (this won't be published)

mschoenberg@eurelectric.org

* Organisation name

255 character(s) maximum

Eurelectric aisbl (The Union of the Electricity Industry - Eurelectric)

* Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

Transparency register number

255 character(s) maximum

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

4271427696-87

* Country of origin

Please add your country of origin, or that of your organisation.

- | | | | |
|---|---|--|--|
| <input type="radio"/> Afghanistan | <input type="radio"/> Djibouti | <input type="radio"/> Libya | <input type="radio"/> Saint Pierre and Miquelon |
| <input type="radio"/> Åland Islands | <input type="radio"/> Dominica | <input type="radio"/> Liechtenstein | <input type="radio"/> Saint Vincent and the Grenadines |
| <input type="radio"/> Albania | <input type="radio"/> Dominican Republic | <input type="radio"/> Lithuania | <input type="radio"/> Samoa |
| <input type="radio"/> Algeria | <input type="radio"/> Ecuador | <input type="radio"/> Luxembourg | <input type="radio"/> San Marino |
| <input type="radio"/> American Samoa | <input type="radio"/> Egypt | <input type="radio"/> Macau | <input type="radio"/> São Tomé and Príncipe |
| <input type="radio"/> Andorra | <input type="radio"/> El Salvador | <input type="radio"/> Madagascar | <input type="radio"/> Saudi Arabia |
| <input type="radio"/> Angola | <input type="radio"/> Equatorial Guinea | <input type="radio"/> Malawi | <input type="radio"/> Senegal |
| <input type="radio"/> Anguilla | <input type="radio"/> Eritrea | <input type="radio"/> Malaysia | <input type="radio"/> Serbia |
| <input type="radio"/> Antarctica | <input type="radio"/> Estonia | <input type="radio"/> Maldives | <input type="radio"/> Seychelles |
| <input type="radio"/> Antigua and Barbuda | <input type="radio"/> Ethiopia | <input type="radio"/> Mali | <input type="radio"/> Sierra Leone |
| <input type="radio"/> Argentina | <input type="radio"/> Falkland Islands | <input type="radio"/> Malta | <input type="radio"/> Singapore |
| <input type="radio"/> Armenia | <input type="radio"/> Faroe Islands | <input type="radio"/> Marshall Islands | <input type="radio"/> Sint Maarten |
| <input type="radio"/> Aruba | <input type="radio"/> Fiji | <input type="radio"/> Martinique | <input type="radio"/> Slovakia |
| <input type="radio"/> Australia | <input type="radio"/> Finland | <input type="radio"/> Mauritania | <input type="radio"/> Slovenia |
| <input type="radio"/> Austria | <input type="radio"/> Former Yugoslav Republic of Macedonia | <input type="radio"/> Mauritius | <input type="radio"/> Solomon Islands |
| <input type="radio"/> Azerbaijan | <input type="radio"/> France | <input type="radio"/> Mayotte | <input type="radio"/> Somalia |
| <input type="radio"/> Bahamas | <input type="radio"/> French Guiana | <input type="radio"/> Mexico | <input type="radio"/> South Africa |
| <input type="radio"/> Bahrain | <input type="radio"/> French Polynesia | <input type="radio"/> Micronesia | <input type="radio"/> South Georgia and the South Sandwich Islands |
| <input type="radio"/> Bangladesh | <input type="radio"/> French Southern and Antarctic Lands | <input type="radio"/> Moldova | <input type="radio"/> South Korea |
| <input type="radio"/> Barbados | <input type="radio"/> Gabon | <input type="radio"/> Monaco | <input type="radio"/> South Sudan |

- Belarus
- Belgium
- Belize
- Benin
- Bermuda
- Bhutan
- Bolivia
- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Cocos (Keeling) Islands
- Colombia
- Comoros
- Congo
- Cook Islands
- Costa Rica
- Côte d'Ivoire
- Croatia
- Cuba
- Georgia
- Germany
- Ghana
- Gibraltar
- Greece
- Greenland
- Grenada
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Japan
- Jersey
- Jordan
- Kazakhstan
- Kenya
- Kiribati
- Kosovo
- Kuwait
- Kyrgyzstan
- Mongolia
- Montenegro
- Montserrat
- Morocco
- Mozambique
- Myanmar/Burma
- Namibia
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- North Korea
- Northern Mariana Islands
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Philippines
- Pitcairn Islands
- Poland
- Portugal
- Puerto Rico
- Qatar
- Réunion
- Romania
- Russia
- Rwanda
- Spain
- Sri Lanka
- Sudan
- Suriname
- Svalbard and Jan Mayen
- Swaziland
- Sweden
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States
- United States Minor Outlying Islands
- Uruguay
- US Virgin Islands
- Uzbekistan
- Vanuatu
- Vatican City
- Venezuela
- Vietnam
- Wallis and Futuna

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| <input type="radio"/> Curaçao | <input type="radio"/> Laos | <input type="radio"/> Saint Barthélemy | <input type="radio"/> Western Sahara |
| <input type="radio"/> Cyprus | <input type="radio"/> Latvia | <input type="radio"/> Saint Helena
Ascension and
Tristan da Cunha | <input type="radio"/> Yemen |
| <input type="radio"/> Czech Republic | <input type="radio"/> Lebanon | <input type="radio"/> Saint Kitts and Nevis | <input type="radio"/> Zambia |
| <input type="radio"/> Democratic Republic
of the Congo | <input type="radio"/> Lesotho | <input type="radio"/> Saint Lucia | <input type="radio"/> Zimbabwe |
| <input type="radio"/> Denmark | <input type="radio"/> Liberia | <input type="radio"/> Saint Martin | |

*** Publication privacy settings**

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

Anonymous

Only your type, country of origin and contribution will be published. All other personal details (name, organisation name and size, transparency register number) will not be published.

Public

Your personal details (name, organisation name and size, transparency register number, country of origin) will be published with your contribution.

* I agree with the [personal data protection provisions](#)

Part I – General public questionnaire

All of the questions in this part of the consultation are multiple-choice questions. However, there is also the opportunity to make more in-depth comments or upload additional documents at the end of this section if you wish.

Your understanding of water and your relationship with it

1. How do you assess the situation of Europe's waters today?

- Good
- Acceptable
- Not good
- I do not know

To enjoy a clean environment and clean waters careful management is needed of how water is used. This first question seeks to understand your relationship with water, your views and opinions on water issues, and your priorities.

2. When you think of water and its different uses and functions, which of the following do you consider as a priority?

	High priority	Medium priority	Low priority	No priority	I do not know
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Protection of drinking water sources and the supply systems	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Protection of water from pollution	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Availability of drinking water and water for domestic use	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Availability of water for irrigation in agriculture	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Availability of water for industry	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Availability of water for recreation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Availability of water for transport purposes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Availability of water for energy production	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Protection of natural waters and their associated ecosystems	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Prevention and protection from flooding	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other, please specify:

Management of water resources

3. Do you feel that water is presently managed and used sustainably?

- Yes
 No
 I do not know

4. Do you know where to find up to date information on the quality of surface and groundwater in your region/country?

- Yes
 No

If yes, where do you access such information?

- Online
 Regional or local authorities' offices
 Other

5. Are you aware of which authorities manage the surface and groundwater in your region?

- Yes
 To some extent

- No
- I do not know

6. Do you think the management of water resources in your country has improved since the introduction of the Water Framework Directive (2003) and the Floods Directive (2009)? Note that these are the dates these Directives were transposed into national legislation.

- Yes, to a large extent
- Yes, to some extent
- No, it has stayed the same
- No, it has got worse
- I do not know

7. Do you think the quality of surface and groundwater in your country or region has improved since the introduction of the Water Framework Directive?

- Yes, to a large extent
- Yes, to some extent
- No, it has stayed the same
- No, it has got worse
- I do not know

8. Which of the following do you consider to be challenges to achieving good qualitative and/or quantitative status of surface/groundwater? (please give each issue a score between 5 and 1, where 5 =very significant obstacle, 4 = major obstacle, 3 = moderate obstacle, 2 = slight obstacle, 1 = not an obstacle. All issues should be scored if possible, but "Do not know/no opinion" may also be chosen).

