Stockholms universitet

2019-03-12

General views from the Stockholm University Baltic Sea Center regarding the Water Framework Directive – input to the EU Commissions open consultation on water legislation

Recovery time long: in general the recovery time of water bodies are long. This means that it is more or impossible to judge whether or not the WFD has had sufficient effect.

Too short cycles; the present duration of cycle, 6 year, is too short for the actions to be fully implemented and any effects measured. It mostly creates administration.

No money coupled to the WFD: presently there is no money allocated directly to the implementation of the WFD. This is a great obstacle.

Harmonization of WFD monitoring targets and methods among the Baltic Sea countries would increase the scientific quality of the collected data, and also improve the ability to make a holistic assessment of the progress towards Good Ecological Status of the sea.

Presently too little monitoring is being done. The resources are scattered. This leaves us with incomplete series of data hindering evaluation and research and thereby increased future efficiency in management.

Improved data (including monitoring data) is needed not only to facilitate the identification of problems but also to judge if improvement occurs.

Rgd GES; the 6 years cycle to achieve GES doesn't reflect ecological reality. In other words, ecosystem response times are slow. A process that allows for interim/intermediate goals could be more effective. For example, why not first set timelines to reduce the pressure (e.g. nutrient loads) first, and then, with the help of models, set later milestone dates for when recovery or even improvement might be observable in the ecosystem. These timelines will inevitably be longer than six years.

Stockholms universitets Östersjöcentrum

Stockholms universitets
Östersjöcentrum
106 91 Stockholm

Besöksadress:
Svante Arrhenius väg 20 F
Frescati

Telefon: 08-16 37 18
E-post: ostersjocentrum@su.se
www.su.se/ostersjocentrum

Stockholms universitet

That said, there is a process where MS's can ask for exceptions (e.g. cases when GES won't be achieved), but it is not apparent which exceptions have been granted and for which water bodies.

Lastly, the goals - good ecological status - have often been interpreted to be the conditions that would exist without substantial human disturbance. In the case of the Baltic Sea, it is not known if this is even achievable given that 85 million people live in the catchment and other factors, like climate change. This situation begs the question of whether we are investing in the most cost-effective measures.

The “one-out-all-out-approach” doesn’t reflect the real situation regarding ecological status. On the contrary it gives unclear information and not sufficient reporting to the end user. There is also a problem with different methods of sampling.

Recommended literature: Please read the following scientific article for important views on the WFD. The consclusions are:

“Monitoring and assessment needs to better reflect improvement in ecological status

- Management actions must account for the effects of multiple stressors
- WFD management targets need to acknowledge long-term recovery timescales
- Water resource protection must be mainstreamed into other policy instruments
- WFD implementation must acknowledge management needs beyond 2027”

Protecting and restoring Europe's waters: An analysis of the future development needs of the Water Framework Directive;
Science of the Total Environment 658 (2019) 1228–1238; [1]

---

[1]Laurence Carvalho a,∗, Eleanor B. Mackay b, Ana Cristina Cardoso c, Annette Baattrup-Pedersen d, Sebastian Birk e, Kirsty L. Blackstockf, Gábor Borics g, Angel Borja h, Christian K. Feld e, Maria Teresa Ferreira i, Lidija Globevnik j, Bruna Grizzetti c, Sarah Hendry k, Daniel Heringe, Martyn Kelly l, Sindre Langaas m, Kristian Meissner n, Yiannis Panagopoulos o, Ellis Penning p, Josselin Rouillard

Stockholms universitet

Yours Sincerely

Baltic Sea Centre/ through Gun Rudquist

---

q, Sergi Sabater r, Ursula Schmedtje s, Bryan M. Spears a, Markus Venohr t, Wouter van de Bund c, Anne Lyche Solheimm

a NERC Centre for Ecology & Hydrology (CEH), Edinburgh, UK
b NERC Centre for Ecology & Hydrology (CEH), Lancaster, UK
c European Commission, Joint Research Centre (JRC), Ispra, Italy
d Department of Bioscience, Aarhus University, Denmark
e Centre for Water and Environmental Research and Faculty of Biology, University of Duisburg-Essen, Germany
f Social, Economic and Geographical Sciences, James Hutton Institute, Aberdeen, UK
g MTA Centre for Ecological Research, Hungary
h AZTI (Marine Research Division), Pasaia, Spain
i School of Agriculture, University of Lisbon, Portugal
j University of Ljubliana, Slovenia
k University of Dundee, Scotland, UK
l Bowburn Consultancy, UK
m Norwegian Institute for Water Research (NIVA), Oslo, Norway
n Finnish Environment Institute (SYKE), Jyväskylä, Finland
o National Technical University, Athens and Hellenic Centre for Marine Research, Anavyssos, Greece
p Deltares, Delft, the Netherlands
q Ecologic Institute, Berlin, Germany

