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Red for disagreement or lack of clarity

DISCUSSION PAPER

Proposed framework structure of the Directive establishing strategies to prevent and control pollution of groundwater (GWD)

0. OVERVIEW

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1. BACKGROUND

On 23 October 2000 the European Parliament and the Council adopted the Directive 2000/60/EC, hereafter referred to as the WFD, establishing a framework for Community action in the field of water policy. This Directive forms the basic legislation for the protection of the European aquatic environment.

The debates during the conciliation often showed an insufficient conceptual basis for the various problems of groundwater protection. Consequently, the WFD included a provision, in Article 17, stipulating that the European Parliament and the Council should adopt specific measures to prevent and control groundwater pollution. These measures should be designed to achieve the objective of good groundwater chemical status in accordance with Article 4(1)(b)

of the WFD, acting on the proposal (of a new Directive) presented by the Commission in accordance with the procedures laid down in the Treaty.

An issue paper was prepared on 6 November 2001 to stimulate a first orientation debate of the Water Directors on the future proposal of Groundwater Directive, hereafter referred to as GWD, according to Article 17 of the WFD. This paper has been largely built on the provisions set out in the WFD and the discussions during the conciliation process. The issue paper corresponded, therefore, to the starting point of an open discussion on different conceptual approaches based on a first analysis of groundwater pollution in Europe.

Built on this issue paper, results of expert drafting groups were integrated to prepare a synthesis paper describing different conceptual approaches based on the analysis of the different pollution problems occurring in European groundwater. This paper was finalised on 20 March 2002 and discussed at the second meeting of the Expert Advisory Forum (EAF) on Groundwater on 25-26 March 2002. The defined orientations enabled to propose first elements of a legislative Proposal for a Groundwater Directive at the third EAF Groundwater meeting on 25 June 2002, and the main draft outline of the GWD was presented at the fourth EAF Groundwater meeting on 8 October 2002.

The proposed GWD will complement the WFD, while integrating the requirements of Council Directive 80/68/EEC, in order to ensure continuity after its repeal (end of 2013), and ensure coherence with other relevant environmental legislation (e.g. the Landfill Directive, the Drinking Water Directive, the Nitrates Directive, etc.). It is a separate, independent piece of legislation, which is built on articles 4, 7, 11, 17 and related annexes of the WFD, whilst avoiding duplication.

NOTE: We fully support the integration of the requirements of the GWD. But this should take into account amendments concerning the list I and II substances as well as the necessity to provide for EU prevention measures for priority substances.

In other words, the GWD will not repeat groundwater features that are already covered by the WFD. In particular, derogation clauses (and preconditions) of Article 4 of WFD apply to surface water as well as to groundwater bodies; therefore, no elements of (further) derogation are foreseen.

NOTE This is an important statement. We must ensure that the DGWD does not provide new derogations, the relaxation of targets/timescales is adequately dealt with in the WFD.

All other provisions of the WFD regarding groundwater will fully apply to this directive, namely:

- Co-ordination of administrative arrangements within river basin districts (Article 3);
- Environmental objectives, in particular the no-deterioration clause (Article 4);
- Requirements for analysing the characteristics of the river basin district, review of the environmental impact of human activity and economic analysis of water use (Article 5);
- Establishment of a register of protected areas (Article 6);
- Identification of waters for the abstraction of drinking water and the establishment of safeguard zones for those bodies of water (Article 7);
- Monitoring requirements (Article 8);
- Principle of recovery of the costs of water services, including environmental and resource costs (Article 9);

- Establishment of a programme of measures (Article 11);
- Issues which can not be dealt with at Member State level (Article 12);
- Establishment of a river basin management plan for each river basin district (Article 13);
- Requirements for public information and consultation (Article 14);
- Reporting requirements (Articles 15 and 18);
- Technical adaptations following scientific and technical progress (Article 20);
- Plans for future Community measures to the Regulatory Committee (Article 21);
- Repealing clauses and transitional provisions (Article 22); and
- Provisions for penalties (Article 23).

The GWD will set out criteria for the assessment of the chemical status of groundwater, which shall be based on basic criteria defined in Annex V.2.3 of the WFD, and on the establishment of a core list of substances and parametric values set out at EU level to be used for the definition of groundwater chemical status. In addition, complementary parameters shall be identified by Member States, taking into account point and diffuse sources of pollution, groundwater use, and interactions of groundwater with surface water and terrestrial ecosystems. The assessment shall also consider natural background concentrations, either issued from modelling or measured.