Quantitative aspects

	1 (Not an obstacle)	2 (Slight obstacle)	3 (Moderate obstacle)	4 (Major obstacle)	5 (Very significant obstacle)	Do not know / No opinion
Growing demand for drinking water / increasing population	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Growing demand for water in energy production, industry and agriculture	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Growing demand for water in industrial activities	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Growing demand for water for irrigation in agriculture	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

<p>Intensified droughts (leading to decrease in water availability) resulting from climate change</p>						
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Pollution of water

	1 (Not an obstacle)	2 (Slight obstacle)	3 (Moderate obstacle)	4 (Major obstacle)	5 (Very significant obstacle)	Do not know / No opinion
Pollution of water from use of pesticides in agriculture	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pollution of water by nutrients from:	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(a) urban and industrial waste water treatment plant effluents;	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(b) agricultural use of fertilisers and manure	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Heavy-metal pollution from any source, including historical mining	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Persistent pollution by organic chemicals now banned in the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Emerging contaminants (e.g. microplastics, pharmaceuticals)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(a) microplastics	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
(b) pharmaceuticals	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
(c) other emerging pollutants	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inadequate regulation of pollution emissions	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Biodiversity

	1 (Not an obstacle)	2 (Slight obstacle)	3 (Moderate obstacle)	4 (Major obstacle)	5 (Very significant obstacle)	Do not know / No opinion
Negative impact on aquatic ecosystems	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Negative impact on terrestrial ecosystems that are water-dependent	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Infrastructure development

	1 (Not an obstacle)	2 (Slight obstacle)	3 (Moderate obstacle)	4 (Major obstacle)	5 (Very significant obstacle)	Do not know / No opinion
Physical changes to water bodies (e.g. river straightening, dam construction, flood protection, mining)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sewage system under-capacity (leading to overflow)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inadequate or limited reservoir storage (irrigation, energy generation, etc.)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Leaking drinking-water supply networks	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Water abstraction

	1 (Not an obstacle)	2 (Slight obstacle)	3 (Moderate obstacle)	4 (Major obstacle)	5 (Very significant obstacle)	Do not know / No opinion
Illegal or unregulated abstraction	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regulated but unsustainable extraction rates	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Low abstraction fees (encouraging wastefulness and /or failure to collect/reuse water)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Other

	1 (Not an obstacle)	2 (Slight obstacle)	3 (Moderate obstacle)	4 (Major obstacle)	5 (Very significant obstacle)	Do not know / No opinion
Other #1	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other #2	<input type="radio"/>	<input type="radio"/>				
Other #3	<input type="radio"/>	<input type="radio"/>				

If you have indicated 'Other' obstacles, please provide details:

Other #1

Implementation of the WFD

The implementation of Heavily Modified Water Bodies (HMWB) in some MS is not in line with the definitions of HMWB in the WFD (Article 4.3). A Good Ecological Potential (GEP) is not reached because the national / regional authority has either underestimated the significant adverse effect on specified use, or the benefits of possible mitigation measures to BQEs have been overestimated. Assessment has been made using only rough expert judgement.

Other #2

Other #3

9. What are the key challenges to water management in your country or region? Tick the most relevant challenges.

at most 5 choice(s)

- Chronic (or near chronic) water shortage
- Lack of prioritisation of water issues in the national political agenda
- Poor collaboration between key parties at national level
- Poor communication between Member States or with third countries
- Low public awareness of key water management aspects
- Insufficient consultation and involvement of the general public and relevant stakeholders
- Competing demands on water making it difficult to achieve good status of water, including water needs for growing population, agriculture, transport, energy production, etc.

- Insufficient monitoring of the impacts and pressures on water
- Insufficient integration with other water related sectors and conflicting planning policies
- Insufficient research and innovation related to water management
- Challenges posed by agricultural activities (e.g. nutrients, eutrophication, pesticides, abstractions, etc)
- Challenges posed by the consequences of climate change
- Difficulty in identifying emerging issues early enough (risk management)
- Inadequate powers for enforcement vis-à-vis users
- Difficult access to justice on water-related cases
- Lack of resources (e.g. staff, funds) to fully implement all the measures needed to achieve good water status
- Other

If other, please specify

Despite of unclear cause-effect chains, mitigation measures are prescribed, leading to poor ecological results and wasted money (inefficient implementation).

WFD timescales for achievement of 'good' were from the outset (2000) too ambitious (being 2015 to 2027) given the initial state of the waters, the response time to measures, the technical feasibility and cost and in some cases limitations of fundamental science linking 'problem' to 'cause' and then between 'effect' and 'measure'.

10. Water management includes planning, developing, and managing water resources, in terms of both water quantity and quality, across all water uses. How do you assess the overall water management in your country or region?

- Poor
- Moderate
- Very good
- I do not know

11. What actions do you think have had the most impact on improving water quality and efficiency of water use since the **Water Framework Directive** was transposed into national legislation in 2003? (Please give each issue a score between 5 and 1, where 5 =very significant improvement, 4 = major improvement, 3 = moderate improvement, 2 = slight improvement, 1 = no improvement. All issues should be scored if possible, but "Do not know/no opinion" may also be chosen).

	1 (No improvement)	2 (Slight improvement)	3 (Moderate improvement)	4 (Major improvement)	5 (Very significant improvement)	Don't Know / No opinion
Stricter regulation of environmental pollution	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Stricter regulation to minimise the use of hazardous chemicals in industry, etc.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
International co-operation to tackle pollution	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Changing approaches to the use of water for energy generation/conversion (e.g. hydropower, water cooling systems, etc.)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
More efficient waste water treatment technologies	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better technology in households/appliances to reduce water consumption (e.g. dual-flush toilets, shower-head flow controllers, eco-friendly washing machines)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Tariffs for water use (e.g. based on industrial, agricultural and domestic water metering)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
More publicly available information on water quality, water availability and water allocation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
More sustainable use of water in agriculture	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Changes in other agricultural practices that might affect water quality and its availability (e.g. reduced use of pesticides, organic farming, crop rotation, etc.)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Urban planning that "makes space for water"	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better integration of water protection and use of water for transport	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Academic research and research and innovation activities related to improving efficiency in water use and addressing possible sources of contamination	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other, please specify:

Reduction of pollution from industry

12. Do you consider that the way of conveying information on water management to the public has been sufficiently adapted to the demands of the digital era, both at national and/or EU level?

- Yes, for both EU and my country/region
- Yes, but only at EU level
- Yes, but only for my country/region
- No
- I do not know

13. Are you concerned about the potential effects of climate change on water quality and water availability?

- Yes, mainly about water quality
- Yes, mainly about water availability
- Yes, for both
- No
- I do not know

14. Do you consider that enough is being done to counteract the effects of climate change on water quality and availability?

- Yes, fully
- Yes, mainly about water quality
- Yes, mainly about water availability
- To some extent
- No
- I do not know

Flood management

15. Do you think that flood risk is a problem that needs to be tackled in your country or region?

- Yes
- No

16. Have you been directly or indirectly informed (e.g. via the authorities, your friends or colleagues, the media, the internet etc.) of potential flood risk in your area and/or on how to prepare to reduce your exposure to flooding?

- Yes
- No, and I do not know whether the area is at risk of flooding
- No, but I know whether the area is at risk of flooding or not

17. Do you think that the risk of flooding is higher in your area than it was a decade ago? [please note: higher risk means higher likelihood of and/or greater damage from, flooding, or both]

- Yes

- No
- I do not know

18. What are the key challenges to the effective management of floods in your area or in your country?
Tick the most relevant challenges.

at most 4 choice(s)

- Poor coordination between key parties responsible for flood risk management, leading to, e.g. disconnected planning
- Limited involvement of water-related sectors and the general public in flood-related planning
- Lack of information to fully develop Flood Risk Management Plans
- Inadequate flood risk management planning due to resource issues (human and/or financial)
- Competing demands for land: e.g. housing/economic activities versus "space for water"
- Lack of oversight over development in flood-risk areas (unregulated construction and/or inadequate infrastructure)
- Intensity and frequency of flood events aggravated by climate change
- Transboundary issues which can be difficult to coordinate or a lack of cooperation between neighbouring countries
- Lack of new EU- level initiatives to reduce flood risk, beyond flood-risk management plans
- Obtaining financing for flood management activities including for measures that mobilise nature's functions (for example natural water retention measures)
- Lack of recourse to a flood-damage compensation mechanism
- Land ownership issues (e.g. the high costs of relocating assets out of the flood plain)
- Other

If you indicated Other, please specify:

Lack of political will to make space for water.

