



POSITION PAPER

CEIR input on the Proposal for a Directive on the quality of water intended for human consumption (recast), COM(2017) 753 final

Brussels, 30 March 2018

CEIR supports EU-wide harmonised requirements on the materials and products in contact with drinking water. This harmonisation will benefit the safety of European consumers, while enhancing the competitiveness of the European industry and strengthening the single market.

Within the consortium European Drinking Water (EDW), which brings together the sectors of European industry concerned by this subject (30 associations), CEIR has developed concrete proposals to seize the opportunity of the current revision of the Drinking Water Directive (DWD) in order to modify the unsuccessful Article 10 from the current Directive, with the ultimate aim of building a functioning EU-wide regulatory system for all products and materials in contact with drinking water.

The current proposal has unfortunately not taken on board our requests to have harmonised hygienic requirements for materials and products in contact with drinking water within the DWD, preferring instead taking the option of the Construction Products Regulation (CPR) through the development of standards harmonising the assessment methods for construction products in contact with drinking water.

CEIR concerns

CEIR would like to express its concerns about this regulatory route which removes barriers only for construction products in contact with drinking water, but does not provide a harmonised solution for the other products which are not subject to CPR. Moreover, CPR does not allow for the development of positive lists, and can only regulate test methods.

We are convinced that the CPR not a viable option to resolve the current fragmentation in the market since it brings about only partial harmonisation and does not cover all products.

In addition, in the new Commission proposal the lead content is reduced from 10 to 5 µg/L without any motivation and without any impact assessment. Indeed, this topic has not been identified during the review process and the supporting studies performed by the Commission. The current threshold value of 10µg/L is in line with WHO recommendation, so we consider that any deviation from this value should be scientifically supported. On the other hand, to secure such a lead content in water would imply adjusting the composition and test procedure of materials in contact with the water. The industrial impacts of "zero lead" have not been assessed and could jeopardize the work of the 4MS on metals.

CEIR recommendations

CEIR requests that the Commission clarifies that the final objective of EU drinking water policy is the development of a fully harmonized regulatory framework on materials and products in contact with drinking water. If the DWD cannot accommodate this harmonisation, a specific standalone legislation based on Article 114 of the Treaty on the Functioning of the European Union, is essential to guarantee a uniform level of safety of drinking water for consumers, as well as to reduce burdens for the industry through common rules across the EU.

We call on the European Commission to start this work must as soon as possible cooperating with the relevant stakeholders. Our recommendation is to introduce a review clause in the current DWD, mandating the Commission to propose a dedicated regulation on products and materials in contact with drinking water.

Until such legislation is in place, CEIR fully supports the progress made so far in the field of standardisation. The current revision of standardisation request M/136 under the CPR should be regarded as a basis for the development of a future legislation and must include all necessary aspects. CEIR members are strongly involved in the activity of CEN TC 164, its working groups, and the corresponding national standardisation committees.

As part of the EDW Consortium, CEIR supports the EDW position and reply to the consultation on the recast of the DWD.

Conclusion

CEIR would like to reaffirm its willingness to work with the Commission and national authorities within the framework of this regulatory work, whose stakes for the industry are important. We will therefore continue engaging in this process, in support for better regulations with a view to achieving a European market for products and materials in contact with drinking water, for the benefit of consumer health, innovation and competitiveness. Only a harmonised regulatory framework setting EU-wide requirements for all products and materials in contact with drinking water will ensure a high level of protection of human health, while minimising costs and burdens for the European industry.



About CEIR

The European Association for the Taps and Valves Industry (CEIR) was formed in 1959 as the European federation of national manufacturer associations. CEIR gathers together a large number of European manufacturers in the field of valves and fittings. CEIR is composed of 13 national associations and 13 European corporate members: CEIR represents over 350 taps and valves manufacturers. CEIR supports the principles of a free economy and private enterprise in Europe as well as on a global basis. CEIR represents the common economic, technical and scientific interests of the European valve industries, towards international authorities and in economic and commercial circles.

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