WHAT FUTURE FOR EU'S WATER?

Indicator based assessment of the draft River Basin Management Plans under the EU Water Framework Directive

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Authors: Stefan Scheuer and Josselin Rouillard with input from Germana Canzi (europe, planet earth ltd - London, Brussels; info@europeplanetearth.eu; www.europeplanetearth.eu)

europe,
planet earth
London, Brussels

Editor responsible: John Hontelez, EEB
Design: www.okidokidesign.net
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FOREWORD

Much progress has been made in water protection in Europe over the last 30 years. But Europe‘s waters are still in need of increased efforts to get them clean and bring them back to their ecological health. This demand is expressed, not only by the scientific community and other experts, but to an ever increasing extent by EU’s citizens. A new Eurobarometer on water shows that as many as 2/3 of EU citizens say that quality and/or quantity of water is a serious problem. The activities of most concern to citizens are industrial and agricultural water use and pollution. On a positive note many EU citizens try to limit their own impact on the water environment. Many expressed a wish to be actively involved in influencing their water management, which is taking shape through the implementation of the EU Water Framework Directive, a new EU legislation establishing a legal framework to protect and restore clean water across Europe and ensure its long-term sustainable use.

In achieving these objectives, the roles of citizens and citizens’ groups will be crucial. Public input will help Member States balance environmental, economic and social priorities in their river basins. Getting citizens involved is a joint responsibility of the European Commission and Member States authorities but also organized civil society can play a role here.

The consultations on the draft River Basin Management Plans are an important opportunity for increased public involvement. Now that the official consultation period is coming to an end, it is critical that the input of Europe’s citizens and interested parties is taken on board and that the final plans lead to significant improvements in Europe’s water quality and sustainable use .

I welcome in particular contributions from stakeholders to the public debate on these draft plans and the future of EU water resources. This report is an important example in this respect.

Using this opportunity, I would also like to encourage citizens and all interested parties to plunge into the debate.

Peter Gammeltoft,
Head of Unit, Protection of Water and Marine Environment,
DG Environment, European Commission

Water is our most precious natural resource. It is vital for all life on the planet. Water systems such as rivers, lakes and wetlands provide immeasurable services to society: they provide our drinking supplies, they regulate our climate and detoxify our waste, they help produce our food, our electricity, our clothes as well as contributing to our aesthetic, educational, and spiritual needs. Water is the essence of life.

But our supplies of freshwater are threatened. The European Union has recognized this and has come up with new water policy reform in 2000. The Water Framework Directive provides a major once-in-a-generation opportunity to restore Europe's rivers, lakes and wetlands to ecological health by 2015 with each member state required to produce a River Basin Management Plan by 2009. These plans are now being presented and consulted with EU citizens in many of Europe's 110 river basin districts. But progress is not uniform. In at least 10 Member States, consultations have been delayed by several months or have not yet started. And where consultations have started, there are major concerns about their quality and effectiveness.

The EEB and WWF believe that most Member States still need to significantly step up their efforts to bring their use of water into a much better balance with economic development, consumer needs and the requirements of nature. The governments across Europe need to end subsidies that encourage wasteful use of water. In fact, water must become the central plank of efforts to tackle lasting food security, public health, energy provision and climate challenges.

We hope that this report will help policy makers to understand the central place that water should have in political decision-making and what they need to do about it. We trust that it will help water authorities and politicians to improve their water plans that must be presented by the end of this year. But European freshwater laws on their own are not sufficient. What is also required is the political will to make Europe's water policy reform a lasting success and give our most precious natural resource a sustainable future.

John Hontelez,
Secretary General, EEB

and

Tony Long,
Director, WWF European Policy Office

GLOSSARY AND ABBREVIATIONS

Body of water

Distinct element of water, for example a river stretch, showing similar ecological or anthropogenic features.

Good Status

The normative environmental objective for all bodies of water in the EU as defined by the Water Framework Directive (WFD – see below). In the case of surface water, Good Status comprises good ecological and chemical status and is measured against the reference case represented by pristine or close–to–pristine bodies of water. In the case of groundwater, Good Status includes good chemical and quantitative status and is measured against natural conditions and whether there is any negative impact on surface water or drinking water use depending on that groundwater. In general the Good Status has to be achieved for all bodies of water by 2015. If a number of criteria and conditions are met, the achievement can be postponed twice for a period of six years and alternatively a lower objective can be set.