EU Consultation on Fitness Check for Water Legislation

Views from the Stockholm University Baltic Sea Centre, March 12th 2019

Försättsblad

Consultation runs until 4 March

1. Background report from EEA: European waters - Assessment of status and pressures 2018
2. At the EU Water Conference in Vienna in October last year, the water legislation was discussed. Material from this conference can be found here: https://ec.europa.eu/info/events/eu-water-conference-2018_en
3. If you wish to view the open consultation online (including the general public one): https://ec.europa.eu/info/law/better-regulation/initiatives/ares-2017-5128184_en
4. EU level environmental NGOs (WWF, EEB, ERN, EAA och Wetlands int) have put together their suggested answers to the consultation already: www.livingrivers.eu/resources/answers

Topics to consider:

- Protection of marine and coastal waters
- Nutrient pollution – measures to tackle pollution caused by nutrient load and consequent eutrophication
- Contribution to ecosystem services (e.g. supporting nutrient cycles)
- Biodiversity in surface waters
- Link between ecological status and effects of climate change
- Standardised approaches to monitoring
- Chemical pollution
- Relevance of priority substances
- Surface water watch list
- Monitoring of chemical pollutants in water, biota and sediment
- Quality of treated water for water reuse purposes and advances in wastewater treatment technologies
- Microplastics and pharmaceuticals

If you find that the consultation is missing something important which should be put forward in the review of the directives in question. Then Do please add these comments here:

Name	Directive	Topic	Comment
Henrik Svedäng	European waters - Assessment of status and pressures 2018	Assessment of water quality, which relates to a number of	Monitoring of water quality should include all elements and the total organic content, not just nutrients.

		the topics mentioned	

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

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

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 qualitystandards 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		X		x		
Protecting and enhancing aquatic ecosystems		X		x		
Reducing chemical pollution of surface waters						x
Reducing nutrient pollution of surface waters		X				
Reducing chemical pollution of groundwaters						
Reducing nutrient pollution of groundwaters						
Protecting groundwater bodies from depletion						
Promoting sustainable water use		X				
Improving hydromorphological conditions of surface waters			X			
Contributing to the protection of marine and coastal waters		X			x	
Ensuring sufficient investment in infrastructure and measures			X			
Reducing the cost of drinking water production						
Mitigating effects of droughts						
Managing flood risk						

Contributing to the provision of sufficient good quality water supplies						
Other		X				

If other, please specify:

From a research perspective it is impossible to link environmental effects with the different directives, and other programmes such as the BSAP and CAP. Chemicals have been banned but via other directives. Also for chemicals it is unclear whether or not the directives in this consultation have contributed. At least one can say that the WFD has forced local decision makers to consider water status by e.g. develop water plans and prioritize water.

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	X				
The monitoring requirements		X			
The design and implementation of programmes of measures	X				
Harmonised parameters to define the ecological status (EC decision on intercalibration)		X			
The setting of quality standards for pollutants at the EU level				X	
Measures to tackle pollution caused by nutrient load and consequent eutrophication		X			
The requirement to set quality standards for other pollutants at national level					
The requirement to establish registers of protected areas					
Obligations regarding the recovery of the costs of water services		X			

The approach to assessing compliance					
The inherent flexibility of the Directives (e.g. extended deadlines, less stringent objectives)					
The Common Implementation Strategy					
Alignment with other legislation (in particular that under WFD Annex VI)					
Coordination with the implementation of other legislation at EU or national level					
The duration of the planning cycles (also considering the cycles of other related legislation)				X	
EU support for implementing the Directives (e.g. coordination, knowledge sharing through the Common Implementation Strategy)					
EU support through funding (e.g. Regional funds, LIFE+, Framework Programmes for Research and Innovation, etc.)		X			
Enforcement actions at national and local level			X		
Enforcement actions from EU level (infringement procedures)					
The obligation for the River Basin Management Plans and Flood Risk Management Plans to undergo public consultation					
Public awareness and public pressure			X		
Other					

If other, please specify:

2000 character(s) maximum

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

- Yes
- xN

o

- 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 Voluntary actions in RDP for the farmers

Poor guidance from the Water Authorities.