19. Do you think the management of floods in your country has improved in the last decade?

- Yes
- Yes, to some extent
- No
- I do not know

20. How do you assess the overall management of flood risks in your country or region? [please note: even if the management of flood risk has not improved over the last 10 years, it may still be that flood risk is being well managed overall]

- Poor
- Moderate
- Good
- I do not know

21. Have you ever been called to participate, or proactively participated, in your area's flood risk management planning?

- Yes
- No

I do not know

Your awareness of EU water law

This final set of questions is intended to explore how aware you are of the EU water law, whether you have provided input to other consultation processes relevant to implementing it, and whether you feel the legislation has contributed to significant improvements in water quality status and management of water resources and flood prevention.

22. How familiar are you with the following pieces of EU law and the requirements they entail?

	Very familiar	Moderately familiar	Unaware
Water Framework Directive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Groundwater Directive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental Quality Standards Directive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Floods Directive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

23. Have the above pieces of EU law contributed to the rivers and lakes being less polluted and safer than they were a decade ago?

- Yes, to a large extent
- Yes, to some extent
- No
- I do not know

24. Have the above pieces of EU law contributed to the groundwater in your country being less polluted and safer than it was a decade ago?

- Yes, to a large extent
- Yes, to some extent
- No
- I do not know

25. How do you assess the overall contribution of the above pieces of EU law to better management of water resources, including water quantity and availability?

- High contribution
- Moderate contribution
- No contribution
- I do not know

26. How do you assess the overall contribution of the above pieces of EU law to the prevention of pollution of transitional and coastal waters (including fjords, estuaries, lagoons, deltas)?

- High contribution
- Moderate contribution

- No contribution
- Not applicable (land-locked countries)
- I do not know

27. Have you ever experienced a problem with water quality or quantity in your area?

- Yes
- No

If yes, please provide a short explanation of the problem:

2000 character(s) maximum

Extreme weather conditions are more and more common due to climate change. Droughts as well as floods reduce the generation from hydropower. Moreover, eutrophication of water systems has increased due to agriculture and silviculture.

28. Have you provided views/feedback on water quality/quantity issues?

- Yes, on water management issues generally
- Yes, on the draft River Basin Management Plans or draft Flood Risk Management Plans
- Yes, on the draft Flood Risk Management Plans
- I have not been aware of opportunities to provide my views
- I have not provided views despite being aware of opportunities

If yes, to whom have you provided them/it?

- To local or regional authorities
- To national water/environmental authorities
- To EU water/environmental authorities
- To NGOs
- Other

If other, please specify

Our members (national as well as regional electricity associations) have provided feedback on the national /regional levels too.

Thank you for spending time completing this questionnaire. Your answers are valuable in helping to understand people's views on this issue.

If you wish to expand on any of your answers or to add comments or information on other aspects relevant to water in Europe, please do so in the box below, or upload additional files.

For more specific input related to the implementation of the water legislation in your country or your sector, you are also welcome to respond to the stakeholders' consultation (Part II).

Additional comments:

2000 character(s) maximum

Please upload your file

Maximum of 3 pages / the maximum file size is 1 MB
Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

Part II – Expert stakeholder questionnaire

This part of the questionnaire is specifically designed for those with a higher level of technical knowledge of the four Directives mentioned in the introduction. The following list summarises the main features of the Directives.

The [Water Framework Directive \(WFD, 2000/60/EC\)](#) is the most comprehensive instrument of EU water policy. Its main objective is to protect and enhance freshwater resources with the aim of achieving good status of EU waters by 2015. The main tools to implement the Directive are the River Basin Management Plans (RBMP) and the Programmes of Measures which are drawn up in 6-year cycles. The Water Framework Directive requires Member States to, among other things:

- Characterise their river basin districts including the pressures they face from human activities
- Meet environmental objectives, i.e. no further deterioration of the status, and good chemical and ecological status for surface waters, good chemical and quantitative status for groundwaters.
- Establish registers of protected areas
- Implement monitoring programmes
- Develop and implement programmes of measures to meet the objectives
- Report their RBMPs to the European Commission following public consultation.

The [Groundwater Directive\(2006/118/EC\)](#) establishes groundwater quality standards for certain pollutants and outlines how Member States should set threshold values for other pollutants. The Groundwater Directive:

- Specifies how Member States should assess chemical status and identify pollutant trends
- Specifies what Member States should consider to prevent pollution and reverse upward trends.

The [Environmental Quality Standards Directive \(EQSD, 2008/105/EC\)](#) sets environmental quality standards for the priority substances specified in Annex X of the Water Framework Directive in surface waters. The Environmental Quality Standards Directive:

- Specifies how Member States may take account of "mixing zones" when assessing status in water bodies with point sources of pollution
- Requires Member States to establish inventories of emissions and actions foreseen and to report them in their RBMPs.

The [Floods Directive \(FD, 2007/60/EC\)](#) was the catalyst for introducing a risk management approach by Member States to significant floods across the EU. The ultimate tools to implement the Floods Directive are the Flood Risk Management Plans (FRMP) established in the Member States, which have to include the objectives and the measures necessary to meet them. The Floods Directive requires Member States to periodically:

- Carry out preliminary flood risk assessments
- Prepare flood hazard and flood risk maps
- Develop and adopt FRMPs following consultation of interested parties
- Report their assessments, maps and plans to the European Commission

Answering the questions that follow requires a working knowledge of the different Directives and bullet points listed above. Additionally, respondents should note that according to the [Commission's Better Regulation Guidelines](#), the regulatory fitness check procedure is designed to evaluate policy based on five criteria: effectiveness, efficiency, relevance, coherence, and EU added value. The questions are organised accordingly.

Effectiveness

This set of questions explores whether the **Water Framework Directive**, **Environmental Quality Standards Directive**, **Groundwater Directive** and **Floods Directive** have been effective in achieving their objectives.

1. To what extent has the implementation of the above Directives been effective in achieving the following objectives?

	Very effective	Moderately effective	Slightly effective	Ineffective	Counter-productive	I do not know
Prevention of deterioration of the status	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Protecting and enhancing aquatic ecosystems	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reducing chemical pollution of surface waters	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reducing nutrient pollution of surface waters	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reducing chemical pollution of groundwaters	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reducing nutrient pollution of groundwaters	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Protecting groundwater bodies from depletion	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting sustainable water use	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improving hydromorphological conditions of surface waters	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contributing to the protection of marine and coastal waters	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring sufficient investment in infrastructure and measures	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reducing the cost of drinking water production	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Mitigating effects of droughts	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Managing flood risk	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contributing to the provision of sufficient good quality water supplies	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other, please specify:

The Directives are moderately effective in increasing consideration for environmental aspects in planning and operation of water infrastructure. There is still a lack in consideration of climate change aspects as well as a missing coherence to the EU's climate and energy goals.

