

WATER FRAMEWORK DIRECTIVE

Background

The Water Framework Directive (WFD) sets the ambitious goal of attaining "good ecological status" for Europe's rivers, lakes, groundwater bodies and coastal waters by not later than 2027.

In theory, the water body characterisation process has been completed and the relevant monitoring programmes have been elaborated.

The WFD has been implemented in a unique way; the European Commission and the Member States have established a Common Implementation Strategy (CIS¹) for the WFD. Many challenges and difficulties that occurred during the implementation have been common to all Member States.

Besides many of the European river basins are shared, crossing administrative and territorial borders. The CIS is designed to limit the risks of bad or unequal application of the Directive and subsequent dispute. The CIS has developed guidance documents and other supporting technical and scientific documents to assist in the practical implementation of the Directive. However, there is also a feeling that water users have not been sufficiently engaged in the development of the CIS.

¹ https://ec.europa.eu/environment/water/water-framework/objectives/implementation_en.htm



Challenges

- Although the WFD is a central component for the protection and restoration of water across Europe, it is clear that Member States need clear guidance at EU level to ensure compliance (risk of wrong interpretation/bad application of the directive on national level)
- A better coordination between all the different authorities/administrations dealing with the same water resources is needed.
- FEAP must become more closely involved in the development of WFD guidance. Although, in terms of scale, the economic and social impact of aquaculture is small relative to other water users (domestic consumption, irrigation, heavy industry) the significance of WFD to our sector is massive.
- Development of standardized best practice with regard to implementation of WFD across EU to ensure level of playing field within Europe. Members States should not be given the opportunity to have a free interpretation and operationalisation of the Directive.
- Aquaculture - being entirely water dependant - should be a key player in all discussions relating to developing EU water policy. Aquaculture is entirely dependant upon the aquatic ecosystem, and small changes that are introduced without due consideration of the consequent impact on our small sector could have a massive impact.
- Specific, positive aspects of the aquaculture sector should also be considered by EU water policy officers:
 - Aquaculture producers should be considered as the guardians/protectors of the aquatic ecosystem (require highest quality waters, monitor daily water parameters, settlement and filtration of water prior to return to the open aquatic ecosystem...)
 - Aquaculture production is not only about fish farming but also about restocking, recreational angling and habitat conservation/restoration.

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Regulatory constraints

Concerns raised on future potential restrictions on:

- Total phosphorus and Nitrogen level
- Discharges and sediments
- Water use restrictions (e.g. total percentage abstraction limits) and taxes on water use
- Escapees and parasites considered as pollutants
- Costs of enforcement of surveillance charged to fish farmers
- Fauna passage and continuity of the water course - obstacles to free water flow and passage of migratory species
- BOD content and Oxygen concentration
- Planning (authorities?) - limitation of access to the territory

Concerns with the quality objectives: good ecological state especially in regard to the fulfilment of the physico-chemical characters (e.g. France $\text{NH}_4=0.1$ mg in outflow!)

References:

[Commission Staff Working Document](#) on Water Framework Directive (WFD) and the Marine Strategy Framework Directive (MSFD) in relation to aquaculture.

FEAP actions

We need to continue to strive to remind the European Commission that WFD has a large impact on aquaculture. We are not, and will never be, the biggest player in the WFD agenda. As noted above, water companies, domestic and industrial users, navigation and energy industries, terrestrial farming - all have a higher consumptive water use and will have a greater impact on the ecological status that we do. What we must strive to achieve is to remind the European Commission that:

- We - aquaculture producers - exist
- The regulation has to be based on relevant parameters with defined acceptable level taking into consideration that all human activity have an environmental impact.
- We have a negligible environmental and ecological impact on the greater aquatic environment (we do not consumer water - we use it)
- Any regulation should be developed remembering the impact that it could have on aquatic food production
- Ensure that only appropriate issues are addressed through WFD legislation, making sure that this legislation is not erroneously used with regard to what might be considered aquatic animal health issues or containment, these issues being addressed by other more appropriate regulatory framework (AHL)¹

FEAP needs to be the link between DG Mare, DG Environment and DG Sanco on WFD & aquaculture.

¹ https://ec.europa.eu/food/animals/health/regulation_en