This Directive makes operational measures to prevent and limit pollution, and prevent deterioration, of groundwater, by linking them to identified pressures and impacts from point and diffuse sources of pollution. In this view, a combined approach for the protection and control of pressures and impacts from point and diffuse sources will be set out in this Directive, integrating requirements of all relevant Community legislation.

Criteria for the identification of significant and sustained upward trends are specified in this Directive, on the basis of the initial characterisation of groundwater (assessment of *status quo*), a defined increase of substance concentrations and the establishment of a minimum period of time over which a trend should be demonstrated. In addition, starting points for trend reversal are defined on the basis of a given percentage attained in relation to selected standards.

2. SCOPE OF THE GWD

As explained in section 1 above, many of the issues relating to groundwater are already addressed in the WFD itself. The linkages between the Daughter Directive and the WFD will be explained in the whereas clauses of the groundwater proposal. In addition, we will need to indicate in the Articles of the Directive, what the scope of the GW Directive is namely, that it:

1. Reinforces the protection, enhancement and restoration measures with the aim of achieving good groundwater status by the end of 2015; article 17(1) WFD;
2. Sets up the criteria for assessing good groundwater chemical status; article 17(2)(a) WFD;
3. Sets up the criteria for the identification of significant and sustained upward trends and for the definition of starting points for trend reversals; article 17(2)(b) WFD;
4. Implements the measures necessary to prevent or limit the input of pollutants into groundwater and to prevent the deterioration of all bodies of groundwater, subject to the applications of the WFD concerning protected areas and abstraction of drinking water, and the derogation clauses specified in the same Directive; article 17(3) WFD;

NOTE We miss the clarification of what substances input to prevent and what to limit. Scope: Prevention should not only be limited to protected areas or drinking water abstraction, but must cover all groundwaters – pollution and protection zones are not supported.

5. Implements the measures necessary to identify and reverse any significant and sustained upward trend in the concentration of any pollutant resulting from the impact of human activity in order progressively to reduce pollution of groundwater; articles 17(4) and 17(5) WFD.

NOTE

SCOPE IS TOO LIMITED TO CARRY FORWARD AND IMPROVE 1980 GWD

3. DEFINITIONS

An essential element of the Directive will be the definition of key terms. The following is a non-exhaustive list with our initial for wording:

1. In the context of the definitions of **aquifer** and **body of groundwater** given in Articles 2(11) and 2(12) of the WFD, **‘significant flow’** means a flow of groundwater that, were it to be removed from an associated surface water body or a directly dependent terrestrial ecosystem, would result in a significant diminution in the ecological or chemical quality of that surface water body or significant damage to the directly dependent terrestrial ecosystems.

We support such definition of significant flow in the GWD

2. In the same context, **‘significant abstraction’** refers to groundwater bodies used, or intended to be used, for the abstraction of more than 10 m³ of drinking water a day as an average. By implication this volume is regarded as a significant quantity of groundwater. Geological strata capable, even locally, of permitting such levels of abstraction therefore qualify as aquifers.
3. **‘Unpolluted groundwater’** means groundwater in its natural state and/or largely unaffected by human activity.

Note: We support such definition, as it could form the basis of making the prevention of deterioration obligation effective to conserve our last “untouched” groundwater resources. But the following text does not make use of this definition.

4. **‘Point source of pollution’** refers to an identifiable and localised area, structure or facility, the discharges of which can cause pollution of groundwater.

Note: We are concerned that the term "discharge" implies authorised or planned release of pollutants and thus not cover accidental or operational losses. The EEB proposes " *an identifiable and localised area, structure or facility, which can cause pollution of groundwater by the discharge or release of pollutants*".

5. **‘Significant trend’** is related to the relative or absolute increase of concentration of a given substance in relation to the *status quo* (concentration measured at the time of the initial characterisation of the groundwater). The criteria will be detailed in a separate annex, with a cross-reference in the definition.

Note: We appreciate a strong definition of “significant trends”, but will be meaningless if applied as average over a groundwater body.