2. How far have the following factors contributed towards achieving the objectives of the Directives?

	Substantially	Moderately	Slightly	Not at all, or negatively	Do not know
The planning approach based on river basin districts	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The monitoring requirements	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The design and implementation of programmes of measures	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Harmonised parameters to define the ecological status (EC decision on intercalibration)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The setting of quality standards for pollutants at the EU level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Measures to tackle pollution caused by nutrient load and consequent eutrophication	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The requirement to set quality standards for other pollutants at national level	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The requirement to establish registers of protected areas	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Obligations regarding the recovery of the costs of water services	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The approach to assessing compliance	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The inherent flexibility of the Directives (e.g. extended deadlines, less stringent objectives)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The Common Implementation Strategy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Alignment with other legislation (in particular that under WFD Annex VI)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Coordination with the implementation of other legislation at EU or national level	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The duration of the planning cycles (also considering the cycles of other related legislation)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU support for implementing the Directives (e.g. coordination, knowledge sharing through the Common Implementation Strategy)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
EU support through funding (e.g. Regional funds, LIFE+, Framework Programmes for Research and Innovation, etc.)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enforcement actions at national and local level	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enforcement actions from EU level (infringement procedures)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The obligation for the River Basin Management Plans and Flood Risk Management Plans to undergo public consultation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Public awareness and public pressure	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other, please specify:

Stakeholder involvement is essential. Especially in the case of HMWB designation and classification, stakeholders might have the best knowledge of river hydromorphology, measures in place, possibilities to carry out additional measures as well as knowledge on studies already carried out on the ecology of waterbodies. This is also true for the economic effectiveness of mitigation measures.

Ad intercalibration: substantially different water bodies would require case-by-case assessment of ecological status based on a common methodology.

The WFD implementation could be improved making use of all the flexibilities allowing a good management of water. The guidance documents have in some cases reduced the possibilities instead of proposing adequate and adapted solutions.

There is insufficient policy coordination with climate change and energy policies.

3. To the best of your knowledge, are all the requirements of the Directives effectively implemented and enforced in your country?

Yes

- No
- I do not know

If no, please give examples of the most significant implementation gaps for the relevant Directives:

Water Framework Directive:

2000 character(s) maximum

To ensure policy integration, while Member States consider designating HMWB, they should take into account ambitions stemming from other EU legislation in order to reach EU energy & climate targets. To follow the logic of the designation, the resulting goal of “good ecological potential” must in turn avoid significant adverse effects on beneficial activities. Adverse effects include financial effects of the restrictions of operations (e.g. generation or flexibility losses) as well as the costs of mitigation or restoration measures. These significant effects have to be judged “case by case” and locally on a site/water body level, not on a macro-economic level. In order to be comprehensive, criteria should cover both quantitative and qualitative impacts.

Art. 4 WFD requires that measures to reach the goals of good ecological status or good ecological potential should be technically possible, economically reasonable and lead to a significant, measurable improvement. Only ecologically-effective as well as cost-effective measures should be implemented. Before implementation, the expected effect of measures on biological quality elements should be evaluated on scientific basis.

CBA of environmental measures which will cause losses of power generation or flexibility must include the long term value of the generation and/or flexibility lost as a cost of the measures. Fluctuating short and medium term power prices do not entirely depict such long term values of renewable power to society.

The objectives of the WFD are binding unless exemptions are applied (e.g. Article 4.7). Member States have different interpretations of these objectives, especially of the non-deterioration principle. ECJ-jurisdiction (Weser, ECJ Case C-461/13) has shown a restrictive interpretation leading to potential difficulties for the development of future economic activities for all stakeholders involved. This interpretation will lead to a more extensive need for exemption requests.

Groundwater Directive:

2000 character(s) maximum

Environmental Quality Standards Directive:

2000 character(s) maximum

Floods Directive:

2000 character(s) maximum

4. According to the **Water Framework Directive**, a water body is considered to be in good status only when all the relevant quality elements are in good status and the relevant quality standards for good status are met (the “one-out-all-out” principle). To which extent do you agree with the following statements:

	Agree to a large extent	Agree to some extent	I do not agree	I do not know
The one-out-all-out principle is applied consistently across all the Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
In your country, the one-out-all-out principle is applied in relation to the concentrations of the individual priority substances	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
In your country, the one-out-all-out principle is applied in relation to the concentrations of the individual river basin specific pollutants when assessing ecological status	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
In your country, the other physico-chemical elements, including temperature, pH and nutrient concentrations, are considered separately from the biological quality elements in the assessment of ecological status	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The one-out-all-out principle ensures that all relevant pressures are adequately covered in your country’s methods to assess ecological status	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The one-out-all-out approach results in a clear picture of where improvements are needed	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The consideration of assessment results according to the one-out-all-out principle allows for appropriate prioritisation of measures	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
It would be easier to explain to the public where progress has been made if the published official status did not have to be based on the one-out-all-out principle	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The one-out-all-out approach to classification encourages Member States to focus on improving water bodies that are close to good status rather than those in the worst condition	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
It would be worth looking at how to complement the one-out-all-out assessment with more detail on progress made on the ecological status	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Moving away from an assessment based on the one-out-all-out principle would risk losing sight of the outstanding issues	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

5. How do you rate the significance of the following obstacles to full implementation of the Directives?

	Very significant obstacle	Moderate obstacle	Not an obstacle	Do not know

Unrealistic expectations of the achievability of the environmental objectives in the time scales required by the Directives	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of governance structure to allow for an integrated approach to water management at national level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of political will to prioritise water issues at national level	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of appropriate revision of permitting systems	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Lack of funding to implement the measures required to meet the objectives of the Directives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Poor cross-sectoral coordination in implementing the Directives	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Poor enforcement of the Directives by the European Commission	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Lack of public information and consultation /opportunity to express views/access to justice	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Complexity of the implementation and reporting requirements	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Competition for the use of water (e.g. agriculture, domestic use, industry, recreation, navigation and energy), and conflict with flood protection, drought management, etc.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Differences in interpretation of key provisions between Member States	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Opposition from domestic users (the public)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Opposition from industrial/agricultural users	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of real-time data on the state of waters to facilitate identification of key sources/actors of pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Lack of sanctioning mechanism at national/local level to implement the polluter pays principle	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Other	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If other, please specify:

- Lack of knowledge on the effectiveness of measures being implemented (lack of knowledge on ecological causalities)
- The WFD is a framework that has to be integrated by MS into their legal and administrative structure. Concerning the point “Lack of appropriate revision of permitting systems”, we would like to point out that permitting schemes are historically grown and embedded into national law systems on property rights. Member states have and should have a free choice regarding the legislation of permits and authorisations.

6. Do you think that there are enough quantifiable indicators of when the objectives of the Directives have been achieved?

	Yes	Enough indicators, but not sufficiently quantifiable	No	I do not know
Water Framework Directive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Groundwater Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Environmental Quality Standards Directive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Floods Directive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

7. If you answered 'no' to the previous question or think that the indicators are not sufficiently quantifiable, please explain why.

Water Framework Directive

2000 character(s) maximum

Groundwater Directive

2000 character(s) maximum

Environmental Quality Standards Directive

2000 character(s) maximum

Floods Directive

2000 character(s) maximum

8. Have the Directives had unintended effects (positive or negative)? For each of the following effects, please indicate: 1) whether you consider it has happened; 2) and, if yes, whether you consider it to be a positive or negative consequence of the implementation of EU water law.

	Has happened (positive consequence)	Has happened (negative consequence)	Has not happened
More workers dealing with water management have environmental skills	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

There are fewer new houses and other buildings near rivers or the coast	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Member State authorities are more cautious about issuing emissions permits to new installations (e.g. integrated permits under the IED)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Authorisations and extensions of permits for hydropower plants now integrate the requirements introduced by the Water Framework Directive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Identification of contaminated groundwater has restricted land use in those areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Member States have focused on restoring water bodies that are closest to being in good status	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The legal obligations to comply with biota Environmental Quality Standards have complicated emissions permitting	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Insurance premium for assets mapped as being at risk of flooding has significantly increased	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The financial value of land in areas identified as being at risk of flooding has fallen	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Farmland has been converted to urban or industrial uses	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The area of productive farmland has decreased due to water management measures (e.g. buffer strips for rivers)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

If other, please specify:

Lack of data and use of rough expert judgement in classification have led to wrong class and wrong prioritization of measures taken to PoM.

The WFD has led to the loss of generation from renewable hydropower and therefore also to the decrease of valuable flexibility and hereby risk the achievement of European climate and energy targets.

9. The **Floods Directive** does not mention insurance, or more generally a risk transfer mechanism, as a means to compensated for the adverse consequences from flooding. In your opinion, would improved access to such a risk transfer mechanism, as part of a broad flood risk management strategy, be a useful measure?

