



**Brussels, 23 July 2018**

**Position Paper  
on the European Commission proposal for a Regulation on Minimum Requirements for  
Water Reuse (COM(2018) 337 final) of 25 May 2018**

**(Contribution to European Commission public consultation)**

The European Irrigation Association (EIA)<sup>1</sup>, which represents all professionals involved with the irrigation industry from the Agriculture, Golf and Turf sectors, fully supports the original multiple objectives of the European Commission for developing a harmonised regulatory framework for water reuse for irrigation at EU level. The EIA also supports that such regulatory framework is set in the legal format of Regulation which stipulates standardized approach to planning, implementation and validation of water reuse projects on equal terms in all Member States.

As contribution to the public consultation launched by the European Commission, the EIA wishes to point out a few observations on provisions set in the Regulation, where minimum requirements for reference values in reclaimed water as presented in Annex 1 to the Regulation present the major concern.

1. The supporting documents to the Regulation proposal, including a Science for Policy report (JRC 2017: Minimum quality requirements for water reuse in agricultural irrigation and aquifer recharge) and earlier Public Consultation Reports, identify public acceptance to be the key barrier for increase in waste water reuse for irrigation. Consequently, it can be observed that the Regulation proposal primarily aims at alleviating public health concerns by imposing stringent quality requirements for irrigation of food crops and mandatory provisions on risk management procedures.

While such focus is partly understandable, it should be noted that the same research shows highest rate of acceptance for the use of reclaimed water for irrigation of urban green spaces. Yet the Regulation proposal leaves this sector, as well as water reuse for irrigation of non-food crops, golf courses and sports turf areas, without any appropriate regulatory framework. Subordinating this type of projects to stern provisions of the Regulation in effect will leave this type of projects to arbitrary level of local requirements in terms of approval and compliance check procedures. Instead of its original intention to facilitate uptake in waste water reuse practice, the Regulation proposal itself - if adopted as such - will thus become a sort of a barrier, even for projects with inherently higher public acceptance.

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<sup>1</sup> The European Irrigation Association (EIA) is a not-for profit association of Belgian law, registered in the EU Transparency Register under n° 837818415965-04. The mission of the EIA is to improve the products, practices and services used to manage water resources and to contribute to the global improvement of the environment.

2. We share the concerns of many stakeholders in countries with existing regulations that the Regulation proposal, based on such stringent water quality demands, will be difficult to enforce and will inevitably impose significant additional costs on existing and future systems.

Definition of only four water reuse categories and explicit prescription of high disinfection standards in this context is in effect more a “one-size-fits-all” approach than the intended “fit-for-purpose” approach.

In this respect, the EIA strongly advises the Commission, the European Parliament and the Council to consider moving away from explicitly prescribing such stringent quality demands on water treatment system towards the regulatory framework which creates and controls the barriers to contamination throughout the entire process.

The Regulation as it is currently presented will inevitably favour expensive municipal projects supported with public funding schemes against cost effective projects in smaller communities and business sector. It will also result in significant cost increase for business operators in countries with lower water availability, thus hampering their equal opportunity to compete in the market.

3. Waste water reuse projects require complex understanding of water treatment process, water storage and distribution systems, irrigation systems design and operation, soil and crop science, agronomic practices, food processing and more. They also very much depend on proper economic analysis and socio-economic considerations which are all equally important parts of project development.

The EIA would like to draw the EU policy makers’ attention to the problem of significant differences in available knowledge and experience about water reuse for irrigation in various parts of the EU.

While the Regulation proposal tries to harmonise regulatory environments for the implementation of this type of projects, the approval process may be much more complicated in Member States without existing regulation due to lack of local know-how and practice.

The EIA therefore strongly advocates the need for development of consolidated guidelines and Best Management Practices for implementation of water reuse for irrigation projects, which would help to cover the gap and would further contribute to standardising the process and stimulating market uptake.