Lack of funds. Funding has mainly come from the RDP.

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				x
In your country, the one-out-all-out principle is applied in relation to the concentrations of the individual priority substances	X			
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	X			
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				
The one-out-all-out principle ensures that all relevant pressures are adequately covered in your country’s methods to assess ecological status		X		

The one-out-all-out approach results in a clear picture of where improvements are needed			X	
The consideration of assessment results according to the one- out-all-out principle allows for appropriate prioritisation of measures			X	
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	X			
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		X		
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	X			
Moving away from an assessment based on the one-out-all-out principle would risk losing sight of the outstanding issues			X	

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	I do not know
Unrealistic expectations of the achievability of the environmental objectives in the time scales required by the Directives	X			
Lack of governance structure to allow for an integrated approach to water management at national level			X	
Lack of political will to prioritise water issues at national level		X		
Lack of appropriate revision of permitting systems		X		
Lack of funding to implement the measures required to meet the objectives of the Directives	X			
Poor cross-sectoral coordination in implementing the Directives				
Poor enforcement of the Directives by the European Commission				

Lack of public information and consultation/opportunity to express views/access to justice			X	
Complexity of the implementation and reporting requirements		X		
Competition for the use of water (e.g. agriculture, domestic use, industry, recreation, navigation and energy), and conflict with flood protection, drought management, etc.			X	
Differences in interpretation of key provisions between Member States				
Opposition from domestic users (the public)		X		
Opposition from industrial/agricultural users		X		
Lack of real-time data on the state of waters to facilitate identification of key sources/actors of pollution		X		
Lack of sanctioning mechanism at national/local level to implement the polluter pays principle		X		
Other				

If other, please specify:

2000 character(s) maximum

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	X			
Groundwater Directive				
Environmental Quality Standards Directive				
Floods Directive				

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

7. 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	○	○	○
There are fewer new houses and other buildings near rivers or the coast	○	○	○
Member State authorities are more cautious about issuing emissions permits to new installations (e.g. integrated permits under the IED)	○	○	○
Authorisations and extensions of permits for hydropower plants now integrate the requirements introduced by the Water Framework Directive	○	○	○
Identification of contaminated groundwater has restricted land use in those areas	○	○	○
Member States have focused on restoring water bodies that are closest to being in good status	○	○	○
The legal obligations to comply with biota Environmental Quality Standards have complicated emissions permitting	○ X	○	○

Insurance premium for assets mapped as being at risk of flooding has significantly increased			
The financial value of land in areas identified as being at risk of flooding has fallen			
Farmland has been converted to urban or industrial uses			
The area of productive farmland has decreased due to water management measures (e.g. buffer strips for rivers)			
Other			

If other, please specify:

2000 character(s) maximum

8. 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

9. 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

10. 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

11. 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:

2000 character(s) maximum

12. 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

13. 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?

- Ye
- s
- No
- I do not know

If yes, please indicate which document(s) should be made mandatory and provide the reasons for your response:

2000 character(s) maximum

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

- Ye
- s
- XN
- o
- 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.

15. 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	○	○	○ X	○	○
Availability of information on possible funding and financing of measures (EU, national, regional level)	○	○ X	○	○	○
Comparability of the information on costs between (and within) Member States	○	○	○	○	○
Availability and transparency of benefits information	○	○	○	○	○

16. 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

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

2000 character(s) maximum

17. 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

18. 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						X
Avoided or reduced emissions to the environment			X			
Improved adaptation to climate change			X			
Better coordination amongst different authorities in charge of water management issues				X		
Better knowledge of water environments			X			
Better integration of water with other or water- dependent sectors (e.g. nature, agriculture, transport, energy)			X			
Improved cooperation at national level			X			
Improved cooperation at transboundary/transnational level		X				
Improved water quantity						X
Improved chemical status of water						X
Improved ecological status of water						X
Improved biodiversity in surface waters						
Improved knowledge and consequent remedial action			X			
Improved public information						
Increased public involvement in integrated water management						