- Yes
- No
- I do not know

Please elaborate on your reply:

2000 character(s) maximum

10. In your opinion, does the current reporting under the **Water Framework Directive** and the **Floods Directive** need to be revised, improved or simplified to allow for further reduction of administrative burden?

- Yes
- No
- I do not know

If yes, please give an explanation:

2000 character(s) maximum

Reporting requirements under the WFD should be reduced especially for BQEs (obligatory only for those with clear causalities).

11. The [Common Implementation Strategy](#) has supported the implementation of the Water Framework Directive and other related EU water policy. Has the Common Implementation Strategy addressed the right issues?

- Yes, fully
- Yes, to a large extent
- To some extent
- No
- I do not know

If no, or only to some extent, please give an explanation, and indicate which priority issues should be addressed via the Common Implementation Strategy:

2000 character(s) maximum

Policy coherence aiming at a better integration of water, climate and energy policies
Improved ways of sharing best practice examples and efficient flexibility mechanisms among MS and stakeholders

12. Do you consider the Common Implementation Strategy to be a sufficiently inclusive framework? Can relevant stakeholders participate and provide input as they deem appropriate?

- Yes, fully
- Yes, to a large extent
- To some extent
- No
- I do not know

If no, or only to some extent, please give an explanation:

Stakeholders from the relevant sectors can participate but their comments and contributions are not always taken into consideration.

13. Have the guidance documents produced under the Common Implementation Strategy proved helpful in the practical implementation of EU water policy?

- Yes, fully
- Yes, to a large extent
- To some extent
- No
- I do not know

If no, or only to some extent, please give an explanation:

2000 character(s) maximum

The CIS guidance documents are by far too scientific to provide ready-to-go answers (too long and complicated language – hard to communicate).

CIS documents should not be legally binding. It should be kept in mind that some proposals of the CIS documents could be contradictory to the mindset of the WFD. This would impede the practicable implementation of the MS.

14. Do you consider that the non-mandatory nature of these guidance documents affects their effectiveness and that they should be made legally binding through EU implementing acts?

- Yes
- No
- I do not know

15. Do you consider that research and innovation in support of water policy implementation is receiving a high enough priority?

- Yes
- No
- I do not know

Efficiency

This set of questions explores whether the **Water Framework Directive, Environmental Quality Standards Directive, Groundwater Directive** and **Floods Directive** have achieved their goals in an efficient and cost-effective manner.

16. Please indicate how you perceive the availability of information on the costs of measures and the benefits deriving from their implementation.

	High	Moderate	Low	None at all	I do not know
Availability and transparency of cost information on the implementation of the Directives	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Availability of information on possible funding and financing of measures (EU, national, regional level)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Comparability of the information on costs between (and within) Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Availability and transparency of benefits information	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

17. In your view, is the cost recovery principle (Article 9 of the Water Framework Directive) applied in your country?

- Yes, fully
- Yes, to a large extent
- To some extent
- No
- I do not know

18. Have the guidance documents produced under the Common Implementation Strategy proved helpful in the practical implementation of EU water policy?

- Yes, fully
- Yes, to a large extent
- To some extent
- No
- I do not know

If no, or only to some extent, please give an explanation:

2000 character(s) maximum

The CIS guidance documents are by far too scientific to provide ready-to-go answers (too long and complicated language – hard to communicate).

CIS documents should not be legally binding. It should be kept in mind that some proposals of the CIS documents could be contradictory to the mindset of the WFD. This would impede the practicable implementation of the MS.

19. Please rate the extent to which implementation of the Directives has resulted in the following benefits (please give each issue a score between 5 and 1, where 5 =very significant benefit, 4 = major benefit, 3 = moderate benefit, 2 = slight benefit, 1 = no benefit. All issues should be scored if possible, but "Do not know/no opinion" may also be chosen).

	1 (No benefit)	2 (Slight benefit)	3 (Moderate benefit)	4 (Major benefit)	5 (Very significant benefit)	Do not know / No opinion
Improved wellbeing such as avoided health effects	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Avoided or reduced emissions to the environment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Improved adaptation to climate change	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better coordination amongst different authorities in charge of water management issues	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better knowledge of water environments	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better integration of water with other or water-dependent sectors (e. g. nature, agriculture, transport, energy)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improved cooperation at national level	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improved cooperation at transboundary/transnational level	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improved water quantity	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improved chemical status of water	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improved ecological status of water	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improved biodiversity in surface waters	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improved knowledge and consequent remedial action	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improved public information	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased public involvement in integrated water management	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Reduced risk of flood damage to human health and the economy	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduced risk of flood damage to the environment and cultural heritage	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contribution to ecosystem services (e.g. provisioning of clean water, supporting nutrient cycles, recreational benefits)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improved availability and quality of treated water for water reuse purposes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improved economic growth and creation of jobs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

20. The costs of implementation may be linked to the achievement of the most significant benefits. To what extent do you agree with the following statements on the justification of costs and benefits of the (a) **Water Framework Directive**, the (b) **Environmental Quality Standards Directive** and the (c) **Groundwater Directive**?

20(a). To what extent do you agree with the following statements on the justification of costs and benefits of the Water Framework Directive?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don not know
The costs involved in relation to the Directive/s are justified given the benefits that have already been achieved in the short term	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The costs involved in relation to the Directive/s are justified given the benefits that have already been achieved in the longer term	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The costs involved in relation to the Directive/s are justified given the benefits that will be achieved in the short to medium term	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The costs involved in relation to the Directive/s are justified given the benefits that will be achieved in the long term	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
When considering the administrative costs linked to the implementation, the costs are justified compared to the benefits achieved	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further simplification of the law is possible (e.g. reducing monitoring and reporting requirements)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further optimisation of the law is possible (e.g. gaining additional benefits at similar cost, or the same benefits at lower cost)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further optimisation of the implementation of the Directive/s is possible (e.g. by instigating more sanctions in response to						

breaches of the Directives; by creating a cross-border network of authorities in charge of inspections and the instigation of sanctions)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Stronger links could be made with technical, research and innovation progress (e.g. by requiring environmental performance to reflect technological progress and advanced non-technological solutions)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The benefits from the Directive/s have increased over time	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

20(b). To what extent do you agree with the following statements on the justification of costs and benefits of the Environmental Quality Standards Directive?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don not know
The costs involved in relation to the Directive/s are justified given the benefits that have already been achieved in the short term	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The costs involved in relation to the Directive/s are justified given the benefits that have already been achieved in the longer term	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The costs involved in relation to the Directive/s are justified given the benefits that will be achieved in the short to medium term	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The costs involved in relation to the Directive/s are justified given the benefits that will be achieved in the long term	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
When considering the administrative costs linked to the implementation, the costs are justified compared to the benefits achieved	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Further simplification of the law is possible (e.g. reducing monitoring and reporting requirements)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further optimisation of the law is possible (e.g. gaining additional benefits at similar cost, or the same benefits at lower cost)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further optimisation of the implementation of the Directive/s is possible (e.g. by instigating more sanctions in response to breaches of the Directives; by creating a cross-border network of authorities in charge of inspections and the instigation of sanctions)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Stronger links could be made with technical, research and innovation progress (e.g. by requiring environmental performance to reflect technological progress and advanced non-technological solutions)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The benefits from the Directive/s have increased over time	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

20(c). To what extent do you agree with the following statements on the justification of costs and benefits of the Groundwater Directive?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Don not know
The costs involved in relation to the Directive/s are justified given the benefits that have already been achieved in the short term	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The costs involved in relation to the Directive/s are justified given the benefits that have already been achieved in the longer term	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

The costs involved in relation to the Directive/s are justified given the benefits that will be achieved in the short to medium term	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The costs involved in relation to the Directive/s are justified given the benefits that will be achieved in the long term	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
When considering the administrative costs linked to the implementation, the costs are justified compared to the benefits achieved	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further simplification of the law is possible (e.g. reducing monitoring and reporting requirements)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further optimisation of the law is possible (e.g. gaining additional benefits at similar cost, or the same benefits at lower cost)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further optimisation of the implementation of the Directive/s is possible (e.g. by instigating more sanctions in response to breaches of the Directives; by creating a cross-border network of authorities in charge of inspections and the instigation of sanctions)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Stronger links could be made with technical, research and innovation progress (e.g. by requiring environmental performance to reflect technological progress and advanced non-technological solutions)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The benefits from the Directive/s have increased over time	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please upload a document or provide below the link(s) to data on costs and/or information on cost-benefit analysis available in your country or region

The maximum file size is 1 MB

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

21. To your knowledge, does the cost-benefit ratio associated with implementing the **Water Framework Directive**, the **Environmental Quality Standards Directive** and the **Groundwater Directive** differ between Member States, or between different regions in our or other countries?

