

## **Fitness Check on Freshwater Policy**

### *The Fitness Check of EU Freshwater Policy*

As part of its Smart Regulation policy, the European Commission announced in its **Work Programme for 2010** that, "to keep current regulation fit for purpose, the Commission will begin reviewing, from this year onwards, the entire body of legislation in selected policy fields through "**Fitness Checks**". The purpose is to identify excessive burdens, overlaps, gaps, inconsistencies and/or obsolete measures which may have appeared over time. To take this forward a Fitness Check on the protection of EU freshwater resources will be published in the first half of 2012. The Fitness Check will also be a building block of the **Blueprint to Safeguard Europe's Waters** to be published in November 2012. The Fitness Check will look, inter alia, at:

- any barriers (including in other policy areas) to meeting the already agreed objectives;
- issues related to implementation and measures that could improve the implementation of EU water policy;
- coherence of the legislation in place and whether there are any overlaps, inconsistencies and/or obsolete measures.

The scope of the Fitness Check includes 1) the **Water Framework Directive**, 2) the **Groundwater Directive**, 3) the **Directive on Environmental Quality Standards (EQS)**, 4) the **Urban Waste Water Directive**, 5) the **Nitrates Directive** and 6) the **Floods Directive**. It also examines quantitative and adaptive water management issues, for which there is currently no legislation at EU level (except for Floods), namely the **Communication on Water Scarcity and Drought** and the **Policy paper accompanying the White Paper on Adapting to Climate change On Water, Coasts and Marine Issues**.

More information on the Fitness Check of EU Freshwater Policy, including a scoping study undertaken to support the Fitness Check, can be found **here**.

### *This public consultation*

To support the European Commission in developing the Fitness Check of EU Freshwater Policy, it is necessary to obtain views and evidence on issues relevant to the Fitness Check from as wide a range of stakeholders as possible. This internet questionnaire provides an opportunity for everyone to comment on issues of relevance to the European Commission's Fitness Check of EU Freshwater Policy.

Please note that this public consultation focuses specifically on issues being addressed by the Fitness Check. Other issues of concern to stakeholders regarding EU freshwater policy will be addressed in the wider context of the Blueprint to Safeguard Europe's Waters. A separate public consultation will take place in 2012 to seek views and evidence to support the analysis and conclusions of the Blueprint.

The consultation is provided in English, French and German.

This consultation is open for 12 weeks.

### *The questionnaire*

The questionnaire follows the major themes of the Fitness Check: the relevance, coherence, efficiency and effectiveness of EU freshwater policy. Questions consider different aspects of these four themes for the policies included in the Fitness Check as well as interactions with other EU water law, other environmental policy and other EU policies.

The questionnaire begins with questions about you and your organisation. This is followed by 20 substantive questions on key issues of the Fitness Check. Each question includes both 'tick boxes' to respond to the question as well as the opportunity to elaborate on any or all of your responses.

If you have any additional comments or information that you think is relevant to the Fitness Check of EU Freshwater Policy, we invite you to upload them at the end of the questionnaire.

#### *How we will use the results*

The information that is provided through this public consultation will be fully taken into account by the European Commission in the production of the Fitness Check of EU Freshwater Policy to be published in the first half of 2012.

An analysis of the results of the public consultation will be undertaken after the conclusion of the consultation period and this will be made available on the Fitness Check website.

#### **Introductory questions**

**Your name (optional) (between 3 and 20 characters; count: 0)**

#### **Please select your country of residence**

\* (compulsory)

Austria	Italy	Sweden
Belgium	Latvia	Switzer
Bulgaria	Lithuania	Land
Cyprus	Luxembourg	United Kingdom
Czech Republic	Malta	Croatia Former
Denmark	Netherlands	Yogoslav
Estonia	Norway	Republic of Macedonia
Finland	Poland	Iceland
France	Portuga	Montenegro
Germany	IRomania	Turkey
Greece	Slovakia	Other non - EU country
Hungary	Slovenia	
Ireland	Spain	

**Please insert the name of the organisation you represent. If you are an individual, please indicate this.**

#### **What organisation do you represent?**

\* (compulsory) (between 1 and 30 characters; count: 0)

**Please choose from the following categories the most relevant to the organisation you represent.**

\* (compulsory)

