



KVK-nr. 33300132

By email to chemicals@uba.de

Our reference  
20171204 RIWA answers to UBA position on PMT  
Subject  
UBA proposal Protecting the sources of our drinking water  
from mobile chemicals

Date  
4 December 2017  
Annex  
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Dear Sir or Madam,

This is the response of the Dutch association of River waterworks (RIWA) to the proposal of the German Environment Agency (UBA) titled '*Protecting the sources of our drinking water - A revised proposal for implementing criteria and an assessment procedure to identify Persistent, Mobile and Toxic (PMT) and very Persistent, very Mobile (vPvM) substances registered under REACH*<sup>1</sup>'. RIWA is part of the coalition of associations of waterworks along the main European rivers, representing the water protection and drinking water interests of more than 115 million people in 17 countries through which these rivers pass: Germany, Austria, Belgium, Bosnia-Herzegovina, France, Croatia, Liechtenstein, Luxembourg, the Netherlands, Montenegro, Romania, Serbia, Slovakia, Slovenia, Switzerland, the Czech Republic and Hungary. Around 170 water companies have joined forces in the form of our associations. The coalition has a common strategy and vision for the sustainable and prevention-oriented provision of drinking water. In light of this strategy we hereby present you our answers to the questions asked in Chapter 8 of your proposal. We thank UBA for recognising the European River Memorandum<sup>2</sup> (ERM) and quoting it in the preamble of its proposal.

We would also like to thank UBA for recognising the growing threat to the sources of Europe's drinking water and aquatic environments: the increasing number and volume of chemical substances that are being produced every day as Europe's chemical industry continues to innovate and develop new products and technologies. It is also our experience that the same intrinsic properties of substances that lead to persistence in the environment and mobility in the aquatic environment can influence the breakthrough behaviour into raw water, drinking water, wastewater and sewage water treatment, as such substances can be both persistent and mobile through the different treatment steps. We agree with UBA that a pre-emptive and precautionary approach is needed to prevent and minimize emissions into the environment.

We look forward to the initial list of substances registered under REACH that are considered to fulfil the PMT/vPvM criteria or are candidate PMT/vPvM substances that UBA has announced to publish late 2017.

<sup>1</sup> <https://www.umweltbundesamt.de/publikationen/protecting-the-sources-of-our-drinking-water-from>

<sup>2</sup> Memorandum regarding the protection of European rivers and watercourses in order to protect the provision of drinking water, [http://www.iawr.org/docs/publikation\\_sonstige/efg-memorandum\\_2013.pdf](http://www.iawr.org/docs/publikation_sonstige/efg-memorandum_2013.pdf)

**Question 1**

Does your MSCA, your organisation or you as an expert support the opinion of the German CA that REACH registered substances which are emitted into the environment and which have the intrinsic substance properties to be persistent in the environment, mobile in the aquatic environment, and toxic to environmental or human health (PMT substances) or very persistent in the environment and very mobile in the aquatic environment (vPvM substances) may cause a threat to the sources of our drinking water?

**Answer 1**

Yes, we do. RIWA and its ERM coalition partners have expressed their concerns about persistent and mobile organic compounds in a letter and a position paper to the European Commission in March 2017<sup>3</sup>. We are confronted with the analytical and monitoring data gap for these substances as is being recognised in the UBA proposal. Waterworks in Europe are also being confronted with several mobile (polar) substances in the aquatic environment that remained undetected before due to the lack of existing analytical techniques at that time. Since the drafting of our position paper new persistent mobile organic compounds have been detected. In the Netherlands we have experienced recent incidents involving the sudden detection of PMT/vPvM substances pyrazole, trifluoroacetate and FRD-902/FRD-903/GenX in rivers in concentrations that were exceeding the target values from our ERM.

**Question 2**

Does your MSCA, your organisation or you as an expert support this initiative of the German CA to establish PMT/vPvM criteria and an assessment procedure under REACH?

