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3 August 2007

**To: EU Environment Ministers**  
**CC: Permanent Representations**

Dear Minister,

**Re: Water Scarcity and Drought discussion at the Informal Council of Environment Ministers**

In advance of your discussions at the Informal Council of Environment Ministers, which will take place in Lisbon from 31 August to 1 September 2007, we would like to share with you our views on the EU's strategy to address water scarcity and droughts as proposed by the European Commission on 18 July 2007.

**An integrated approach is needed to address the water scarcity and droughts challenge**

Water scarcity and droughts have a direct impact on citizens and economic sectors which use and depend on water but also threaten the sustainability of the natural resource base and resilience of vital freshwater ecosystems. Water scarcity and drought represent a major challenge, and climate change is expected to make matters worse. Tackling water scarcity and drought requires an integrated approach to managing water resources in order to maximise economic and social benefits without compromising freshwater ecosystems. This approach needs to take into account supply, use and demand for water, and to place the emphasis on people, their livelihoods and the ecosystems which sustain them. The demand side should be the top priority - producing more with less water in all sectors is essential to successful water scarcity alleviation. Protecting and restoring the ecosystems that naturally capture, filter, store and release water is also crucial to increasing the availability of good quality water. As Europe endures yet another summer where large areas have suffered either from extreme heat and water shortages or excessive rain and floods, this integrated approach must now be put into practice. The EU Water Framework Directive (WFD) provides the framework for such an approach and thus needs to be implemented and enforced, as a priority.

**The EU Water Framework Directive perfectly adequately addresses challenges of water scarcity and droughts and must be properly implemented and enforced**

The WFD introduced a shift in regulatory approach from multiple instruments with separate (but overlapping) objectives to one overarching instrument providing an integrated framework covering all water, all water uses, and all variables affecting the status of water bodies (both qualitative and quantitative). In our view, it is wrong and short-sighted to depart from such an integrated approach by introducing an additional legal instrument which singles out managing water at times of water scarcity and drought. The WFD sets the context for identifying ecological solutions for all freshwater ecosystem problems, including droughts, as a natural hazard, and water scarcity as a chronic water deficit resulting from human water demand and activities (annex 1 of this letter gives a detailed description of the opportunities the WFD offers to address water scarcity and drought situations in affected river basins).

We also think it is impossible currently to assess whether the WFD's River Basin Management Plans and the associated Programmes of Measures will adequately address quantitative issues since these plans are still in preparation and will only be adopted in 2009. All efforts should therefore be aimed at

maximising opportunities within the existing legal framework, and giving the highest priority to the ambitious implementation of the WFD, as well as rigorously integrating water concerns into relevant EU policies. The WFD will only be successful if other policies which have a major impact on freshwater ecosystems, like land-use planning and agriculture, all work towards the same objectives. The WFD requires authorities to collaborate with natural processes by, for example, restoring and conserving wetlands and floodplains. These are central to delivering ‘good water status’ and are instrumental in mitigating the effects of droughts and supplying clean and abundant water in resource-scarce situations.

**The European Commission’s proposed strategy is heading in the right direction but must be further strengthened**

Earlier this month, the European Commission presented its initial policy orientation for future action to address the challenges of the water scarcity and droughts. We support the integrated approach presented by the Commission’s promoting full implementation of the WFD, improved water savings and efficiency and adequate water pricing and cost recovery. We also support the suggested hierarchy of measures with water-saving measures at the top and creating new water supplies only as option of last resort. According to the Commission, the EU’s estimated water-saving potential is on average 20%, but increases to 45% of 2025 demand in Mediterranean countries, and exceeds 43% for agriculture and industry, and even 100% for electricity. It is only logical that this potential should be fully exploited before opting for capital and energy-intensive engineering solutions to increase water supply which, owing to their high environmental, energy and social costs, do not increase water security.

The policy orientation lacks specific measures to deal with the agricultural sector, which has been identified as one of the main water-users. Although the Commission’s analysis highlights the problem, it shies away on the issue of proposing substantive measures to allocate water and water-related funding more efficiently, and the only suggestion is a policy debate on further progress in sustainable agriculture. Continuous dialogue, no matter how useful, is not enough. There are several specific policy changes, some of which were suggested in the stakeholder consultation, which merit further consideration and are listed below (annex 2 to this letter provides more detailed comments on proposed strategy).