- |  |                                   |                                    |
|--|-----------------------------------|------------------------------------|
| National Administrative Body                 | International Organisation        | Other                              |
| River Basin Authority or other water manager | NGO                               |                                    |
| Industry                                     | Academic member of general public | If other please specify (optional) |

**If your work or concerns are associated with a particular sector, please give the name of that sector [examples: agriculture, navigation, hydropower, energy, other].**

(optional) (between 2 and 100 characters; count: 0)

**If your work or concerns are associated with a particular river basin, please give the name of that river basin.**

(optional) (between 2 and 200 characters; count: 0)

### Relevance of EU freshwater policy

**1. Since the 1970s a range of EU Directives have been adopted to protect Europe's waters. Do you consider that this EU legislation has improved the quality of Europe's surface and ground waters?**

\* (compulsory)

- Yes
- No, it has not significantly improved the quality of waters
- No, most changes would have happened in any case
- I don't know

### *Addressing the challenges facing Europe's waters*

**2. There are many challenges facing Europe's waters and those that depend upon them. Do you consider that EU freshwater policy is adequate in its scope and detail to address the following issues (now and in the future)?**

	Yes	No	Partially	Do not know
Protection of ecosystems and biodiversity * (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Protection of human health * (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Pollution from industry* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Pollution from urban areas * (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Pollution from agriculture* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Over abstraction of water by agriculture* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Sustainable land use* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Hydromorphological changes of surface waters* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Reduction of flood risks* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Climate change* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Water scarcity and water availability * (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Droughts* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Water efficiency by users* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Leakage from water distribution systems* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Fostering innovative solutions to deal with water challenges* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Protection of river basins as a whole* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Please comment to explain any or all of your answers (please be clear which subjects you are commenting on) and make any recommendations you consider would improve the way EU water policy could address these issues.**

(optional) (maximum 2000 characters; count: 0)

**Type of instrument****3. Different types of policy instrument have been adopted to address different challenges of water management, including Directives with specific obligations, framework legislation, non-binding guidance, etc.**

Please rate on a scale of 1 to 5 how successful the following instruments addressed by the Fitness Check have been in addressing the challenges facing water management?

[1] is not successful at all and [5] is very successful.

	1	2	3	4	5
Water Framework Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Groundwater Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Directive on environmental quality standards in the field of water policy * (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Nitrates Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Urban Waste Water Treatment Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Floods Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Communication on Water Scarcity and Droughts* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
White paper on climate adaptation* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Please comment to explain any or all of your answers (please be clear which policies you are commenting on).**

(optional) (maximum 2000 characters; count: 0)

### Gaps in the policy framework

4. Even with the adoption of the Water Framework Directive and adoption of further legislation and policy over the last ten years you may consider that there are still gaps in the policy framework at EU level for freshwater or that new issues have emerged.

Do you consider that there are still gaps in the policy framework at EU level?

\* (compulsory)

Yes

No

Please comment to explain your answer and, if possible suggest how any gap should be addressed (e.g. by guidance, funding, binding legislation, etc.).

(optional) (maximum 2000 characters; count: 0)

### Climate adaptation

5. Adapting to future climate change is a major challenge to many policy areas, including water policy. The Commission has outlined its views in a White Paper on Adaptation and in the Communication on Water Scarcity and Droughts. Some EU water policy was developed at a time when climate adaptation thinking was not so advanced. Do you think that the requirements of the following Directives can accommodate climate adaptation needs?

	Yes	No	Partially	Do not know
Water Framework Directive* (compulsory)	<input type="checkbox"/>		<input type="checkbox"/>	<input type="checkbox"/>
Floods Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Nitrates Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Urban Waste Water Treatment Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please comment to explain any or all of your answers and, if possible, highlight any specific aspect of any Directive where you have concerns over its ability to accommodate climate adaptation needs.

(optional) (maximum 2000 characters; count: 0)

### ***Subsidiarity***

**6. EU water law sets out a wide range of obligations on Member States. However, it does not address every issue or prescribe every detail of water management. For instance the Water Framework Directive establishes policy objectives but leaves it to the Member States to identify the implementing measures. Is the current water policy framework correct in its balance between obligations set out at EU level and Member State action on other issues?**

\* (compulsory)

- To a larger extent Yes
- To a larger extent No
- Other
- Do not know

**If other, please explain (optional)**

(maximum 2000characters)



**Please comment to explain your answer and, if possible, indicate any specific issues which illustrate your views.**

(optional) (maximum 2000 characters; count: 0)

