

Feedback from:

Finnish Water Utilities Association (FIWA)

FIWA welcomes the revision of DWD. We want to raise the following points to guarantee that revised DWD will support the Finnish water utilities' objective to supply wholesome and clean drinking water.

Art. 2: The definition of large supplier should be amended as it includes rather small suppliers. The definition of vulnerable and marginalised groups leaves too much freedom for interpretation.

Art.5+Annex I: FIWA finds the update of parameters of Annex I necessary to reflect the recent scientific knowledge. We support the WHO recommendations as a sound basis for the parameters and their values. The parameters list should be clearly health based and there should be standard analytical methods available for the concentrations required for the parameters. The inclusion of non-health based parametric values cause unnecessary mistrust for the quality of drinking water. It is important to classify the parameters in Annex I into Microbiological parameters, Chemical parameters and Indicator parameters, similarly to the present DWD. We recommended to maintain the existing list of Indicator parameters with parametric values. The proposed Microbiological parameters Coliform bacteria, Heterotrophic plate count, Somatic coliphages and Turbidity should be categorised to Indicator parameters as their presence doesn't always indicate fecal contamination. Turbidity is a good parameter for operational control, with system dependent action limits. The proposed limit and monitoring frequencies for filtration are unnecessary strict for many cases.

Art. 7, Art. 8 and annex II: FIWA supports the introduction of risk-based

approach (RBA) to water safety. Systematic risk management in the entire water supply chain is an efficient tool to safeguard the quality of drinking water. Terminology and requirements should follow the standard terminology and methods of risk management. The resources used for systematic risk management safeguard the drinking water quality more efficiently than monitoring of tap water. Thus, the proposed monitoring frequencies are not in-line with the RBA and will lead to inefficient use of resources. The monitoring frequencies set in Annex II, Table 1 should be more clearly proportional to the volume of the distributed water. In Finland the average price for one customer is expected to raise minimum of 6,9 €/year due to the proposed monitoring frequencies. This price is more than tenfold the price of monitoring conducted under the current DWD. The proposed tasks, obligations and responsibilities of RBA between MS, water suppliers and property owners require clarification. The obligations for water suppliers should be set only in the areas relevant and possible for their responsibility. The supply risk assessment should be carried out by all suppliers, without distinction of size, by 6 years after the end-date for trans-position, and its review/update shall be carried out whenever necessary, not in set time intervals. We supports the link between DWD and WFD to guarantee high quality water sources for drinking water. The obligations in the DWD should be clarified to reflect the objectives of DWD and not the environmental objectives of WFD.

Art.10: FIWA regrets the deletion of art.10 of 98/83/EC Dir. The proposal is missing any requirements for the construction products in contact with drinking water in the water utility's system or for the chemicals used. Better regulation is needed for the materials in contact with drinking water via CPR and DWD.

Art.12: Directive should allow derogations also in the future. Not all non-compliances are a danger to human health.

Art.13: Access to drinking water supports the objectives of DWD, but the obligations of the points (a)-(c) are too detailed. Concrete acts should be left to be decided by MS.

Art.14 and Annex IV: We favour transparency and adequate information to water users. Water quality should be the focus of the relevant and in easily understandable information.

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