The EEB and WWF are asking you to consider the following elements in your joint response to the Commission’s proposed strategy:

- To strongly support the Commission’s overall approach of applying the ‘user pays’ principle, introducing a hierarchy of action where supply measures are the last option and focus possible further EU legislative action on water efficiency standards for buildings and products.
- To call for introducing full decoupling of production support for crops, addressing water quantity issues within the cross compliance mechanism, and ensuring that the environmental benefits provided by the set-aside system are maintained through an alternative system when the set-aside system is abolished
- To call for reinforcing rural development policy (CAP 2nd pillar) by a major transfer from direct payments (CAP 1st pillar) while at the same time putting rural development expenditure under a much stronger scrutiny in order to ensure Rural Development funding is spend on water saving programmes rather than on an increase in irrigated farm land.
- To ensure beneficiaries of CAP payments and other subsidies are authorised water-users (i.e. do not abstract water illegally)
- To ensure that “saved water” as a result of for example modernizing irrigation systems is allocated where it is most needed in the river basin (including to improve health and resilience of vital freshwater ecosystems)

Yours sincerely,

John Hontelez  
Secretary General, EEB

Tony Long  
Director, WWF EPO

**Extract from Water Framework Directive Common Implementation Strategy paper  
“Water Scarcity Management in the Context of WFD” (June 2006)**

Summary:

INTEGRATING SCARCITY & DROUGHT ISSUES IN THE IMPLEMENTATION OF WFD

“The recommendations described in this document must be clearly and explicitly linked to implementation of the WFD. Although the WFD is not directly designed to tackle quantitative issues, its purposes include contributing to the mitigation of drought effects (art. 1.e) and the promotion of sustainable water use (art 1.b) and its environmental objectives include ensuring a balance between abstraction and recharge of groundwater (art 4.1(b)(ii). Furthermore, water quantity can have a strong impact on water quality and therefore on good ecological and chemical status. In this respect, the Directive can be an instrument for addressing drought and water scarcity management.

River Basin Management Plans (RBMP) have to include a summary of the programmes of measures in order to achieve environmental objectives (art. 4) and may be supplemented by the production of more detailed programmes and management plans for issues dealing with particular aspects of water management. In this context, RBMPs could be used to describe and operationalise some of the measures proposed above. The following recommendations are made:

- Actions which will help to achieve WFD objectives through to managing water quantity (e.g. water scarcity) should be considered as “measures” (basic/supplementary) when developing WFD POM and associated RBMPs (art. 11, art. 13).
- When and where needed, a specific “drought management sub-plan” could be used to supplement the WFD RBMP (art. 13.5). Many EU countries already generate drought plans as part of their ‘security of supply’ procedures .
- Public participation, as required by WFD (art. 14), should also be organised around water scarcity management issues and should be coordinated with other initiatives taken to implement art. 14.
- When developing the WFD POM and associated RBMPs (art. 11 and 13), the interaction between quantitative and qualitative water management aspects should be considered through an integrated approach when developing plans and programmes in order to make coherency and create synergies where possible. The interaction between quantitative and qualitative water management aspects may lead to specific and supplementary constraints (technical and financial) for concerned countries. When setting the environmental objectives in the RBMPs, these additional constraints should be taken into account when justifying the potential exemptions.

Regarding exemptions, “prolonged droughts” are introduced in the Directive (Art, 4.6) as natural cause or force majeure events resulting in temporary deterioration in the status of water bodies. Therefore, in the context of the obligations of the WFD, clear definitions of what is understood by “prolonged droughts” will have to be established.”

## Extended extract

### **Environmental concerns (quantitative aspects in the WFD)**

The Water Framework Directive establishes that Member States, in implementing the programme of measures specified in the River Basin Management Plans (RBMP), shall protect, enhance and restore all surface water bodies and groundwater bodies with the aim of achieving good ecological status (good ecological potential for artificial and heavily modified water bodies) within 2015. Good status is defined, for surface water bodies, according to the ecological and chemical status, while, as regards groundwater, the good status refers to the quantitative and chemical status. So for surface waters, the Directive is more focused on quality aspects than on quantitative ones; nevertheless, quantitative aspects are addressed through an indirect approach.