- Yes
- No
- I do not know

If yes, please give some geographical examples if possible and describe the reasons for the differences in the cost-benefit ratio (e.g. different monitoring costs).

2000 character(s) maximum

The density of population and pressures compared to area of waters differ significantly between MS. The whole RBMP process and reporting is the same. Monitoring on site very often includes basic research as well.

22. The costs of implementation may be linked to the achievement of the most significant benefits. To what extent do you agree with the following statements on the justification of costs and benefits of the **Floods Directive**?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	Do not know
The costs involved in relation to the Directive are justified given the benefits that have already been achieved	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The costs involved in relation to the Directive are justified given the benefits that will be achieved in the short to medium term	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The costs involved in relation to the Directive are justified given the benefits that will be achieved in the long term	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
When considering the administrative costs linked to the implementation, the costs are justified compared to the benefits achieved	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further simplification of the law is possible (e.g. reducing monitoring and reporting requirements)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Further optimisation of the law is possible (e.g. gaining additional benefits at similar cost, or the same benefits at lower cost)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further optimisation of the implementation of the Directive is possible (e.g. by instigating more sanctions in response to breaches of the Directive; by creating a cross-border network of authorities in charge of inspections and the instigation of sanctions)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Stronger links could be made with technical, research and innovation progress (e.g. by requiring environmental performance to reflect technological progress and advanced non-technological solutions)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The benefits from the Directive have increased over time	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please upload a document or provide below the link(s) to data on costs and/or information on cost-benefit analysis available for the **Floods Directive** in your country or region.

The maximum file size is 1 MB

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

23. To your knowledge, does the cost-benefit ratio associated with implementing the **Floods Directive**, differ between Member States, or between different regions in your or other countries?

- Yes
- No
- I do not know

24. Taking account of the objectives and benefits of the **Water Framework Directive**, is there evidence that the Directive has imposed a disproportionate administrative burden on authorities (national, regional or local), economic operators (e.g. industries, water companies), individual citizens or other parties?

- Yes
- No
- I do not know

If yes, please describe the administrative procedures which you deem to have been excessive or disproportionate, the estimated (additional) costs (burden) and who has been subject to them.

Description of administrative procedures

2000 character(s) maximum

Extensive reporting requirements

(Additional) costs (burden) associated with the administrative procedures

2000 character(s) maximum

Bearer(s) of the administrative burden

2000 character(s) maximum

Public authorities (MS+regions), industry
indirectly this has also implications on the monitoring of impacts and measures for individual users

25. Taking account of the objectives and benefits of the **Floods Directive** is there evidence that the Directive has imposed a disproportionate administrative burden on authorities (national, regional or local), economic operators (e.g. industries, water companies), individual citizens or other parties?

- Yes
 No
 I do not know

Description of administrative procedures

2000 character(s) maximum

(Additional) costs (burden) associated with the administrative procedures

Bearer(s) of the administrative burden

26. When you think of the Flood Risk Management Plans (FRMPs) as tools for allocating resources efficiently, how do you prioritise the following statements (3 being the highest priority, 2 medium priority and 1 – low priority)?

	1 (Low priority)	2 (Medium priority)	3 (Highest priority)	Do not know / No opinion
The FRMPs should contain quantifiable and time-bound objectives for flood-related action	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

The FRMPs should prioritise flood related actions based on well-defined and relevant criteria	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
The FRMPs should contain clearly identified sources of financing to cover flood related actions, and a timeline for implementing the actions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

27. EU water law is conceived in an integrated way: some of the requirements of the Water Framework Directive link closely with the requirements of other legislation (e.g. Urban Waste Water Treatment Directive, Bathing Water Directive, Drinking Water Directive, Nitrates Directive, Sewage Sludge Directive, etc.). To what proportion of the overall benefits stemming from EU water law have the Water Framework Directive and its daughter Directives (Groundwater and Environmental Quality Standards Directives) contributed?

- 75% - 100%
- 50% - 75%
- 25% - 50%
- 1 – 25%
- 0%
- I do not know

Please explain your response:

2000 character(s) maximum

28. For the following Directives do you consider the monitoring obligations to be targeted at the right issues?

	Yes	No	I do not know
Water Framework Directive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Groundwater Directive	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Environmental Quality Standards Directive	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Floods Directive	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

29. Do you consider the frequency specifications for monitoring sufficiently clear and appropriate in the Directives, including (where relevant) as regards to the monitoring of chemical pollutants in water, biota and sediment?

- Yes, it is clear and appropriate
- Yes, it is mostly clear and appropriate despite a few minor uncertainties
- No, it is neither clear nor appropriate and there are major uncertainties
- I do not know

If no, or only to mostly clear, please provide a brief explanation of why and for which Directive

2000 character(s) maximum

More use of modelling to justify reduction (or at least no further expansion) of monitoring. This could result in reduced cost of implementation.

30. Are the Directives clear enough about the spatial aspects of monitoring?

- Yes, it is clear and appropriate
- Yes, it is mostly clear and appropriate despite a few minor uncertainties
- No, it is neither clear nor appropriate and there are major uncertainties
- I do not know

If no, or only to mostly clear, please provide a brief explanation of why and for which Directive

2000 character(s) maximum

31. Are the Directives clear enough about when monitoring is not or no longer required, e.g. for which substances or in which circumstances, and are those exceptions appropriate?

- Yes, it is clear and appropriate
- Yes, it is mostly clear and appropriate despite a few minor uncertainties
- No, it is neither clear nor appropriate and there are major uncertainties
- I do not know

If no, or only to mostly clear, please provide a brief explanation of why and for which Directive

2000 character(s) maximum

32. Are the requirements for trend monitoring and assessment clear and appropriate in relation to the **Groundwater Directive** and **Environmental Quality Standards Directive**?

- Yes, in relation to both Directives
- Yes, in relation to the Groundwater Directive only
- Yes, in relation to the Environmental Quality Standards Directive only
- No, in neither
- I do not know

33. Are the surface water watch list monitoring requirements appropriate for the intended purpose?

- Yes
- No
- I do not know

Relevance

This set of questions explores whether the **Water Framework Directive, Environmental Quality Standards Directive, Groundwater Directive** and **Floods Directive** are still relevant to the original objectives. Have the scientific, natural or policy landscapes and solutions evolved in ways which make the legislation or parts of the legislation less (or more) relevant?

34. Do you think the implementation of the **Water Framework Directive, Environmental Quality Standards Directive, Groundwater Directive** and **Floods Directive** has improved people's appreciation of the importance of good water quality, for the sake of the environment and human health, and how it can be achieved?

- Yes, fully
- Yes, to a large extent
- To some extent
- No
- I do not know

If no, or only to some extent, please give an explanation:

2000 character(s) maximum

RBMPs and PoMs are too extensive and too complex for the general public to read, even though, some progress has been made in RBMP2 on how outputs were presented to the public. In addition, also broad discussions take place, such as education on water in schools

35. Do you consider the relevant sectoral stakeholders to be sufficiently involved in the implementation of the **Water Framework Directive** and **daughter Directives** in your river basin/country?

- Yes, to a large extent
- Yes, to some extent
- No
- I do not know

If no, or only to some extent, please give an explanation:

2000 character(s) maximum

Insufficient involvement of sectoral stakeholders with regard to their operator costs (short-term as well as long-term) to be included in the RBMP.

