

POSITION PAPER

European Drinking Water (EDW) position on the Revision of the Drinking Water Directive (DWD)

The Commission proposal on the revision of the DWD should lead to the development of a harmonised regulatory framework on materials and products in contact with drinking water.

The European Drinking Water (EDW) supports the Commission's ongoing work on the Revision of the Drinking Water Directive 98/83/EC (DWD). The legislative proposal that the Commission will publish by the end of 2017 should particularly address the lack of EU-wide harmonised provisions on materials and products in contact with drinking water.

As highlighted by the Commission evaluation of the DWD, materials and products in contact with drinking water are currently subject to a **non-harmonised European regulatory framework**. They must therefore meet national-specific requirements and provisions that differ from one Member State to another.

To move towards the development of **EU-wide harmonised provisions** ensuring the same high degree of human health protection for all European consumers, the EDW believes that the Commission proposal should:

- Empower the Commission to propose **legally binding measures** to harmonise EU requirements on the hygienic safety of materials in contact with drinking water.
- Ensure the development of common European **test methods and procedures for conformity assessment** of the hygienic safety of materials and products in contact with drinking water.

What is the issue?

The current lack of harmonised requirements on materials and product in contact with drinking water is the result of:

- Multiple national **requirements** aiming at ensuring protection of consumers' health and the quality of drinking water.
- Different national **test methods** and **procedures for conformity assessment** of the safety of materials and products in contact with drinking water.

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This situation stems from the current **article 10 of the DWD** which allows Member States to have different national approval systems for materials and products in contact with drinking water.¹ This has led to:

- Potentially **different levels of consumer protection across EU Member States**.
- **A fragmentation of the EU internal market** worsened by ineffective application of the mutual recognition principle.
- **Significant obstacles to the market uptake of innovative products, such as products with a longer lifetime**. As companies do not have the legal certainty that new products in contact with drinking water will be accepted by other EU Member States, they often lack appropriate incentives to invest in innovative products.
- **High administrative and financial burden, especially for Small and Medium Enterprises (SMEs)**. Companies need to test and assess the conformity of the same material or product multiple times when so required by different Member States. This situation results in higher costs for consumers and has a major impact on SMEs which, due to their limited resources, are at a competitive disadvantage in fulfilling the multiple requirements set by different Member States.
- **Competitive disadvantage of European manufacturers vis-à-vis third countries in the competition for extra-EU markets**. The existence of a harmonised regulatory framework and a EU product safety mark could be accepted by extra-EU countries, enhancing export opportunities for European companies.

European Drinking Water Recommendations

For all the above reasons, the EDW believes that the Revision of the Drinking Water Directive should lead to the development of a **harmonised regulatory framework** on materials and products in contact with drinking water ensuring that all European citizens benefit from a **high level of human health protection**.

The EDW recommends the Commission to revise the Drinking Water Directive to ensure that the safety of materials and products in contact with drinking water is regulated at the EU level.

This requires:

- The development of common European requirements ensuring protection of **consumers' health and the quality of drinking water**. In this respect, **the Drinking Water Directive should empower the Commission to propose specific legally binding measures on the**

¹ According to the [European Commission Evaluation of the Drinking Water Directive](#) (December 2016), 'the Article 10 provisions do not work well and represent a long term challenge to the provision of clean and healthy drinking water in the EU' (p.42).

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hygienic safety of materials and products in contact with drinking water. These legally binding measures should ensure that all European citizens benefit from the **same high level of human health protection**. Such measures should, ultimately, lead to the progressive development of an EU-wide harmonised list of substances allowed in the production of materials and products in contact with drinking water.

- The specification of common European **test methods and procedures for conformity assessment** of the hygienic safety of materials and products in contact with drinking water. The Commission should issue a mandate for the development of **EU-wide common procedures for conformity assessment and test methods**² on the hygienic safety of all materials and products in contact with drinking water.³ The DWD should then contain an explicit reference to the above-mentioned documents: test results for materials and products in contact with drinking water which are tested according to EU-wide procedures for conformity assessment and test methods should be presumed to be compliant with the provisions of the DWD.

About the European Drinking Water (EDW)

The European Drinking Water (EDW) is an alliance of currently 28 European trade associations representing industries involved with the supply of products or materials that are used in drinking water applications and connected to municipal drinking water supplies within the European Union (EU). This ranges, from raw materials suppliers to producers of pumps, water meters, pipes, valves, taps, fittings, water treatment, water heaters, catering equipment industry, seals, etc. and all types of materials, such as elastomers, metals, plastics, etc. The alliance is open to any industry association relevant to drinking water contact applications.

² These test methods could be based on harmonised test methods already produced by [CEN/TC164](#).

³ Specific procedures for conformity assessment and test methods should be developed at least for the 4 most common material categories used in drinking water applications (plastics, metals, elastomers and cement) and for assembled products composed of different materials.

European Drinking Water – Member associations



ANIMA
Federation of Association of
Mechanical and Engineering
Industry



AQUA
European Association of
Water Meters and Heat
Meters Manufacturers



AQUA EUROPA



BMA
Bathroom Manufacturers
Association



Branchehuset



British Water



CEDEC
European Committee of
Domestic Equipment
Manufacturers



CEIR
European Association for
the Taps and Valves
Industry



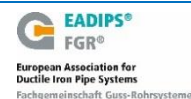
CES
Silicones Europe



CESA
Catering Equipment
Suppliers Association



DKI
Copper Alliance



EADIPS
European Association for
Ductile Iron Pipe Systems
Fachgemeinschaft Guss-Rohrsysteme



EFCEM
European Federation of
Catering Equipment
Manufacturers



EHI
European Heating Industry



ELISANA
European Light Stabilisers
and Antioxidants



ESA
European Sealing
Association



ETRMA
European Tyre & Rubber
Manufacturers' Association



Europump
The European Pump
Manufacturers Association



EVA
European Vending
Association



EWTA
European Water
Treatment Association

European Drinking Water











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 <p>FCA Food Contact Additive</p>	 <p>figawa</p>	 <p>KRV KUNSTSTOFFROHRVERBAND E.V.</p>	 <p>PlasticsEurope ASSOCIATION OF PLASTICS MANUFACTURERS</p>
<p>FCA Food Contact Additives (a Cefic Sector Group)</p>	<p>Figawa Association of Companies for Gas and Water Technologies</p>	<p>KRV Fachverband der Kunststoffrohrindustrie</p>	<p>PlasticsEurope</p>
 <p>SOIA Ion Exchange & Adsorbent Resins</p>	 <p>teppfa The European Plastic Pipes and Fittings Association Channeling Performance</p>	 <p>VDDW</p>	 <p>VRH VERBAND VERBODSTADIONEN IN DER HAUSELEKTROTECHNIK</p>
<p>SOIA Synthetic Organic Ion Exchangers and Adsorbents</p>	<p>TEPPFA The European Plastic Pipes and Fittings Association</p>	<p>VDDW Association of German water- and heat meters industry</p>	<p>VRH Association for Piping Systems Inside Buildings</p>
 <p>Water Quality Association</p>	 <p>ZVEI: Die Elektroindustrie</p>		
<p>WQA Water Quality Association</p>	<p>ZVEI German Electrical and Electronic Manufacturers' Association</p>		