Drought Management Plan at national level is linked to RBMP at river basin scale by the fact that there is a need of coherence between actions per basin. National strategy and instruments constitute the doctrine whereas measures are the actions at river basin level.

Moreover, RBMP must be linked to other land management plans (town-planning, public roads), especially soils management plans, in order to take into account the other management and planning instruments that can influence the quantitative management, notably in arid environments.

### ***Integration of qualitative and quantitative aspects***

Quantitative protection of water resources is closely linked to qualitative aspects. Reaching the objectives for good ecological status would be very difficult or nearly impossible without properly considering quantitative aspects. On one hand, quantitative actions are essential in order to guarantee ecosystems (typical habitats, dilution, prevention of extreme situations) and on the other hand, pollution diminishes available resources creating imbalances within the hydrological cycle and causing conditions of water stress. But in terms of compliance regimes, the good quantitative status only concerns groundwater bodies.

In this sense, an integrated protection of water resources is needed to achieve the good ecological status. This approach is fully taken up by the Directive which considers the key role of quantitative aspects in the recitals and especially in the following ones:

- RECITAL 19: *...control of quantity is an ancillary element in securing good water quality and therefore measures on quantity, serving the objectives of ensuring good quality, should also be established.*
- RECITAL 20 : *The quantitative status of a groundwater body may have an impact on the ecological quality of surface waters and terrestrial ecosystems associated to that groundwater body.*
- RECITAL 34 : *For the purposes of environmental protection, there is a need for a greater integration of qualitative and quantitative aspects of both surface waters and groundwaters, taking into account the natural flow conditions of water within the hydrological cycle.*
- RECITAL 41 : *For water quantity, overall principles should be laid down for control on abstraction and impoundment in order to ensure the environmental sustainability of the affected water systems.*

Even if the above-mentioned recitals clearly show the need for a greater integration of qualitative and quantitative aspects of both surface and groundwaters, the Directive doesn't talk about specific questions addressing quantitative aspects for surface networks.

The quantitative status of surface waters is considered in the WFD through the inclusion of the hydrological characteristics of water bodies in the provisions for the definition of ecological status (table 8).

Table 8 : Hydrological elements supporting biological composants

WATER BODY	HYDROMORPHOLOGICAL ELEMENTS SUPPORTING BIOLOGICAL COMPOSANTS
Rivers	Hydrological regime: - connexion to groundwater bodies - quantity and dynamics of water flow
Lakes	Hydrological regime: - quantity and dynamics of water flow - residence time - connexion to groundwater bodies

Regarding good status of inland water (rivers and lakes), the Directive says that “the hydrological regime must be consistent with the achievement of the values specified for the biological quality elements”.

As mentioned above, quantitative aspects are directly and fully considered in the assessment of groundwater status. A good status is achieved when the water level in the groundwater body is such that the available groundwater resource is not exceeded by the long-term annual average rate of abstraction. Accordingly, the level of groundwater is not sensible to anthropogenic alterations such as what would result from :

- failure to achieve the environmental objectives specified in Article 4 for associated surface waters
- any significant diminution of the status of such waters
- any significant damage to terrestrial ecosystems which directly depend on the groundwater body

Alterations of flow direction resulting from level changes may occur temporarily or continuously in a spatially-limited area, but such reversals do not cause saltwater or other intrusion and do not indicate a sustained and clearly identified anthropogenically-induced trend in flow direction likely to result in such intrusions.

**In conclusion, even if the WFD focuses on the qualitative aspects, it stresses that the quantitative aspects are essential for the achievement of good ecological status.**

### *Quality and quantity in RBMP*

The Directive provides some clear indications about the way to approach the need to integrate quantity/quality aspects. These indications are both included in RBMP and in the program of measures. As regards the RBMP, the Directive sets out that they consider the water bodies’ quantitative status in the river basin general characterisation and in the evaluation (table 9). Moreover, quantitative status considerations can play a role in other aspects covered by RBMP as the economic analysis or the applications of exemptions in Article 4.