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

If other, please specify:

2000 racter(s) maximum

The assessment by EEA indicated an increased percentage of waterbodies in not good chemical status between the first and second cycle. However, this was attributed to more waterbodies of previously unknown chemical status being assessed, and more priority substances measured. It is therefore difficult to state that there was a deterioration of the chemical status in Europe. At the same time, the use of a limited range of priority substances, out of which the majority are banned since beginning of 2000, does not say anything about the total chemical pressure and effect in the waterbodies. It is for the same reasons difficult to say anything about contribution to protection of marine and coastal waters. This is an issue commonly discussed, and the scientific community has suggested a range of improvements including e.g. effect based monitoring (but it is also important to acknowledge that effect monitoring does not easily enable design of appropriate measures, and that negative effects may be unpredictable or even non-toxic). More effort is needed to identify chemicals that will persist in the environment and develop early-warning systems for aquatic pollutants.

19 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?

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	I do 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						X
The costs involved in relation to the Directive/s are justified given the benefits that have already been achieved in the longer term						X
The costs involved in relation to the Directive/s are justified given the benefits that will be achieved in the short to medium term						
The costs involved in relation to the Directive/s are justified given the benefits that will be achieved in the long term		X				
When considering the administrative costs linked to the implementation, the costs are justified compared to the benefits achieved		X				
Further simplification of the law is possible (e.g. reducing monitoring and reporting requirements)						
Further optimisation of the law is possible (e.g. gaining additional benefits at similar cost, or the same benefits at lower cost)						
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)	X					
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)	X					

The benefits from the Directive/s have increased over time	○	○	○	○	○	○

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	Do 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	○	○	○	○	○	○
The costs involved in relation to the Directive/s are justified given the benefits that have already been achieved in the longer term	○	○	○	○	○	○
The costs involved in relation to the Directive/s are justified given the benefits that will be achieved in the short to medium term	○	○	○	○	○	○
The costs involved in relation to the Directive/s are justified given the benefits that will be achieved in the long term	○	○	○	○	○	○
When considering the administrative costs linked to the implementation, the costs are justified compared to the benefits achieved	○	○	○	○	○	○
Further simplification of the law is possible (e.g. reducing monitoring and reporting requirements)	○	○	○	○	○	○
Further optimisation of the law is possible (e.g. gaining additional benefits at similar cost, or the same benefits at lower cost)	○	○	○	○	○	○

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)	○	○	○	○	○	○
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)	○	○	○	○	○	○
The benefits from the Directive/s have increased over time	○	○	○	○	○	○

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	Do 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	○	○	○	○	○	○
The costs involved in relation to the Directive/s are justified given the benefits that have already been achieved in the longer term	○	○	○	○	○	○
The costs involved in relation to the Directive/s are justified given the benefits that will be achieved in the short to medium term	○	○	○	○	○	○
The costs involved in relation to the Directive/s are justified given the benefits that will be achieved in the long term	○	○	○	○	○	○

When considering the administrative costs linked to the implementation, the costs are justified compared to the benefits achieved						
Further simplification of the law is possible (e.g. reducing monitoring and reporting requirements)						
Further optimisation of the law is possible (e.g. gaining additional benefits at similar cost, or the same benefits at lower cost)						
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)						
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)						
The benefits from the Directive/s have increased over time						

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

20 To your knowledge, does the cost-benefit ration 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

21 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	○	○	○	○	○	○
The costs involved in relation to the Directive are justified given the benefits that will be achieved in the short to medium term	○	○	○	○	○	○
The costs involved in relation to the Directive are justified given the benefits that will be achieved in the long term	○	○	○	○	○	○
When considering the administrative costs linked to the implementation, the costs are justified compared to the benefits achieved	○	○	○	○	○	○
Further simplification of the law is possible (e.g. reducing monitoring and reporting requirements)	○	○	○	○	○	○
Further optimisation of the law is possible (e.g. gaining additional benefits at similar cost, or the same benefits at lower cost)	○	○	○	○	○	○
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)	○	○	○	○	○	○

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)						
The benefits from the Directive have increased over time						

If you have indicated "Strongly Agree" or "Agree" to the statements regarding further simplification or optimisation, please provide specific suggestions below:

2000 character(s) maximum

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

22 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

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

23 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

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

2000 character(s) maximum

Bearer(s) of the administrative burden

2000 character(s) maximum

24 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

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

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

2000 character(s) maximum

Bearer(s) of the administrative burden

2000 character(s) maximum

25 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				
The FRMPs should prioritise flood related actions based on well-defined and relevant criteria				
The FRMPs should contain clearly identified sources of financing to cover flood related actions, and a timeline for implementing the actions				

26 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 Great question would love to know the answer.