6. **‘Sustained trend’** is related to the increase rate of pollutant concentrations, which is demonstrated over a period of three years (half cycle of river basin management plan). The criteria will be detailed in a separate annex, with a cross-reference in the definition.
7. **‘Trend reversal’** is linked to the identification of significant and sustained upward trend of pollutant concentrations and is defined in relation to starting points. The criteria will be detailed in a separate annex, with a cross-reference in the definition.
8. **‘Starting points’** for trend reversal corresponds to a percentage of a defined standard for a given pollutant. The criteria will be detailed in a separate annex, with a cross-reference in the definition.

4.ASSESSMENT OF GROUNDWATER CHEMICAL STATUS

Specifications for the assessment of the chemical status of groundwater will be set out in an annex of the GWD, subject to the extension, application, and derogation clauses established in the WFD.

Note: The WFD does not provide derogations for the characterisation process. Derogations only exist for timescales of delivering water body status objectives, or for reducing the status to be achieved.

This assessment should be partly based on basic requirements and criteria defined in Annexes II.2.1 and V.2.3 of the WFD. They concern the initial characterisation of all groundwater bodies, the further characterisation of groundwater bodies identified as being at risk, and the basic criteria for the assessment of groundwater chemical status, without the need to include additional specifications above the WFD requirements. **Technical details are suitably covered by the horizontal guidance on water bodies and the IMPRESS guidance document (CIS Working Group 2.1).**

The initial characterisation should be completed by the end of 2004, which should roughly coincide to the adoption time of the GWD. This first characterisation phase should enable not only to identify groundwater bodies, or groups of bodies, being at risk but also to **establish their *status quo*** in order to enable trend studies to be carried out.

As stipulated in Annex II.2.2 of the WFD, further characterisation of groundwater bodies identified as being at risk shall include relevant information on the impact of human activity. This information shall take into account the list provided in the IMPRESS guidance document.

Natural background concentrations of groundwater bodies should be assessed (either by measurement or derived from modelling) and a conceptual understanding of each groundwater body should be established to determine the degree of interactions with surface,

transitional and coastal waters and terrestrial ecosystems. This understanding should be an integrated part of the further characterisation step, which implicitly classifies interacting groundwater bodies as being at risk. **These requirements are not explicitly specified in the WFD and should hence be covered by the GWD as additional requirements.**

5. QUALITY STANDARDS LINKED TO GROUNDWATER CHEMICAL STATUS

In addition to the basic criteria mentioned in section 4, the assessment of the groundwater chemical status is proposed to be based on the following criteria:

1. Establishment of a core list of substances and concentration values set at EU level to set up general boundaries between poor and good chemical status (used to define the groundwater chemical status).

Note: The EEB is not convinced that European standards effectively lead to a harmonised EU system. It potentially undermines existing protection standards if wrongly applied. For example a pesticides standard of 0.1 microgram/litre has been proposed as the boundary for good/poor status, However this standard was developed as zero proxy for drinking water and market authorisation tests rather than a level to which Europe's groundwaters can be legally polluted. Similarly The Nitrates Directive aims at ending eutrophication, an aim which will require much stricter standards than the proposed threshold of 50 mg Nitrates per litre, taken directly from the drinking water standards.

The selection of the substances linked to status definition should be based on (a) the requirement of general groundwater protection (precautionary principle), subject to derogation regarding naturally contaminated groundwater (b) groundwater use(s), and (c) interactions of groundwater with associated surface water and terrestrial ecosystems. This selection should hence rely on (1) existing EU legislation, (2) drinking water standards, (3) priority substances, and (4) MS regulations.

Note: We do not believe that we should speak of "naturally contaminated groundwater", since we should concentrate on anthropogenic pressures. The requirement of a new level of derogation is not welcome and conflicts with statements in the Background (Section 1) which states, "...no elements of (further) derogation are foreseen".

It is also difficult to see how pan-European standards can be set for pollutants with respect to their interaction with associated surface water and terrestrial ecosystems. Just how water quality impacts an ecosystem is entirely dependent on what the ecosystem is and to what degree it is dependent on groundwater flow.

For example if we were to merely take the receiving water body quality standards as a proxy for groundwater then many perfectly natural groundwater bodies may be condemned to poor status as their groundwater quality may naturally exceed surface water standards but make up only a small fraction of flow. If we were to take some blanket safety factor, say 10 times surface water standards; these would not protect surface water bodies with a high dependency on groundwater flow.

With respect to general groundwater protection, the list of EU-wide substances should be short and manageable and reflect the main types of pressures on groundwater bodies. It should be opened to periodic reviews.