Good Ecological Status (GES)

Ecological status of surface water bodies is described with biological, hydromorphological and general physico-chemical quality elements. Good ecological status is achieved when the biological quality elements (e.g. composition and abundance of fish or benthic invertebrate fauna) and general physico-chemical quality elements (e.g. oxygenation or nutrient condition) are only slightly deviating from a situation where there are no or only minimal human impacts.

Good Ecological Potential (GEP)

The default ecological restoration objective for Heavily Modified or Artificial Water Bodies (HMWB), e.g. water bodies which are physically and substantially changed in character (e.g. due to dams, dykes). The GEP is defined as a slight deviation of biological quality elements from the ones which would be achieved if all mitigation measures would be carried out which do not have a significant negative impact on the beneficiary of the physical alteration of the water body.

Heavily Modified Water Bodies (HMWB) (or artificial water bodies)

HMWB can be designated if water bodies are physically and substantially changed in character as a result of human activity and if removing the physical changes (e.g. hydropower dams or flood protection dykes) that would be necessary to restore them to the Good Status would have a serious negative impact on the beneficiary of the physical change (e.g. electricity production or human settlement). In addition no alternative that is significantly better from the environmental perspective is available due to technical or cost reasons (e.g. alternative electricity production/ energy saving or moving settlement).

River Basin District

National administrative area delineated by an individual river basin (e.g. Rhone, German Rhine, Austrian Danube) or made up of one or more neighbouring river basins (e.g. Scotland).

River Basin Management Plan (RBMP)

RBMPs are documents which present a characterisation of a river basin district, assessment of human pressures and impacts on the status of bodies of waters, economic analysis of water uses, monitoring networks, list of environmental objectives and justification of derogations from achieving good status by 2015 and programmes of measures to achieve the environmental objectives. Draft plans have to be open for consultation with public and interested parties till June 2009 and be finalised and adopted by December 2009.

Water Services

Traditionally all infrastructure for the purpose of public water supply and waste water treatment is understood as a water service. Under the WFD, however, the meaning is wider and includes water infrastructures, e.g. dams or dykes, that provide abstraction, impoundment, storage etc. for a wide range of activities including public water supply and waste water treatment but also power production, navigation and flood defence, as well as self-services.

Water Status

Description of the status of a body of water based on biological, chemical and hydromorphological quality elements.

Water Uses

According to WFD's Art 2.39 "Water services together with any other activity […] having a significant impact on the status of water. […]"

Water Framework Directive (WFD)

Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy[1].

[1] http://ec.europa.eu/environment/water/water-framework/index_en.html

1 INTRODUCTION

The EU Water Framework Directive (WFD) provides a once-in-a-generation opportunity to protect and restore Europe's rivers, lakes, transitional and coastal waters, groundwater and wetlands to ecological health by 2015. River Basin Management Plans (RBMPs) are the central tool setting out the specific objectives and actions necessary to achieve the Directive's objectives in an integrated and participatory way across the EU.

This report presents the findings of a survey about the quality of draft RBMPs in the European Union. This survey was carried out during January and February 2009 amongst the European Environmental Bureau (EEB) and WWF water networks in the EU.

Our survey comes at a time when governments and public authorities have to consult the public on the RBMPs before finalising them by end of 2009. They have to make up their mind about the water vision for each river basin, the restoration and protection objectives for each body of water and the measures to be put in place to achieve those objectives.

The challenge and urgency is significant: The EU is facing a water crisis caused by disruption of natural water cycle and aquatic ecosystems. According to official assessments in all 27 EU Member States in 2005, half of all bodies of water in the EU are at risk of failing to meet Good Status. Unsurprisingly, chemical pollution remains at a high level, as well as additional challenges emerge: not enough water is left in the rivers and wetlands, rivers and groundwater are disconnected from their land and too little space is left for their proper functioning and self-regulation. Rivers have, in a number of cases, lost their ability to support ecosystem functions and provide important services, such as providing fish and other food; water purification and storage; and protection from flooding and droughts. This comes with a huge economic cost to the general public today and a huge debt for future generations.

This situation may get worse because of climate change as it is expected to cause changes in precipitation patterns, more extreme floods and droughts, higher water temperatures, and increased species migration. It may also get worse due to our response to climate and energy challenges and ever increasing resource use, which will require more land and water (like biomass and hydropower). This will cause more stress to aquatic ecosystems and competition between water uses. Now more then ever we need a visionary and adaptive water management, which works towards a resilient and fully functional water cycle and aquatic ecosystems – the basis of all economic activities and human well-being.