27 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		X	
Groundwater Directive			
Environmental Quality Standards Directive			
Floods Directive			

If no, please explain why not:

2000 character(s) maximum **Emma adds***.*

28 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

29 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

30 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

31 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

If no to any, please provide a brief explanation

2000 character(s) maximum

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

- Ye
- s
  No
- I do not know

If no, please provide a brief explanation

2000 character(s) maximum

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?

33 Do you think the implementation of the Water Framework Directive, Environ mental 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 Public awareness of water quality has increased but if it is thanks to WFD, it is impossible to know.

34 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. The farmers are often involved but other stakeholders are not included.

35 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

36 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	X		
Groundwater Directive			
Environmental Quality Standards Directive			
Floods Directive			

If you answered 'yes' to the previous question can you briefly summarise what these are:

Water Framework Directive

Some chemicals included in the priority list are seldom exceeding or found close to their EQS, and could likely be deselected or be subject to less frequent monitoring.

.

2000 character(s) maximum

Groundwater Directive

2000 character(s) maximum

Environmental Quality Standards Directive

2000 character(s) maximum

Floods Directive

2000 character(s) maximum

37 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
- X No
- I do not know

38 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
- XModerately relevant
- Slightly relevant
- Not relevant
- I do not know

Please explain your answer:

2000 character(s) maximum

Most priority substances are seldom measured in concentrations exceeding their EQSs. However, the concentrations of mercury and PBDEs are higher than the thresholds in all Swedish waterbodies. It is relevant to ensure that the priority chemicals are not emitted and that their levels are below their EQSs. It has, however, been shown that toxic effects are induced in a range of biotests when mixing a subset of the priority substances at their AA-EQS-concentrations, indicating that mixture effects are likely needed to be considered in determination of safe levels. However, the majority of the priority substances are well below their thresholds in Swedish surface water since they are since long banned and sometimes legacy pollutants. Basing activities in Programs of Measures will therefore not lead to constructive work to protect water resources from chemical pollution.

39 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
- X I do not know

Please explain your answer:

This is difficult to answer as the RBSP of Sweden have been measured in a very small fraction of all waterbodies. However, when measured these

substancesfrequently exceed thresholds, which is also why they are included as RBSP.

2000 character(s) maximum

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

- Yes
- No
- I do not know

If no, please give an explanation of why not:

2000 character(s) maximum

41 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

If no, please give an explanation of why not:

2000 character(s) maximum

42 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				X		
Improved data (including monitoring data) to facilitate the identification of problems				X		
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						X
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						X

Improved agricultural techniques and best practices to manage water use in agricultural activities					X	
Improved water distribution networks to manage leaks and water loss	X					
Improved water use in consumer markets (e.g. eco-friendly washing machines)		X				
Greater public awareness of the key issues in water management			X			
Greater regulatory support to allow for national and cross-border enforcement of measures to achieve the objectives set in the Directives	X					
More efficient and sustainable use of water for energy production						
More efficient use of energy by the water- related industries						
Better methods to assess the risk of a significant flood in a given area						
Considerably increased flood risk prevention and/or protection for flood prone areas						
More accurate and timely methods for flood forecasting						

43 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)						
Well-maintained water distribution networks (i.e. inspection, analysis, risk assessment and replacement of leaky pipework)						
New technological solutions that use water efficiently (e.g. eco-friendly washing machines) and optimised water treatment and distribution systems						
Impact assessments of water abstraction						

schemes						
Research and innovation to develop approaches that reduce water use / remove the need to use water at all						
Using and/or disposing of fewer chemicals, aiming at zero emissions of pollutants into the water cycle					X5	
Introducing separate sewer/wastewater systems in buildings					X5	
River Basin Management Plans that manage and optimise water allocation to different uses according to the available resources						
Adequate policies on water pricing and cost recovery and tariffs						
Water accounts as part of the planning cycles						
Other						

If other, please specify:

2000 character(s) maximum

44 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		X			
Groundwater Directive					
Environmental Quality Standards Directive					
Floods Directive					

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

2000 character(s) maximum

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.