Table 9 : River basin management plans

### **RIVER BASIN MANAGEMENT PLANS**

River basin management plans shall comprise the following elements:

- 1.1 A general description of the characteristics of the river basin district which includes an identification of reference conditions for the surface water body types.
2. A summary of significant pressures and impact of human activity on the status of surface water and groundwater, including an estimation of pressures on the quantitative status of water including abstractions.
- 4.2 A map presentation of the results of the monitoring programmes carried out under those provisions for the status of groundwater (chemical and quantitative).
5. A list of the environmental objectives established under article 4 for surface waters, groundwaters and protected areas, including identification instances where use has been made of Articles 4(4), (5), (6) and (7), and the associated information required under that Article.
6. A summary of the economic analysis of water use as required by Article 5 and Annex 3.
- 7.4 A summary of the programme or programmes of measures adopted under Article 11, including a summary of the controls on abstraction and impoundment of water, and reference to the registers and identifications of the cases where exemptions have been made under Article 11(3)(e).

#### ***Quality and quantity and reference conditions***

The definition of these elements, recognised by the Directive as essential for RBMP arrangements, implies the evaluation of water resource availability and the consideration of quantitative aspects in the definition of the reference conditions. For each surface water body type, the WFD requires that type-specific hydromorphological and physicochemical conditions shall be established representing the values of those elements for surface water bodies at high ecological status.

It is imperative to fully take into account quantitative aspects associated to the hydromorphological elements supporting the biological ones. In other words, in certain circumstances (e.g. arid climates, highly permeable soils, etc), quantitative aspects could play a crucial role in establishing the reference conditions and in achieving the environmental objectives.

#### ***Quality and quantity and river basin balance***

The integrated quali-quantitative approach is fully coherent with the logic of the hydrological balance and the protection of a flow consistent with the GES (Good Ecological Status). The definition of a balance, in fact, requires the assessment of inflow (natural flow and anthropic discharges) and of the outflow (for civil, agricultural, industrial uses, etc) : the difference between inflow and outflow must guarantee, on each homogenous stretch, a flow which protects the typical biocoenosis of the water body considered.

#### ***Quality and quantity in the programme of measures***

As regards the measures, the WFD defines a programme of measures which includes “basic measures” (minimum requirements to be complied with) and “supplementary measures” (designed and implemented in addition to the basic measures).

For both, measures of quantitative protection of the water bodies are introduced. In Article 11.3 (basic measures, table 10), controls are established over abstractions and impoundment, artificial recharge of water bodies and measures to ensure that the hydromorphological conditions of the water bodies are consistent with the achievement of the required ecological status.

The Directive defines a “non-exclusive list” of supplementary measures which aim to protect water quantity both on supply and demand side.

Table 10 : measures of quantitative protection of the water bodies in Article 11.3

### **Article 11.3**

Basic measures are the minimum requirement to comply with and shall consist of : (...)

(e) control over the abstraction of fresh surface water and groundwater, and impoundment of fresh surface water, including a register or registers of water abstractions and a requirement of prior authorisation for abstraction and impoundment. (...)

(f) controls, including a requirement for prior authorisation of artificial recharge or augmentation of groundwater bodies. The water used may be derived from any surface water or groundwater, provided that the use of the source does not compromise the achievement of the environmental objectives established for the source or the recharged or augmented body of groundwater. (...)

(i) for any other significant adverse impacts on the status of water identified under Article 5 and Annex II, in particular measures to ensure that the hydromorphological conditions of the bodies of water are consistent with the achievement of the required ecological status or good ecological potential for bodies of water designated as artificial or heavily modified. Controls for this purpose may take the form of a requirement for prior authorization or registration based on general binding rules (...)

#### **LIST OF MEASURES TO BE INCLUDED WITHIN THE PROGRAMMES OF MEASURES: PART B**

The following enumeration is a non-exclusive list of supplementary measures which Member States within each river basin district may adopt as part of the programme of measures required under Article 11(4): (...)

(viii) abstraction controls

(ix) demand management measures, *inter alia*, promotion of adapted agricultural production such as low water requiring crops in areas affected by drought

(x) efficiency and re-use measures, *inter alia*, promotion of water-efficient technologies in industry and water-saving irrigation techniques

(xi) construction projects

(xii) desalination plants

(xiii) rehabilitation projects

(xiv) artificial recharge of aquifers (...)