Our survey is part of an ongoing civil society–based evaluation process which started in 2000[2]. This survey is informed by, and its results presented against, five headline indicators[3] developed by the EEB and WWF:

1. *Transparent and publicly owned water management*
2. *Reducing wastage and using water well*
3. *More space for living rivers*
4. *Healthy, safe water for people and nature*
5. *Visionary and adaptive water policies*

These indicators are raising the bar of the assessment to a high and integrated level which NGOs believe is necessary for successful water management. They are firmly based on the spirit and legal requirements of the WFD. They take up the emerging challenges of climate change, energy, food and loss of natural capital.

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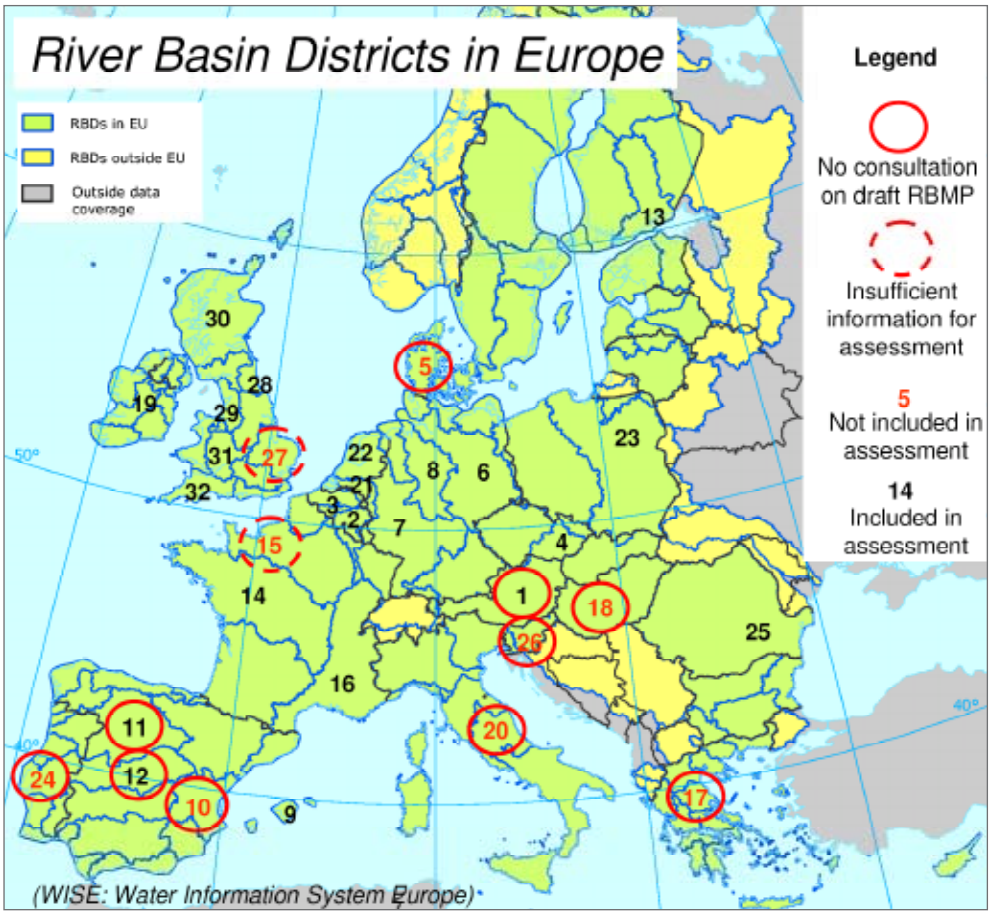
[2] 2000 and 2003 WWF's Water and Wetland Index (Phase 1 and 2) assessment of critical issues in water policy across Europe; 2004 EEB: 1st snapshot on draft WFD transposition; 2005 EEB and WWF : 2nd snapshot on final WFD transposition; 2006 EEB and WWF: 3rd snapshot on WFD economics; 2008 EEB and WWF: 4th snapshot on WFD consultation on significant water management issues

[3] 2008 EEB and WWF: Europe's water at the crossroads available at www.eeb.org with http://www.eeb.org/publication/2008/EuropeWaterCrossroads_EEBWWFbrochure _final.pdf and www.panda.org/eu