***Coherence of EU water law***

**7. Ideally, the different EU Directives should be consistent with each other with regard to objectives, timetables, implementation procedures, methodological standards, etc. For the Directives of the Fitness Check (Water Framework Directive, Nitrates Directive, Urban Waste Water Treatment Directive, Groundwater Directive, Floods Directive and the Directive on environmental quality standards in the field of water policy) do you consider that there are inconsistencies between them that have practical consequences for implementation?**

\* (compulsory)

- Significant inconsistencies
- Limited inconsistencies
- No inconsistencies with practical relevance

**Where you consider there to be inconsistencies between any EU water Directives please explain.**

(optional) (maximum 2000 characters; count: 0)

***Coherence with other EU water law and policy***

**8. The Fitness Check addresses a range of EU water legislation and policy. However, some water protection measures are not included, yet there are a number of potential interactions between these Directives and those included in the Fitness Check. Do you consider that the Directives and policies included in the Fitness Check are consistent and coherent with the following other EU water protection Directives?**

	Yes	No	Partially	Do not know
Bathing Water Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Drinking Water Directive * (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Marine Strategy Framework Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Please explain any or all of your answers (please be clear which Directives you are commenting on).**

(optional) (maximum 2000 characters; count: 0)

***Coherence with other EU environmental law and policy***

**9. Implementation of EU water policy contributes to the achievement of other EU environmental policy objectives (e.g. biodiversity protection). Implementation of EU water law may also be assisted by implementation of other environmental policies (e.g. on industrial emissions, environmental liability, etc). However, it is also possible that the objectives, obligations or procedures may not be coherent between EU water policy and other EU environmental policy. Do you consider that the following EU environmental policy areas are coherent with EU water policy?**

	Yes	No	Could contribute more	Do not know
Environmental impact assessment policy (EIA and SEA Directives) * (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Biodiversity policy (Birds and Habitats Directive and EU Biodiversity Strategy)* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Pesticides Framework Directive * (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Detergents Regulations* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Climate change mitigation policies* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Air protection policy* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Chemicals policy* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Pharmaceutical policy* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Industrial pollution control policy (IPPC/IED)* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Waste policy* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Resource efficiency policy* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Policy on public participation and access to information* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Environmental liability* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Environmental crime* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
LIFE+ funding* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Please explain any or all of your answers (please be clear which policies you are commenting on) and feel free to comment on any further area of EU environmental policy not included in the above list. Please also comment on how better integration of EU water policy with other environmental policies could be achieved.**

(optional) (maximum 4000 characters; count: 0)

**Coherence with other EU law and policy**

**10. The implementation of EU policies other than those concerned directly with the environment and can contribute to delivering the objectives or EU water policy or can threaten those objectives. Do you consider that there is coherence between EU water policy and the following other areas of EU policy?**

	Yes	No	Partially	Do not know
Agriculture policy (CAP)* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Regional policy (Structural and Cohesion Funds)* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Energy policy (Renewable Energies, TEN-E etc)* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Transport policy* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Industry/enterprise policy* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Development policy* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Health protection policy* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Research and innovation policy* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Please explain any or all of your answers (please be clear to which policy area you are referring to) and feel free to comment on any further area of EU policy not included in the above list. Please also comment on how better integration of EU water policy with sectoral policies could be achieved.**

(optional) (maximum 4000 characters; count: 0)

**Efficiency and effectiveness**

**Common Implementation Strategy**

**11. The Common Implementation Strategy (CIS) has supported the implementation of the Water Framework Directive and other EU water policy. It has worked through expert and working groups, inter alia, to develop guidance to support many different aspects of practical implementation of EU water policy in the Member States. Do you consider that:**

**The CIS process has addressed the right issues?**

\* (compulsory)

YES NO PARTIALLY DO NOT KNOW

**The guidance produced has proved helpful in practical implementation of EU water policy?**

\* (compulsory)

YES NO PARTIALLY DO NOT KNOW

**The CIS working methods have been well structured?**

\* (compulsory)

YES NO PARTIALLY DO NOT KNOW

**Please explain any or all of your answers (please be clear to which issue you are referring to) and feel free to comment on any changes to the CIS process that could make it more relevant or efficient.**

(optional) (maximum 4000 characters; count: 0)