45 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

46 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				
Groundwater Directive				
Environmental Quality Standards Directive				
Floods Directive				

47 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	○	○	○	○
Urban Waste Water Treatment Directive	○	○	○	○
Marine Strategy Framework Directive	○	○	○	○
Bathing Water Directive	○	○	○	○
Industrial Emissions Directive	○	○	○	○
Habitats Directive	○	○	○	○
Birds Directive	○	○	○	○
Renewable Energy Directive	○	○	○	○
Persistent Organic Pollutants (POPs) Regulation	○	○	○	○
Sewage Sludge Directive	○	○	○	○
Nitrates Directive	○	○	○	○
REACH	○	○	○	○
Biocidal Products Regulation	○	○	○	○
Common Agricultural Policy Regulations	○	○	○	○
Air quality legislation	○	○	○	○
Inland Navigation Regulation	○	○	○	○
Fertilisers Regulation				

	○	○	○	○
Sustainable Use of Pesticides Directive	○	○	○	○
Environmental Liability Directive	○	○	○	○
Environmental Impact Assessment Directive	○	○	○	○
Strategic Environmental Assessment Directive	○	○	○	○
Communication on EU strategy for adaptation to climate change	○	○	○	○
Mercury Regulation	○	○	○	○
Aarhus Convention – public information and participation and access to justice	○	○	○	○
Other	○	○	○	○

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

Regarding chemical pollutants, it is unclear if there are any mechanisms in the various directives and regulations that ensure that a substance identified in the WFD as a threat to chemical status is also recognised in “upstream” legislation, e.g. REACH or UWWTD, or evaluated for prioritization downstream (groundwater directive, MSFD). For example, the UWWTD does not restrict emissions of any synthetic organic chemicals. It has been recognized that the coherence between various legislations should be assessed and enhanced where relevant.

2000 character(s) maximum

If other, please specify:

2000 character(s) maximum

48 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					
Biodiversity policy					
Chemicals policy			x		
Marine protection policy		x			
Climate change adaptation and mitigation policy					
Industrial emissions policy			x		
Air quality policies			x		
Waste policies					
Resource efficiency					
Environmental liability					
Environmental crime					
Transport policy					
Health protection					
Agricultural policies		X			
Research and innovation					
Life+ Funding					
Regional policy					
Civil protection policy					
Other					

If other, please specify:

2000 character(s) maximum

Please provide any comments:

2000 character(s) maximum

49 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			X		
Groundwater Directive					
Environmental Quality Standards Directive					
Floods Directive					

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.

50 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	x			
Groundwater Directive				
Environmental Quality Standards Directive				
Floods Directive				

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

	Only feasible	Better suited at	Suited at either	Joint action	MS level better	I do not

	at EU level	EU level	EU or MS level	most suitable (both EU and MS)	suited	know
Funding for the Programmes of Measures under the Water Framework Directive				X		
Risks from emerging pollutants (microplastics, pharmaceuticals, etc.)				X		
Pollutant emissions to air and water				X		
Water scarcity and drought issues				X		
Water reuse – setting of standards and promotion of its use				X		
Climate change mitigation and adaptation				X		
Water pricing issues and cost recovery				X		
Development of approaches for managing groundwater issues						
Specification of ranges for physico-chemical quality elements contributing to the ecological status assessment					X	
Development of environmental quality standards for					X	

river basin specific pollutants						
Development of threshold values for groundwater pollutants						
Development of standards covering the risks from mixtures of pollutants					X	
Development of standardised approaches to monitoring		X				
Management of significant risks from flooding						
Funding for measures against significant flood risk				X		
Avoiding riverine litter, including plastics				x		
Development of research and innovation technological and non-technological solutions to address implementation challenges of the above listed Directives				x		
Other						

If other, please specify:

2000 character(s) maximum

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

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

Please upload your file

The maximum file size is 1 MB. Only files of the type pdf,txt,doc,docx,odt,rtf are allowed