**Basic and supplementary measures must be selected with the aim to ensure a sustainable water balance and the minimum flow supporting the ecosystem**

## ANNEX 2

### **EEB/WWF detailed comments on the European Commission Communication “Addressing the challenges of water scarcity and droughts in the European Union” (COM (2007) 414)**

The EEB and WWF agree that water scarcity and droughts are issues of growing concerns. They have direct impact on citizens and economic sectors which use and depend on water but also threaten the sustainability of the natural resources base and resilience of vital freshwater ecosystems.

First of all, it is important to differentiate between droughts and water scarcity as they are caused by different factors and to successfully address them, different strategies need to be applied. Drought is a recurrent feature of climate, although often erroneously considered an unexpected and extraordinary event. The origin of every drought is a reduced precipitation over an extended period. Water scarcity is a permanent characteristic of chronic water deficit as a result of human water demand and activities. Drought is a natural hazard and as such cannot be fully controlled or prevented, water scarcity, on the other hand, can often be alleviated by changing water management practices and balancing water demand with water availability.

#### **What causes drought and water scarcity**

##### **Drought**

###### Natural causes

Since most inland water resources are sustained by precipitation, a temporal decrease in rainfall generally is the major initial cause of drought. Empirical studies in the last century have shown that a meteorological drought has never been the result of a single cause, but of many often synergetic causes. Factors that play a role in the development and characterization of drought besides precipitation for example are temperature and humidity, the evapotranspiration, wind velocity and pressure, geography of the region and vegetation. All of these factors determine the efficiency of precipitation and the severity of drought.

###### Man-made aggravations

Beyond the natural factors determining droughts, anthropogenic factors often set the pace and dimension of drought and severely aggravate its effects. Many of the causes are inter-related and are not easily distinguishable. The human variables in the phenomenon of droughts are the actions contributing to climate change, the current sector policies of water, agriculture, tourism and energy, the ways to secure the water supply and actual water consumption. Droughts may further develop cumulative effects from one year to the

##### **Water scarcity**

###### Man made causes

Anything that causes water shortages, contaminates freshwater supplies, damages the facilities that carry water to people can lead to water scarcity – imbalance between water supply and demand. Major factors include the heavy use of water for agriculture, industry, tourism; inadequate water pricing that encourages wasteful consumption, and the overuse of rivers, lakes, and aquifers. Most causes of water scarcity can be remedied or alleviated. Scarcity often has roots in water shortage, and it is in the arid and semi-arid regions affected by droughts and wide climate variability, combined with population growth and economic development, that the problems of water scarcity are most acute. Symptoms of water scarcity include severe environmental degradation, declining groundwater levels, and increasing problems of water allocation where some groups win at the expense of others

###### Global climate change

Climate change is expected to account for about 20% of the global increase in water scarcity (UN Water). Countries that already suffer from water shortages will be hit hardest. The impacts of a changing climate will affect not only bulk water

next, depending on the precipitation and also on water demand and consumption.

### Global climate change

The worldwide percentage of terrestrial area affected by serious drought more than doubled from the 1970s to the early 2000s according to an analysis by scientists at the National Center for Atmospheric Research in the US. Climate change has been singled out as the key factor. Climate change models project more frequent and intense summer droughts across many parts of Europe, particularly in the Southern part.

availability but also worsen the extremes of droughts. The water scarce situation may be further exacerbated because of an increasing demand for water as a result of elevated temperatures and decreased precipitation

The combination of development and climate change will increase the number of water stressed river basins in the EU from 19% today to 34-36% by the 2070s (European Commission)

### **What approaches are currently used to address water scarcity and drought**

Reactions to drought have typically been seasonal and reactive. When the water supply situation gets critical and drought impacts become obvious, emergency alleviating plans are launched and drought effects are attempted to be palliated by financial compensation. Ad-hoc policy and emergency “solutions” prevail over long-term strategic approaches.