#### **Administrative co-ordination**

**12.The Water Framework Directive encourages integrated management of river basins including administrative co-ordination as a necessary condition to achieve water management objectives. Do you consider that there is effective co-ordination of administration for the achievement of water management objectives in the following cases in your experience?**

**Between national public authorities within a Member State (e.g. between national Ministries)**

\* (compulsory)

YES IMPROVEMENT NEEDED

**Between the river basin authorities and other regional public authorities**

\* (compulsory)

YES IMPROVEMENT NEEDED

**Public authorities within a river basin in a Member State**

\* (compulsory)

YES IMPROVEMENT NEEDED

**Between national and river basin authorities**

\* (compulsory)

YES IMPROVEMENT NEEDED

**Among river basin authorities in a river basin across national frontiers**

\* (compulsory)

YES IMPROVEMENT NEEDED

**Between water management authorities and other public authorities for environmental protection**

\* (compulsory)

YES IMPROVEMENT NEEDED

**Between water management authorities and other public authorities for spatial planning**

\* (compulsory)

YES IMPROVEMENT NEEDED

**Between water management authorities and Stakeholders**

\* (compulsory)

YES IMPROVEMENT NEEDED

**Please explain any or all of your answers (please be clear which subjects you are commenting on).**

\* (compulsory) (maximum 2000 characters; count: 0)

### ***Planning***

**13. Directives contain obligations for Member States to develop and implement plans to deliver the implementation of practical measures. For the following Directives do you consider the planning obligations to be clear and achievable?**

	Yes	No	Partially	Do not know
Water Framework Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Nitrates Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Urban Waste Water Treatment Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Floods Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Please comment to explain any or all of your answers and make any recommendations you consider would improve the planning obligations (please be clear which policies you are commenting on).**

(optional) (maximum 3000 characters; count: 0)

**Public participation**

14. EU water Directives contain different requirements for public access to information and participation in decision making. Guidance also encourages more active public participation than the legal minimum. Your organisation may have been responsible for ensuring public participation or have taken part in the participation process. Please answer the following:

Are the requirements in EU Directives a sufficient legal basis for public participation in water management?

\* (compulsory)

Yes No Partially Do not know

Do you consider that the process of public consultation has effectively provided for a possibility to influence water management in your river basin/country?

\* (compulsory)

Yes No Partially Do not know

Do you consider public participation in water management in your river basin/country to be sufficient?

\* (compulsory)

Yes No Partially Do not know

Are there permanent structures for continuous involvement of stakeholders in your basin/for your sector?

\* (compulsory)

Yes No Partially Do not know

Is current guidance sufficient to promote active participation?

\* (compulsory)

Yes No Partially Do not know



**Please comment to explain any or all of your answers and make any recommendations you consider would improve public participation.**

(optional) (maximum 2000 characters; count: 0)

### ***Monitoring obligations***

**15. Directives contain obligations for Member States to monitor the various pressures and impacts acting on surface water and groundwater bodies. For the following Directives do you consider the monitoring obligations to be targeted at the right issues?**

	Yes	No	Partially	Do not know
Water Framework Directive * (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Groundwater Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Directive on environmental quality standards in the field of water policy* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Nitrates Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Urban Waste Water Treatment Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Floods Directive * (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Please comment to explain any or all of your answers and make any recommendations you consider would improve the monitoring obligations.**

(optional) (maximum 2000 characters; count: 0)

**Reporting obligations**

**16. Directives contain obligations for Member States to report to the European Commission on various aspects of their implementation. For the following Directives do you consider that the information that is reported adds value to understanding the challenges facing Europe's waters and/or how well EU water policy is implemented?**

	Yes	No	Partially	Do not know
Water Framework Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Groundwater Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Directive on environmental quality standards in the field of water policy* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Nitrates Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Urban Waste Water Treatment Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Floods Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Please comment to explain any or all of your answers (please be clear which policies you are commenting on) and make any recommendations you consider would add value to the reporting undertaken by Member States.**

(optional) (maximum 3000 characters; count: 0)

***Obligations in EU water policy***

**17. Many Directives contain obligations to control specific pressures on water bodies in order to achieve the objectives of that Directive with regard to water protection. Do you consider that the obligations under the following Directives are sufficient, insufficient or excessive in order to meet the objectives of those Directives?**

	Sufficient	Insufficient	Too excessive	Do not know
Water Framework Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Groundwater Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Directive on environmental quality standards in the field of water policy* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Nitrates Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Urban Waste Water Treatment Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Floods Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Please comment to explain any or all of your answers (please be clear to which Directive you are referring to), in particular providing any evidence for your answers.**