36. Do you consider the relevant sectoral stakeholders to be sufficiently involved in the implementation of the **Floods Directive** in your river basin/country?

- Yes, to a large extent
- Yes, to some extent
- No
- I do not know

If no, or only to some extent, please give an explanation:

2000 character(s) maximum

Insufficient involvement of sectoral stakeholders with regard to their operator costs (short-term as well as long-term) to be included in the RBMP.

37. Are any aspects of the **Water Framework Directive**, **Environmental Quality Standards Directive**, **Groundwater Directive** and **Floods Directive** now obsolete for achieving good status or flood risk reduction?

	Yes	No	I do not know
Water Framework Directive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Groundwater Directive	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Environmental Quality Standards Directive	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Floods Directive	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

38. Do the **Water Framework Directive's** provisions on assessing ecological status sufficiently allow for the effects of climate change to be distinguished from other effects?

- Yes, fully
- Yes, to a large extent
- To some extent
- No
- I do not know

39. How relevant are the priority substances listed in the **Environmental Quality Standards Directive** to the overall quality of surface waters in your country?

- Highly relevant
- Moderately relevant
- Slightly relevant
- Not relevant
- I do not know

Please explain your answer:

2000 character(s) maximum

The degree of relevance differs among European countries, however, due to the one-out all-out principle of the WFD, a failure of a priority substance will affect the overall quality status of the surface water.

40. How does the relevance of the priority substances (as components of overall chemical pollution) compare with the relevance of substances identified as river basin specific pollutants in your country?

- Much more relevant
- More relevant
- Equally relevant
- Less relevant
- Much less relevant
- I do not know

Please explain your answer:

2000 character(s) maximum

The chemical status of multiple water bodies is good. Some rivers have a sediment chemical quality problem (mercury, Hg)

41. Are the surface water watch list monitoring requirements appropriate for the intended purpose?

- Yes
- No
- I do not know

42. Are the provisions of the **Water Framework Directive** and the **Groundwater Directive** sufficient to protect groundwater bodies from technological developments such as fracking?

- Yes
- No
- I do not know

43. What are currently the most important water management needs for society? Please rate the following options (5 = highest, 1 = lowest)

	1 (lowest)	2	3	4	5 (highest)	Do not know /no opinion
Advances in wastewater treatment technologies	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improved data (including monitoring data) to facilitate the identification of problems	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
New technological and non-technological (organisational, business, management) solutions to address water scarcity due to demand, i.e. to achieve improved water efficiency / sustainable use	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
New technological and non-technological (organisational, business, management) solutions to address water scarcity issues due to climate change, i.e. to achieve mitigation and adaptation	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improved agricultural techniques and best practices to manage water use in agricultural activities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improved water distribution networks to manage leaks and water loss	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improved water use in consumer markets (e.g. eco-friendly washing machines)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Greater public awareness of the key issues in water management	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Greater regulatory support to allow for national and cross-border enforcement of measures to achieve the objectives set in the Directives	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
More efficient and sustainable use of water for energy production	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
More efficient use of energy by the water-related industries	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better methods to assess the risk of a significant flood in a given area	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Considerably increased flood risk prevention and/or protection for flood prone areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
More accurate and timely methods for flood forecasting	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

44. In your opinion which of the following aspects contribute the most to the sustainable use of water?
(Please rank 5 – highest, 1 - lowest)

	1	2	3	4	5	do not know / no opinion
Water quality standards linked to use (e.g. less stringent standards for treated waste water used for irrigation than for treated waste water supplied to households)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Well-maintained water distribution networks (i.e. inspection, analysis, risk assessment and replacement of leaky pipework)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
New technological solutions that use water efficiently (e.g. eco-friendly washing machines) and optimised water treatment and distribution systems	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Impact assessments of water abstraction schemes	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Research and innovation to develop approaches that reduce water use / remove the need to use water at all	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Using and/or disposing of fewer chemicals, aiming at zero emissions of pollutants into the water cycle	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Introducing separate sewer/wastewater systems in buildings	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

River Basin Management Plans that manage and optimise water allocation to different uses according to the available resources	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Adequate policies on water pricing and cost recovery and tariffs	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water accounts as part of the planning cycles	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

If other, please specify:

Water pricing is not a relevant tool for all water uses and technologies, e.g. hydropower, where price incentives do not work to change behaviour or have distortive effects.

More fundamental work on e-flows is needed so that the relationship between flow and biology is better understood. Currently, the definition of e-flows and their implementation may be excessively precautionary and limit opportunity for use (for example if the biology would tolerate a flow as a weekly average but instead this is applied as a daily average then there is a lost opportunity for use (unless there is storage).

45. To what extent do the Directives contribute to managing the challenges arising from climate change in the EU, and to addressing its consequences?

	To a large extent	To some extent	To no extent	Negative effect	I do not know
Water Framework Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Groundwater Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Environmental Quality Standards Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Floods Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please explain how the Directives have contributed or failed to contribute to managing the challenges and to addressing the consequences

A holistic approach of European environmental, energy and climate policies is necessary to balance ecological, human and economic aspects and promote a sustainable use of water. As the WFD was developed in the 1990s, it does not sufficiently cover the aspects of climate change. However, a stable regulatory and investment framework is needed to ensure sustainable, long-term investments beyond 2027.

WFD give MS tools to take in to account important industrial activities like hydropower generation. However, a lot of renewable hydropower generation, storage and flexibility have been lost in several MS. Moreover there is pressure for additional losses. It is essential to fully implement the flexibility mechanisms given in WFD to take into account hydropower generation, storage and flexibility. Considering hydropower's crucial role in the EU's energy system is especially pertinent, given hydropower's capability of acting as balancing power in order to integrate variable RES-production into the power system.

The existing CIS guidance (RB planning under climate change) seems to imply that there is no need to distinguish climate change from other influences in WFD since the climate change signal will not be

separable from other influence prior to 2027 (which might suggest the reference conditions do not drift with climate change). However, clearly climate change will produce increasing physical, chemical and biological change and there is evidence of community changes already. Investment in long-life infrastructure now needs to have confidence in its ability to operate beyond 2027 during which, under current interpretation, climate change might be eroding available windows of change and leading to deterioration. Some clearer and workable position on the operation of WFD and CC beyond 2027 needs to be set out.

Coherence

This set of questions explores whether the **Water Framework Directive, Environmental Quality Standards Directive, Groundwater Directive** and **Floods Directive** are coherent, internally, with each other, and with other legislation, including in other policy areas. We are interested in understanding whether the Directives are articulated appropriately with other EU policies and interventions and in particular in identifying synergies but also potential conflicts, inconsistencies and gaps.

46. In your opinion how coherent are the **Water Framework Directive, Environmental Quality Standards Directive, Groundwater Directive** and **Floods Directive** internally?

- Fully coherent internally
- Mostly coherent internally
- Not coherent internally
- I do not know

If you answered 'mostly or not coherent' to the previous question, please briefly summarise the incoherence(s):

Water Framework Directive

2000 character(s) maximum

Groundwater Directive

2000 character(s) maximum

Environmental Quality Standards Directive

2000 character(s) maximum

Floods Directive

2000 character(s) maximum

47. If you answered 'yes' to Q46, please indicate where the incoherence(s) between the different Directives exist:

	Water Framework Directive	Environmental Quality Standards Directive	Groundwater Directive	Floods Directive
Water Framework Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Groundwater Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental Quality Standards Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Floods Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

48. Please indicate where you consider the legal framework provided by the collective actions of the **Water Framework Directive**, **Environmental Quality Standards Directive**, **Groundwater Directive** and **Floods Directive** to be coherent with the following environmental /sectoral legislation?

	Water Framework Directive	Environmental Quality Standards Directive	Groundwater Directive	Floods Directive
Drinking Water Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Urban Waste Water Treatment Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Marine Strategy Framework Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Bathing Water Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Industrial Emissions Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Habitats Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Birds Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Renewable Energy Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Persistent Organic Pollutants (POPs) Regulation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sewage Sludge Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Nitrates Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
REACH	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Biocidal Products Regulation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Common Agricultural Policy Regulations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Air quality legislation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inland Navigation Regulation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fertilisers Regulation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sustainable Use of Pesticides Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental Liability Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental Impact Assessment Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strategic Environmental Assessment Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Communication on EU strategy for adaptation to climate change	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Mercury Regulation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Aarhus Convention – public information and participation and access to justice	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please provide further details of any key synergies/conflicts between legislation:

2000 character(s) maximum

Conflict: There is a strong incoherence between energy policy / climate targets and the WFD. The implementation of the WFD has already decreased renewable energy generation from hydropower and will continue to do so.