During the past decade, widespread and severe droughts in Europe have resulted in an increased awareness of nations continuing vulnerability to this advancing natural hazard. This experience has resulted in initiatives by governments to improve the timeliness and effectiveness of response efforts. Particular emphasis has been placed so far on the improvement of forecasting instruments. In several countries drought plans have been developed but implementation is lacking because ultimately, each water-use sector insists on its share of water not being curtailed. In most countries, however, governments continue to deal with droughts in a reactive rather than proactive mode.

The traditional approaches to address water scarcity have focused on an increase in water supply rather than on a decrease in water demand in order to meet the current and future needs for water. Increased water supply is often meant to be secured via water transfers to provide dry regions with the vital resource, by intensified groundwater exploitation and construction of additional dams to achieve a higher storage capacity. As the environmental and social costs of this approach have become more apparent, it is more and more obvious that increasing water supply is not increasing water security.

Desalination is rapidly emerging as one of the major new supply-side options, raising significantly the overall energy intensity, potential climate impact and cost of supplying water. This dramatic up scaling of this option is occurring against a backdrop of unresolved questions on the potential environmental impacts of large scale processing of seawater habitat and the discharge of increasing volumes of concentrated brine wastes. As large desalination plants become “new dams”, attention is being diverted from less costly, less energy intensive and more environmentally benign alternatives such as water conservation, water use efficiency improvements and water recycling.

Supply-side measures based on hard engineering solutions should be the options of last resort when all possible demand measures have been exhausted, in particular situations and under particular conditions, and should be based on a strategic planning (including integrated approaches to managing supply and demand) and looking for the least impacting options.

## **How current EU policies and funding instruments address water scarcity and drought**

Failure to deal with rising water demand can be caused by a number of factors. These include inadequate pricing systems that neither recover the costs of providing users with water nor stimulate water savings, lack of compliance with water related legislation in force as well as lack of control by the authorities of the water and land use.

Some EU policies and related funding instruments contribute very partially and sometimes not at all to addressing water scarcity and droughts issues.

This becomes especially evident in the agricultural sector, one of the main water uses in EU27 and especially in Southern Europe where impacts of droughts and water scarcity are most acute. **EU Common Agricultural Policy (CAP)** subsidies have led to increased water consumption and provoked irrigation of traditionally rain fed crops or replacement of the rain-fed crops with irrigated cultivation of maize and sugar beet among others regardless of water availability. In Spain, olive production for instance has traditionally been a rain fed crop but is now the main water consumer in the Guadalquivir region in Andalucía.

This enhancing of irrigated agriculture furthermore stimulates the policy of water transfers and the construction of dams. One example of this is the planned Acheloos diversion in Greece to increase agricultural output in Thessaly including heavily subsidized cotton production (subsidies per kilogram of crop are currently close to world market price). On the other hand, EU Rural Development funds have been used to modernize the irrigation systems which has led to water savings. However this 'saved water' is often used to support further enlargements of irrigation areas or to cultivate more "thirsty" crops, which does not help to alleviate the impacts of water scarcity. It is therefore important that the budget of rural development is not only increased but that it is then also used to help use less water overall by investing in water saving technologies or is allocated where it is most needed in the river basin (including to improve health and resilience of vital freshwater ecosystems).

Although the CAP reforms in the last few years have introduced new approaches for EU agricultural funding (decoupling, cross compliance), in practice national implementations are weakening these changes. It is still to be seen how and to what effect the cross compliance regulation is implemented by the member states over the long run. Current compliance application in Spain or Italy for example is not impeding illegal water users from benefiting from CAP payments. Most importantly, water quantity issues are not part of the cross compliance system.

**The EU Regional policy** and associated funding mechanisms still continue subsidizing the construction of major dams and other infrastructures, although these degrade the status of water bodies and do not increase water security. Many actions to save water and manage water demand are potentially eligible for EU Structural or Cohesion Funds, however, to which extent the opportunities provided by these funding instruments will be utilized, remains to be seen.