(optional) (maximum 3000 characters; count: 0)

**Costs and administrative burdens**

**18. The implementation of the water Directives has costs to public administrations, businesses and others. However, improved water conditions produces benefits to the public, businesses and the wider environment. Do you consider that the costs associated with the implementation of the following Directives are lower, of a similar proportion or higher than the benefits they provide?**

	Lower	Similar proportion	Higher	Do not know
Water Framework Directive * (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Groundwater Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Directive on environmental quality standards in the field of water policy* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Nitrates Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Urban Waste Water Treatment Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
Floods Directive* (compulsory)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

**Please comment to explain any or all of your answers and in particular highlight any specific obligations in a Directive where you may have concerns.**  
(optional) (maximum 3000 characters; count: 0)

**19. Implementing EU water law has many potential challenges in Member States. From your particular perspective, which of the following has been a specific challenge or constraint for effective implementation (note that any concerns arising from the obligations in the Directives themselves should be considered in the previous questions)?**

**Objectives of EU water policy not properly formulated\*** (compulsory)

**Yes**

**No**

**Partially**

**Do not know**

**Poor transposition into Member State law\*** (compulsory)

**Yes**            **No**            **Partially**            **Do not know**

**Lack of political will in the Member States\*** (compulsory)

**Yes**            **No**            **Partially**            **Do not know**

**Lack of integration of water policy objectives in other policy areas\*** (compulsory)

**Yes**            **No**            **Partially**            **Do not know**

**Lack of (or late) establishment of river basin authorities\*** (compulsory)

**Yes**            **No**            **Partially**            **Do not know**

**Lack of legal status of River Basin Management Plans\*** (compulsory)

**Yes**            **No**            **Partially**            **Do not know**

**Insufficient ability to control water demands\*** (compulsory)

**Yes**            **No**            **Partially**            **Do not know**

**Too many bodies involved in water decision making\*** (compulsory)

**Yes**            **No**            **Partially**            **Do not know**

**Poor co-ordination between river basin and national bodies\*** (compulsory)

**Yes**            **No**            **Partially**            **Do not know**

**Poor coordination with other authorities (spatial planning, agriculture, economic planning, etc)\*** (compulsory)

**Yes**            **No**            **Partially**            **Do not know**

**Poor co-ordination between authorities across national frontiers\*** (compulsory)

**Yes**            **No**            **Partially**            **Do not know**

**Lack of capacity in relevant public bodies\*** (compulsory)

**Yes**            **No**            **Partially**            **Do not know**

**Insufficient guidance to public bodies\*** (compulsory)

**Yes**            **No**            **Partially**            **Do not know**

**Poor stakeholder consultation\*** (compulsory)

**Yes**            **No**            **Partially**            **Do not know**

**Lack of political support\*** (compulsory)

**Yes**            **No**            **Partially**            **Do not know**

**Lack of support from some key stakeholders\*** (compulsory)

**Yes**            **No**            **Partially**            **Do not know**

**Strong resistance from some key stakeholders\*** (compulsory)

**Yes**            **No**            **Partially**            **Do not know**

**Insufficient finance\*** (compulsory)

**Yes**            **No**            **Partially**            **Do not know**

**Lack of sufficient understanding on pressures and impacts on water\*** (compulsory)

**Yes****No****Partially****Do not know**

**Please comment to explain any or all of your answers (please be clear as to which issue you are referring to) and in particular provide practical examples which you consider to be relevant.**

(optional) (maximum 3000 characters; count: 0)

**Way forward**

You are invited to upload a document, position paper, etc. elaborating on all the subjects questioned from you or your organisation.  
Addressing issues in EU water policy

**20. If you have identified issues, problems or gaps in any part of EU freshwater policy, different types of measures might be considered to be appropriate to address those problems. These could include:**

- Amending law or developing new law
- Developing new or improved guidance
- The Member States to reinforce their implementation of the current policy
- The Commission to take a stronger focus on enforcement of Member State obligations
- The Commission to take a stronger focus on coordination of different stakeholders
- More or better targeted EU funding
- Other

**For any specific problem(s) concerning the effective achievement of the objectives of EU water policy (please specify what these are), please comment on which measure(s) you consider might be appropriate to address those problems.**

(optional) (maximum 8000 characters; count: 0)