Synergy: Point source emission to air is controlled through IED and thermal plant controlled through BREF.

49. Do you consider the legal framework provided by the collective actions of the **Water Framework Directive, Environmental Quality Standards Directive, Groundwater Directive** and **Floods Directive** to be coherent with the following environmental /sectoral policy areas?

	Fully coherent	Partially coherent	Neither coherent nor incoherent	Incoherent	Do not know
EU Strategy on Green Infrastructure	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Biodiversity policy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Chemicals policy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Marine protection policy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Climate change adaptation and mitigation policy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Industrial emissions policy	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Air quality policies	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Waste policies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Resource efficiency	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental liability	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Environmental crime	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Transport policy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Health protection	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Agricultural policies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Research and innovation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Life+ Funding	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Regional policy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Civil protection policy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

If other, please specify:

EU climate-energy and environmental policies show a degree of conflict in incorporating at the same time implications for GHG emissions and consequences on ecosystems. Failure in finding an efficient trade-off may mean that the policy framework addresses the strict protection of the existing natural resources at the expense of climate change and extreme weather events, and vice versa. Conflicts between the low-carbon agenda and the environmental agenda (in particular the WFD) negatively impact on the sustainability of the development and operation of hydropower facilities. At the same time, at implementation level, strong differences among MSs undermine a common effective management of water resources.

A coherent policy goal should be to drive towards responsible water use with water use optimization not water use minimization. In some cases driving water use ever lower would have adverse consequences in other policy areas (eg in cooling systems would lead to reduced cooling efficiency with consequent reduced fuel and raw material efficiency per unit product and greater emissions to other media per unit product. It can also lead to the need to use alternative materials and or increase chemical usage with consequences for chemical emissions at point of use and chemical use supply chain. Awareness of these linkages could be strengthened in WFD and wider water policy and guidance etc.

Please provide any comments:

2000 character(s) maximum

50. Do you consider the monitoring and reporting under the **Water Framework Directive, Environmental Quality Standards Directive, Groundwater Directive** and **Floods Directive** to be sufficiently aligned with

other relevant environmental policies (marine, nitrates, nature, air, emissions, etc.)? You may provide some details on specific policies in the text box in the table).

	Yes fully	Yes, mostly aligned	Some alignment but some issues	Poor alignment	Do not know
Water Framework Directive	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Groundwater Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Environmental Quality Standards Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Floods Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

Please provide further comments:

2000 character(s) maximum

EU-Added Value

This set of questions explores the added value of having the **Water Framework Directive, Environmental Quality Standards Directive, Groundwater Directive** and **Floods Directive** within a wider EU policy landscape.

51. What is the additional value of adopting legislation at EU level compared with what could be achieved by legislation at national/regional level?

	High added value	Moderate added value	No added value	I do not know
Water Framework Directive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Groundwater Directive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Environmental Quality Standards Directive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Floods Directive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

52. Can the following issues be best addressed at EU or Member State (MS) level?

	Only feasible at EU level	Better suited at EU level	Suited at either EU or MS level	Joint action most suitable (both EU and MS)	MS level better suited	I do not know

Funding for the Programmes of Measures under the Water Framework Directive	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Risks from emerging pollutants (microplastics, pharmaceuticals, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pollutant emissions to air and water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water scarcity and drought issues	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water reuse – setting of standards and promotion of its use	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Climate change mitigation and adaptation	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Water pricing issues and cost recovery	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Development of approaches for managing groundwater issues	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Specification of ranges for physico-chemical quality elements contributing to the ecological status assessment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Development of environmental quality standards for river basin specific pollutants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Development of threshold values for groundwater pollutants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Development of standards covering the risks from mixtures of pollutants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Development of standardised approaches to monitoring	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Management of significant risks from flooding	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Funding for measures against significant flood risk	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Avoiding riverine litter, including plastics	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Development of research and innovation technological and non-technological solutions to address implementation challenges of the above listed Directives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

If other, please specify:

Water pricing is better suited at MS level due to historically grown permitting and authorization as well as taxation systems (very different ownership and management rights). Water pricing is likely to be strongly spatially and temporally varying and therefore specific setting of prices at MS level as well as permitting at installation level should remain at MS level.

Final questions

If you wish to expand on any of your answers or if you wish to add comments or information on anything else relevant to the Fitness Check, please do so in the box below.

4000 character(s) maximum

The Union of the Electricity Industry - Eurelectric is the sector association which represents the common interests of the electricity industry at pan-European level, plus its affiliates and associates on several other continents. We currently have over 34 full members, representing the electricity industry in 32 European countries. Eurelectric has dedicated working groups on the topics of environmental protection, hydropower as well as thermal & nuclear. Moreover, Eurelectric is actively involved in the CIS working groups, currently having representatives in the Strategic Coordination Group, WG Ecostat, WG Groundwater, WG Chemicals and WG Data Information and Sharing.

The Water Framework Directive (WFD) is a central piece of legislation for the electricity sector as it is the purpose of the WFD to strike a balance between environmental, climate and socio-economic goals. A holistic approach of European environmental, energy and climate policies is necessary to balance ecological, human and economic aspects and promote a sustainable use of water. The WFD impacts electricity generation sector as possible conflicts arise e.g. between conserving water courses and generating renewable electricity from hydropower and / or using water for cooling purposes of thermal and nuclear power plants.

Eurelectric recommends considering the following when evaluating the WFD and assessing its implementation:

- Involve all relevant stakeholders in the development of the WFD to ensure a fair sharing of responsibilities and costs when defining and implementing mitigation measures to reach the Directive's goals.
- Fully recognise the subsidiarity principle and allow Member States to take into account their specificities when implementing the WFD. Therefore, propose best practice procedures and targets rather than unspecific standard solutions especially within guidance documents like those of the Common Implementation Strategy.
- Improve the implementation and governance of the WFD by using existing tools in a pragmatic and integrated manner and by systematically assessing the impacts of the River Basin Management Plans (RBMP) and their measures on the existing and future, decarbonized power system
- Keep Heavily Modified Water Bodies (HMWB) designation as a key category for the integration of ecological, human and economic aspects. These aspects should be reflected from the very beginning in any kind of analysis and discussion.

- Keep hydromorphological quality elements as supporting criteria since they serve as points of reference for the classification of water bodies.
Hydromorphology should be understood as a balance between positive and negative impacts and not only as a pressure.
- Implement the “non-deterioration” principle in a practicable and integrated way when applying the WFD exemption for projects, systematically considering hydropower and thermal generation’s role in fulfilling EU’s priorities in terms of energy and climate objectives.
- Only implement ecologically-effective as well cost-effective measures to prevent ecologically unsatisfactory solutions and unnecessary costs.
- Weigh the costs and benefits of implementing measures to avoid disproportionate costs.
- The cost-recovery principle of Art 9 WFD - applying only to water services - should focus only on specific water users in order to be considered an effective and efficient element of the WFD.
- Close the knowledge gap by increasing integrated expertise on all scientific questions arising from the WFD, such as river ecology and mitigation measures.

If you consider there are materials / publications available online that should be considered further in relation to this evaluation exercise please feel free to describe them (title and author) in the box below and include any relevant links.

4000 character(s) maximum

Eurelectric – in cooperation with VGB PowerTech e.V. – also published the report “Water Framework Directive: Experiences & Recommendations from the Hydropower Sector”. This one is attached (uploaded file) and can also be downloaded here: https://cdn.eurelectric.org/media/3113/wfd_experiences__recommendations_report-2018-030-0285-01-e-h-EC6C0086.pdf

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Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic Development

- Growth, added-value, efficiency

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- Commitment, innovation, pro-activeness

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