**The EU Water Framework Directive** provides the general framework for water management in a way that all water uses (domestic, agricultural, industrial and ecological) and water availability are taken into account. It also allows member states flexibility to adapt their measures according to the problems faced whether it is shortage or excess of water. Overall, the WFD objectives of the "good ecological and chemical status" and "no deterioration in status" of the water bodies cannot be achieved if water quantity issues are not addressed. More specifically, the WFD advocates a number of tools that can be used to address both water scarcity and drought such as water pricing policies that provide incentives for the efficient water use, cost recovery principle including environmental costs, supplementary plans/long term strategies to address droughts, systematic control over water abstractions, choice of measures that ensures a sustainable water balance and the minimum ecological flow supporting the

ecosystems. Finally the WFD's objectives for water quality will have a direct impact on water availability as water sources which were previously too polluted to treat for drinking water purposes may become available.

Implementing these tools in the most effective way remains a serious challenge; member states still have a long way to go in making significant progress on the implementation.

### **Does the proposed EU strategy adequately address water scarcity and drought**

In July 2007 the European Commission presented the initial set of policy orientation for action to address the challenges of the water scarcity and droughts. EEB and WWF strongly support the integrated approach presented by the European Commission promoting full implementation of the WFD, focusing on water savings and efficiency and promoting adequate water pricing policies.

We also support the suggested hierarchy of measures with water saving measures at the top and new water supply infrastructures as an option of last resort. In the table below we comments more specifically on the various actions proposed.

<b>EC proposed action</b>	<b>EEB/WWF response</b>
1. Putting the right price tag on water	We fully support the Commission's proposal on water pricing and cost recovery. In addition, member states should revise/complete economic analysis of water uses carried out under the WFD (article 5) applying correct definition of water service and water use, integrating environmental and resource costs, and analysing the incentive dimension of water pricing, otherwise a functioning water pricing and cost recovery system cannot be established
2. Allocating water and water related funding more efficiently 2.1 <i>Improving land use planning</i> 2.2 <i>Financing water efficiency</i>	We welcome the suggested increased emphasis on sustainable agriculture. However, this needs to be supported by concrete measures, having another policy debate is not enough, for example <ul style="list-style-type: none"> <li>- introduce full decoupling of production support for crops, address water quantity issues within the cross compliance mechanism, and ensure that the environmental benefits provided by the set-aside system are maintained through an alternative system when the set-aside system is abolished.</li> <li>- reinforce rural development policy (CAP 2nd pillar) by a major transfer from direct payments (CAP 1st pillar) while at the same time putting rural development expenditure under a much stronger scrutiny in order to ensure rural development funding is spend on water saving programmes rather than an increase in irrigated farm land</li> <li>- ensure beneficiaries of CAP payments and other subsidies are authorised water-users (i.e. do not abstract water or use land illegally).</li> <li>- ensure that "saved water" as a result of for example modernizing irrigation systems is allocated where it is most needed in the river basin (including to sustain the over-stretched natural resource base) and is not automatically allocated to increase irrigated areas as is</li> </ul>

	<p>the case currently.</p> <ul style="list-style-type: none"> <li>- the impacts of support for biofuel needs to be closely monitored and the outcome of this monitoring should be used to regularly review EU and national biofuels support policies.</li> </ul>
3. Improving drought risk management	<p>Fully support. In addition, drought management plans produced outside the framework of the WFD, should be made WFD compatible.</p> <p>EU Solidarity Fund if extended to include drought should focus on immediate relief action and not fund long-term infrastructure. Also clear conditions and criteria will need to be set and implemented for accessing such funds in order to ensure that the expenditure will not thwart the meeting of overall policy objectives.</p>
4. Considering additional water supply infrastructures	Fully support. However, the mechanisms of ensuring that hierarchy of measures is respected will need to be developed
5. Fostering water efficient technologies and practices	Fully support
6. Fostering the emergence of a water saving culture in Europe	Fully support
7. Improve knowledge and data collection	Fully support
<i>Consider developing standards for water-using devices such as irrigation systems and other farm energy-using equipments</i>	Fully support
<i>Consider developing legislation to cover non-energy-using products including water-using devices (taps, shower heads, toilets).</i>	Fully support
<i>Include water efficiency criteria in performance standards for buildings when harmonising Life Cycle Assessments and Environmental Product Declarations.</i>	Fully support
<i>Consider developing a new directive similar to the Energy Performance of Building Directive for water performance of buildings. This could cover taps, showers and toilets, rainwater harvesting and reuse of "grey water".</i>	Fully support

For more information and questions contact:

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