2 COVERAGE AND METHODOLOGY



	Country	Basin	Code		Country	Basin	Code
1	Austria	National	AT	17	Greece	National	HL
2	Belgium	Meuse	BE-ME	18	Hungary	National	HU
3	Belgium	Scheldt	BE-SC	19	Ireland	Shannon	IR-SH
4	Czech Republic	Morava	CZ-MO	20	Italy	National	IT
5	Denmark	National	DK	21	Netherlands	Meuse	NL-ME
6	Germany	Elbe	DE-EL	22	Netherlands	Rhine	NL-RN
7	Germany	Rhine	DE-RN	23	Poland	Vistula	PL-VI
8	Germany	Weser	DE-WE	24	Portugal	National	PT
9	Spain	Baleares	ES-BA	25	Romania	Arges-Vedea	RO-VE
10	Spain	Jucar	ES-JU	26	Slovenia	National	SL
11	Spain	Duero	ES-DU	27	UK	Anglian	UK-AN
12	Spain	El Tajo	ES-TA	28	UK	Northumbria	UK-NU
13	Finland	Kymijoki-Suomen	FI-KS	29	UK	North West	UK-NW
14	France	Loire-Bretagne	FR-LB	30	UK	Scotland	UK-SC
15	France	Orne	FR-OR	31	UK	Severn	UK-SE
16	France	Rhone	FR-RH	32	UK	South West	UK-SW

This report is based on the responses to a set of questions, given by NGO representatives active in developing the RBMPs. We checked responses for consistency and verified them with available documents or through correspondence with respondents. The result is a "snapshot": it gives a picture of the WFD implementation at a given time (January - March 2009). In total, we received 32 responses from 28 NGOs for 32 different River Basin Districts or countries (see *Annex 1:* Participants). 22 respondents answered the questionnaire based on draft RBMPs and in the remaining 10 cases either no plans were available or assessment was done based on preparatory documents for the draft RBMPs. In total 23 responses could be used for this assessment. See *Annex 2: Survey Methodology* and *Annex 3: "River Premier League" methodology* for more details.

The snapshot covers all European regions, but with a bias for North-West Europe due to the limited responses from NGOs from Central and Eastern Europe, as well as due to the fact that many South European countries are yet to start consultation, which means that no proper assessment for those countries was possible.

We also recognise a number of challenges in evaluating the quality of the draft RBMPs due to cultural bias in designing the questionnaire and answering it and multiple factors affecting public participation or proposed measures: institutional set up, historical context, cultural values, etc.

We believe, however, that it provides a solid basis for a number of conclusions and recommendations that we draw in this report.

3 MAIN FINDINGS

3.1 RIVER PREMIER LEAGUE

The table below presents our assessment of the performance of draft RBMPs against the five headline indicators for EU water management under the WFD.

NOTE:

The performance rating is only related to the quality of the process towards RBMPs and not to actual or predicted environmental outcomes. Data provided by authorities is insufficient to assess the level of environmental ambition or potential improvements across Europe. For example, the good performance rating for 'more space for rivers' relates to the fact that the authorities recognise the issue, collect the data and discuss potential measures. However, they may also propose many exemptions and cover limited number of areas. This means that the level of ambition might be too low in order to make a real difference in providing space for living rivers.

In those cases where information was not sufficient to support a robust assessment, the cells are given the colour grey and assessment (high, good, moderate, poor and bad) was carried out based on the available information. Where consultation has not started yet, in some cases, preparatory documents provided enough information for robust assessment.