For non-synthetic substances (e.g. metals), background levels should be assessed in order to take the natural variability into account. Derogation may be requested for groundwater containing naturally high levels of non-synthetic substances, which can be clearly differentiated from anthropogenic inputs. It would hence be for each of the river basin authorities to identify the background levels in groundwater.

2. Identification of complementary substances by the Member States, following a risk-based approach, considering point and diffuse sources of pollution. Identified substances shall be reported in each river basin management reporting cycle.

The establishment of values of the identified substances shall take into account their natural (derived) background concentrations, the identified risks of polluting substances, taking into account their persistence, toxicity and potential to accumulate in terrestrial ecosystem dependent on groundwater, the vulnerability of the groundwater body to the identified pollution, the use of groundwater (for abstraction as drinking water or other use) and the interactions of groundwater with surface water and terrestrial ecosystems.

3. On this basis, several levels should be considered when defining groundwater chemical status in relation to quality standards, namely: (1) general EU-wide standards applied to all groundwater as a matter of precautionary principle, subject to derogation regarding naturally contaminated groundwater

The setting of EU-wide standards does not equate to the precautionary principle for the reasons outlined above. The precautionary principle is best delivered by controlling the input of pollutants to groundwater through strong implementation of the prevent or limit requirements of the WFD.

(2) drinking water standards applied to groundwater abstracted, or intended to be used, for human consumption, (3) surface water standards and other relevant standards applied to groundwater in contact with surface water or terrestrial ecosystems,

Point 2) and 3) are already delivered by the WFD.

(4) standards set up by Member States on a case-by-case basis, e.g. for the purpose of prevention/control of point sources of pollution and protected areas. In all cases, groundwater bodies or restricted zones within groundwater bodies, should comply with the defined standards to be considered as good chemical status.

TABLE 2. EU-wide parameters	Parametric values setting the boundary between poor and good chemical status (general standards)
Aluminium	0.2 mg/l
Ammonium	0.5 mg/l
Cadmium	5 µg/l
Chloride	250 mg/l
Chromium	50 µg/l
Copper	2 µg/l
Lead	10 µg/l
Mercury	1 µg/l
Nickel	20 µg/l
Nitrates	50 mg/l
Phosphates ¹	50 µg/l
Pesticides ²	0.1 µg/l
Pesticides – Total ³	0.5 µg/l
Sulphate	250 mg/l
Total PAHs ⁴	0.2 µg/l
Tetrachloroethylene	10 µg/l
Trichloroethylene	10 µg/l
Conductivity	2500 µS cm ⁻¹ at 20°C

6. MONITORING SPECIFICATIONS FOR THE ASSESSMENT OF GROUNDWATER CHEMICAL STATUS

- Monitoring requirements of Article 8 of the WFD apply to the GWD. In addition to details given in the monitoring guidance document (CIS Working Group 2.7), additional specifications will be given in an annex of the GWD on the monitoring of risk zones (points sources of pollution) or protected areas (safeguard zones for drinking water abstraction and conservation areas) and their classification.

The concept of "risk zones" is new to us and it is unclear what they want to achieve.

¹ Sum of total organic and dissolved phosphorus (concentrations given as µg/l of P)

² Individual pesticides. Only those pesticides which are likely to be present in a given supply need to be monitored

³ Sum of all identified and quantified pesticides

⁴ Sum of concentrations of benzo(b)fluoranthene, benzo(k)fluoranthene, benzo(ghi)perylene and indeno(1,2,3cd)pyrene

2. Specifications would require the establishment of a monitoring grid (density of monitoring sites) that allows a proper risk assessment, including the monitoring of upper (recharge zone) and lower layers to identify groundwater bodies, or groups of bodies, being at risk;
3. For groundwater bodies, or group of bodies, determined as not being at risk, the maintenance of the surveillance monitoring grid should be ensured with a frequency adapted to local conditions and should be sufficient to enable Member States to be adequately confident that the bodies are at good status and that there no significant and sustained upward trends in the concentration of any pollutant;

Note: The use of the term "grid" implies a statistically robust spatial network of monitoring points. It is important to note that these would most likely have to be additional to boreholes established to monitor specific risk points (6.5 below) otherwise the results of averaging would become skewed.