**Answer 2**

Yes, we do.

**Question 3**

Does your MSCA, your organisation or you as an expert give priority to the establishment of PMT/vPvM criteria?

**Answer 3**

Yes, we do.

**Question 4**

Does your MSCA, your organisation or you as an expert consider that the hazard caused by PMT/vPvM substances, if emitted into the environment, is comparable to the hazard caused by PBT/vPvB substances, as justified in section 4?

**Answer 4**

Yes, we do. The intrinsic properties of PMT/vPvM substances make it difficult or impossible to remove them sufficiently from drinking water.

**Question 5**

Does your MSCA, your organisation or you as an expert support the establishment of the same P and vP criteria set out in Annex XIII of the REACH regulation for the PMT/vPvM assessment as put forward in section 5.1?

**Answer 5**

We have no opinion on P and vP criteria as this is not our field of expertise. However, we do find (very) persistent substances in our sources for drinking water and drinking water after treatment, which supports the value of these criteria.

**Question 6**

Does your MSCA, your organisation or you as an expert support the establishment of the revised M and vM criteria for the PMT/vPvM assessment as put forward in section 5.2 and in the appendix?

**Answer 6**

We have no opinion on M and vM criteria as this is not our field of expertise. However, we do find (very) mobile substances in our sources for drinking water and drinking water after treatment, which supports the value of these criteria.

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<sup>3</sup> <https://goo.gl/FjBXud>

**Question 7**

Does your MSCA, your organisation or you as an expert support the establishment of the revised T criteria for the PMT/vPvM assessment as put forward in section 5.3?

**Answer 7**

We have no opinion on T criteria as this is not our field of expertise. We do however support the precautionary principle and have used the TTC-concept to derive the target values mentioned in the ERM.

**Question 8**

Do you see that the implementation of a PMT/vPvM assessment under REACH will bring benefits for manufacturers, importers and downstream users? If yes, which benefits in particular?

**Answer 8**

We have no opinion on this matter. However, we see PMT/vPvM substances appear in water as result of both emissions in the production stage as well as emission in the use/after use stage of products.

**Question 9**

Do you expect the implementation of a PMT/vPvM assessment under REACH to bring benefits for local authorities, water suppliers and producers of drinking water, and researchers? If yes, which benefits in particular?

**Answer 9**

Yes, we do. It is to the benefit of our members – waterworks in the Netherlands and Belgium – and our ERM coalition partners if the implementation of a PMT/vPvM assessment under REACH would prevent emissions of these substances into rivers. This would prevent having to:

- spend more energy and materials during the purification of drinking water;
- develop suitable analytical techniques and intensify monitoring;
- address the public about the presence of PMT/vPvM substances in their drinking water with the risk of losing confidence in its quality.

**Question 10**

Do you expect the implementation of a PMT/vPvM assessment under REACH to bring benefits for ECHA and Member State authorities? If yes, which benefits in particular?

**Answer 10**

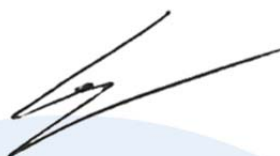
Yes, we do. The implementation of a PMT/vPvM assessment will strengthen REACH as it brings its aim in reach (as mentioned in the beginning of Chapter 4 of the proposal) and it contributes to the goals and targets of the European Union's (EU) Drinking Water Directive (98/83/EC, amended 2015/1787), the EU's Water Framework Directive (2000/60/EC) and the UN's Sustainable Development Goals (as mentioned in the preamble of the proposal). The environmental quality standards (EQS) that will be derived for PMT/vPvM substances should be in tune with the drinking water standards and reflect the precautionary principle.

With regards,

RIWA

A handwritten signature in black ink, appearing to be "M. van der Ploeg".

ir. Maarten P. van der Ploeg  
director RIWA-Meuse

A handwritten signature in black ink, appearing to be "G. Stroomberg".

dr. Gerard J. Stroomberg  
director RIWA-Rhine