



The Horizon 2020 research project ZeroPM - Zero Pollution of Persistent and Mobile substances is very thankful for the opportunity to comment on the call for evidence for the Water Resilience Strategy.

Addressing pollution is equally essential to achieving water resilience

First, we broadly support the Environment Committee's (ENVI) rapporteur's [draft report](#) on 29 January, that states 'addressing pollution is equally essential to achieving water resilience' as is water efficiency. We agree with the ENVI reports call for better implementation and enforcement of the current EU water policy framework, the calls on the Commission to 'establish comprehensive EU-wide quality standards for PFAS totals in groundwater and surface water', and the need to address pollution from pharmaceuticals and other emerging pollutants and to better monitor pesticide residues in water. We also support a dedicated fund for water resilience in the upcoming multi-annual financial framework and the call for a wider application of the cost recovery principle.

Secondly, in ZeroPM we see the issues of water resilience ultimately linked to a combination of threats from pollution, climate change, and degradation of ecosystems. Three specific objectives from the initiative we would like to comment on are:

- Restore and protect the broken water cycle;
- Ensure clean and affordable water and sanitation for all; and
- Promote a competitive EU water industry and a clean, water-wise and circular economy

Restore and protect the broken water cycle:

- ▼ The Strategy needs to strongly link water resilience with lowering emissions of water pollutants pollution, in particular persistent pollutants, to surface and groundwater. e.g. PFAS, metals from mining sites, pesticides) Actions on this front include but are not limited to adding more pollutants in the Industrial Emissions Portal Regulation (IEPR), facilitating the implementation of urban wastewater emission (covered by UWWTD), and monitoring/taking action on soil pollutants that leach to groundwater/surface water (e.g. PFAS, metals from mining sites, pesticides) e.g. by linking to the draft Soil Monitoring and Resilience Directive
- ▼ The Strategy needs to link water pollution as a dimension of climate change: droughts increase concentration, floods spread contamination/ resilience needs to address pollution and water quality issues.
- ▼ The Strategy needs to fully address transformation products and precursors to protect the water cycle. An example can be seen for many PFAS and other persistent, mobile and toxic and/or very persistent and very mobile substances
- ▼ It should be ensured that there is an alignment of legislative thresholds across water policy that take into consideration the latest scientific advances
- ▼ The strategy needs to prohibit the use of drinking water for specific applications when they are located in areas with water scarcity. It is unacceptable that on Greek islands, where there is a water shortage, the construction of private pools or hotel pools is allowed while the water comes from the public water supply network or local wells.





Ensure clean and affordable water and sanitation for all;

- ▼ The Strategy should aim that affordable water can be supported by the implementation of the extended producer responsibility
- ▼ The Strategy should specify that by focusing efforts on upstream preventative measures, the goal of clean and affordable water and sanitation for all can be supported
- ▼ The Strategy should promote the increase the use of nature-based solutions (e.g. for flood resilience/drought resilience coupled to pollution prevention, e.g. storm water retention ponds with sorbents/connected to treatment infrastructure) for water management. Examples could be increasing provision for the design and construction of wastewater treatment plants that apply nature-based solutions in small communities and that have mandatory wastewater reuse.
- ▼ The Strategy should recommend developing actions and support awareness campaigns aimed at informing farmers and consumers about the benefits (as well as the potential risks) of wastewater reuse in agriculture.

Promote a competitive EU water industry and a clean, water-wise and circular economy

- ▼ The Strategy should promote the addition of more water pollutants on the Industrial Emissions Portal Regulation (IEPR)
- ▼ The Strategy should address the need to establish a European legislation that sets rules for the safe use of reclaimed water in urban applications (irrigation of green spaces with restricted or unrestricted access, toilet flushing, etc.). Currently, there are only national legislations in some Mediterranean countries
- ▼ The Strategy should identify the areas where research and innovation should be focused will support a competitive EU water industry
- ▼ The Strategy should recognize that funding is needed for projects related to the storage and distribution of reclaimed water.
- ▼ The Strategy should recognize that funding is needed for upgrading wastewater treatment plants that have been operating for more than 25 years
- ▼ The Strategy should support actions to strengthen the transparency of environmental data and online public access to them. Many countries do not publish data on the quality of surface waters, drinking water, and treated wastewater discharged into the environment. Even when data is provided, there is a significant delay in their publication. This does not support transparency and acceptance among citizens, and also undermines the potential success of wastewater reuse actions.

This reply to the call for evidence in connection with the Water Resilience Strategy is sent on behalf of the ZeroPM research project. ZeroPM stands for zero pollution of persistent, mobile substances and is a H2020 research and innovation project funded by the European Commission. ZeroPM interlinks prevention, prioritization and removal strategies to protect the environment and human health from persistent and mobile substances.

The opinions expressed below are sent on behalf of the following ZeroPM consortium members:

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And is not reflective of the opinion of the whole project consortium, nor does it reflect the views of the organisations that the authors represent. The opinions expressed are solely those of the authors. Opinions that are not signed carry no weight.