4. For groundwater bodies, or restricted areas within groundwater bodies, responding to the criteria of Protected Areas as defined in Articles 6 and 7, and Annex IV of the WFD, the surveillance monitoring programme should be adapted to local conditions and should be designed to enable Member States to be adequately confident that no deterioration of the actual status of these bodies, or defined zones within these bodies (conservation areas or safeguard zones for drinking water abstraction), occurs and that there no significant and sustained upward trends in the concentration of any pollutant;
5. Specific monitoring requirements shall be established for risk zones (higher density and frequency) related to point sources of pollution, and assessment of their impact on existing or identified future receptors (such as drinking water supply, surface water or vulnerable terrestrial ecosystem); the contaminated plume should not extend beyond a limited area that should be defined and reported.

7. INTERPRETATION AND PRESENTATION OF GROUNDWATER STATUS

Following the specifications described in section 4, the assessment of the groundwater chemical status shall be set out as follows:

1. For those groundwater bodies, or groups of bodies, not being at risk, the results of individual monitoring points shall be aggregated and reported as arithmetic mean and confidence interval, which shall be used to demonstrate compliance with good groundwater chemical status;

Note: The EEB has strong reservations about the use of average groundwater concentrations to assess good chemical status as the only tool. The existing obligations under the WFD require additional consideration of interaction with surface waters and terrestrial ecosystems.

2. For those groundwater bodies, or groups of bodies, determined as being at risk, the results of individual monitoring points shall be reported as individual values, which shall be used to demonstrate compliance with good groundwater chemical status;

This statement is difficult to interpret. Just how will the individual values be used to demonstrate compliance? How many will be allowed to fail, or how many times over the monitoring period? Over what depth should the water be drawn?

3. For risk zones (point sources of pollution) and protected areas (safeguard zones for drinking water abstraction and conservation areas), the results of individual monitoring points shall be reported as individual values;

What does the reporting of individual values achieve? How will this be used to demonstrate compliance? Will all values have equal weighting?

4. In addition to the specifications given in Annex V.2.5 of the WFD with respect to groundwater chemical status, a distinction shall be made in the colour-coded map as indicated below:
 - Good chemical status: green
 - Protected areas within good chemical status bodies: green and light grey stripes
 - Risk zones within good chemical status bodies: green and red dots
 - Poor chemical status due to anthropogenic impact: red
 - Poor chemical status due to natural contamination: red and light grey stripes

8. **COMBINED APPROACH FOR THE PROTECTION AND CONTROL OF PRESSURES AND IMPACTS FROM POINT AND DIFFUSE SOURCES OF POLLUTION**

1. In making operational the measures to prevent or limit pollution and to prevent deterioration of groundwater, the entry of pollutants into groundwater shall be controlled on the basis of all identified pressures (using the IMPRESS guidance document as a checking list). These controls shall be periodically reviewed and, where necessary, updated.
2. Member States shall ensure that point and diffuse sources of pollution of groundwater are controlled according to the following combined approach:
 - (a) emission controls based on best available techniques, or
 - (b) in the case of diffuse impacts, controls including, as appropriate, best environmental practices

Note: We fully support the application of the combined approach

3. For the application of paragraph 2, Member States shall ensure the establishment and/or implementation of all relevant Community legislation, including the Directives referred to in Articles 10, 16 and Annex IX of the WFD, at the latest 12 years after its date of entry into force, unless otherwise specified in the legislation concerned.
4. Where a quality objective or quality standard, whether established pursuant to this Directive, in the Directives referred to in Articles 10, 16 and Annex IX of the WFD, or pursuant to any other Community legislation, requires stricter conditions than those which would result in the application of paragraphs 2 and 3, more stringent emission controls shall be set accordingly.

Note: There is nothing in this section that actually makes Article 4.b.i (*..prevent or limit the input of pollutants into groundwater..*) operational.

By only focussing on pollution pressures identified by initial characterisation these proposals cannot deliver the same level of protection as the existing 1980 GWD. This existing legislation recognises that some pollutants are undesirable (due to toxicity and persistence) in groundwater at any concentration and requires MS to prevent their input (List I substances). These controls are applied irrespective of any assessed risk as a truly precautionary approach to the protection of groundwater resources.

9. SPECIFIC MEASURES FOR POINT SOURCES OF POLLUTION AND PROTECTED AREAS

Note: The EEB is concerned about establishing a prevention scheme for point sources and protected areas while leaving diffuse pollution and non-protected areas with a limit scheme. This would effectively establish two level protection for groundwaters.

1. In addition to the measures identified in Article 11 of the WFD, specific measures to prevent or limit groundwater pollution from point sources shall be taken, in accordance with the following requirements:
 - Prevent at source, as far as technically and economically feasible, the degradation of groundwater;
 - Limit, as far as technically and economically feasible, the extension of the contaminated plume beyond the defined restricted risk zone;

Note: The Commission opens this paper with the statement that "*... derogation clauses (and preconditions) of Article 4 of WFD apply to surface water as well as to groundwater bodies; therefore, no elements of (further) derogation are foreseen.*"

The EEB is therefore extremely concerned about the wording of the first two bullet points above (9.1) which imply the new GWD will contain new derogation provisions. We believe that this would be undesirable and unnecessary as MS can apply technical and financial derogations to status objectives through the existing WFD.

The WFD does not allow derogations from the deterioration prevention obligation.

- Restrict the use of the site and of the groundwater to avoid the degradation of the water resources;
- Inform the potential users of the site of the potential risks of groundwater degradation.

Member States shall ensure the proper implementation of management plans of historical contaminated sites.

2. Similarly, in addition to measures specified in Article 11, and in accordance with Articles 6 and 7 of the WFD, specific measures to protect groundwater within protected areas (conservation areas or safeguard zones for drinking water abstraction) shall be considered, in accordance with the following requirements:

- Prevent entry of any pollutants in groundwater within defined conservation areas. The concentrations of synthetic substances in these zones should be close to zero;
- Prevent entry of any pollutants in groundwater within defined safeguard zones for drinking water abstraction. The concentrations of synthetic substances in these zones should comply with the requirements of the Directive 80/778/EEC as amended by Directive 98/83/EC;

Note: The EEB supports such strong protection for groundwater

- Control that interactions of groundwater in protected areas with associated surface bodies or directly dependent terrestrial ecosystems do not yield to adverse effects in any cases; concentrations of non-synthetic substances in groundwater of these areas should be within the natural range expected given the hydrogeological characteristics of the groundwater body;
- Restrict the use of the site and of the groundwater to avoid the degradation of the water resources;

Note: What does site mean? The WFD makes it clear that, subject to limited derogations, MS must not allow the deterioration of status of **any** water bodies, not just those that correspond with protected areas. The protection of groundwater resources is best served by clear implementation of the prevent or limit requirements of the WFD.

- Inform the potential users of the site of the potential risks of groundwater degradation.

10. IDENTIFICATION AND REVERSAL OF SIGNIFICANT AND SUSTAINED UPWARD TRENDS

The identification of significant and sustained upward trends and the definition of starting points for trend reversal shall be based on the following criteria:

1. Establishment of the *status quo* of groundwater at the initial characterisation stage as set out in Annex II.2.1 of the WFD.

This assessment should take into account the analysis of pressures and impacts, the delineation of groundwater bodies and the identification of restricted areas (protected areas and risk zones related to point sources of pollution). The establishment of the *status quo* should be based on an aggregation of data collected in the groundwater bodies, or group of bodies, and restricted areas within groundwater bodies. Arithmetic means and their confidence intervals should be reported for each of the following bodies, or areas:

- Groundwater bodies, or group of bodies, excluding data from protected areas and risk zones;
- Protected areas, separated into conservation areas and safeguard zones for drinking water abstraction;
- Risk zones related to point sources of pollution.

Note: It would appear that "at risk" water bodies will have concentrations reported on individual samples (7.2) yet *status quo* and trend analysis will be carried out on mean values. This could lead to individual concentrations rising inexorably in an individual borehole yet the overall average, and therefore trend, be reported as stable or negative when combined with other data.

2. Identification of significant and sustained upward trends based on a given increase of concentrations of pollutants (in absolute and relative terms) over a minimum of three consecutive years as set out below. The algorithm used should be based on the CIS Working Group 2.8 guidance document or equivalent.
3. Establishment of starting points for trend reversal based on a given percentage attained in relation to selected standards (both concerning the EU core list and parameters selected following a risk-based approach) as set out below:

The establishment of starting points for trend reversal shall be based on a given percentage attained in relation to selected standards (both concerning the EU core list and parameters selected following a risk-based approach). The following indicative targets shall apply to set up starting points for trend reversal:

- For pollutants issued from diffuse sources, value set at 50% of the standard;
- For pollutants issued from point sources, value set at 75% of the level of the EU-wide parameter or of the quality standards set out by Member States.