Table 1: River Premier League*

Country	River basin	Transparent & publicly owned water management	Reducing wastage and using water well	More space for living rivers	Healthy and safe water	Visionary and adaptive water management
Austria	National	no consultation	moderate	moderate	moderate	moderate
Belgium	Meuse	bad	poor	moderate	moderate	moderate
Belgium	Scheldt	poor	moderate	moderate	moderate	poor
Czech Republic	Morava	bad	bad	poor	poor	poor
Germany	Elbe	moderate	good	moderate	poor	poor
Germany	Rhine	poor	poor	good	moderate	poor
Germany	Weser	poor	poor	poor	poor	poor
Spain	Baleares	poor	poor	moderate	bad	poor
Spain	Duero	no consultation	bad	moderate	bad	poor
Spain	El Tajo	no consultation	good	bad	poor	moderate
Finland	Kymijoki-Suomen	moderate	poor	poor	poor	poor
France	Loire-Bretagne	moderate	moderate	good	moderate	bad
France	Rhone	poor	moderate	moderate	poor	poor
Ireland	Shannon	poor	poor	bad	moderate	poor
Netherlands	Meuse	poor	poor	good	moderate	moderate
Netherlands	Rhine	poor	poor	good	moderate	moderate
Poland	Vistula	poor	moderate	poor	poor	poor
Romania	Arges-Vedea	poor	poor	moderate	moderate	poor
UK	Northumbria	poor	poor	poor	moderate	poor
UK	North West	poor	moderate	moderate	moderate	poor
UK	Scotland	moderate	moderate	moderate	poor	moderate
UK	Severn	moderate	poor	poor	good	moderate
UK	South West	poor	poor	poor	moderate	moderate
Average		poor	poor	moderate	moderate	poor

Legend

Lack of information (i) in the draft RBMP, (ii) in the alternative sources of information when consultations did not start or (iii) in the NGO answers

Performance rating:	high	good	moderate	poor	bad

*for more information see Annex 3: “River Premier League” methodology

3.2 GENERAL PERFORMANCE TOWARD THE FIVE HEADLINE INDICATORS

Our main findings about the performance of draft RBMPs and their development process in 23 river basins against the five headline indicators are:

1. Transparent and publicly owned water management:

Opening up of water management has not yet happened

RBMPs mostly do not reach the wider public. Only few countries really tried to do so, like in France, which resulted in 400,000 responses to the consultation from citizens. The involvement of organised stakeholders has not been easy either. In many cases RBMPs remain obscure: information is missing or inconsistent. We identify a systemic mismatch with what information is provided and what would be relevant for decision-making. Only a few RBMPs provide information on the restoration objectives for surface waters but in many cases authorities already suggest extending the 2015 deadline or setting lower objectives. Water status information is largely accessible online but very little information is provided about possible restoration measures and their appraisal. Many NGOs actively tried and keep on trying to contribute and influence the RBMPs but often are frustrated by the lack of progress.

2. Reducing wastage and using water well:

Falling groundwater levels are planned to be tackled but reducing water wastage is still a low priority

The picture is relatively positive for groundwater where the measures proposed in the draft RBMPs to halt and reverse falling groundwater levels are mostly judged by NGOs to be effective. However, authorities and governments are yet far from grasping the importance of overall minimising abstractions in order to restore and maintain aquatic ecosystem services. General water saving objectives are only established in 5 draft RBMPs. In conjunction with the water pricing measures which neither target the big water users, like agriculture, nor are designed to incentivise more efficient water consumption it is unlikely that significant reductions in water use will be achieved.

3. More space for rivers:

The issue is emerging in many river basins

The signs are good that more space might be created for rivers. Improving river ecology is not possible without more space. This should include flood management solutions, which allow rivers to have more space for flooding, and are often cheaper and more effective. Despite this positive development we still note a lack of firm targets, like the area or km of restored floodplains or wetlands, against which measures can be checked, as well as negative developments in basins where rivers still have some space which is threatened by unsustainable developments, mainly in Central, Eastern and Southern Europe.

4. Healthy, safe water for people and nature:

Pollution controls are established, but unclear whether sufficient

Traditional pollution control and chemical quality standard setting is continuing and is seen as effective in delivering the limited objectives they were designed for, although the scope of the proposed measures is still unclear and the generous use of exemptions is a cause for concern. But as long as we don't understand the impact of chemical cocktails and subtle effects like hormone interference, this is inadequate. With monitoring of biological indicators and stricter objectives for protected areas coming into place new pollution reduction will be required, including phasing out emissions of hazardous substances via upstream and product controls – a challenge for water management that has yet to be faced.

5. Visionary and adaptive water policies:

Lack of vision is evident

In general draft RBMPs lack the vision for adapting and working with a changing environment. Many draft RBMPs often follow outdated approaches of working against the rivers, reducing space and water, in order to satisfy ever growing demands in the field of energy, transport, housing and agriculture. These demands are often stated as a general overriding public interest, without any further discussions or assessments. While environmental NGOs favour a switch to renewable energy production, including hydropower, this should not be done if this risks losing important ecosystems and habitats and without assessing better environmental options like reducing energy consumption. Closely related policies, like flood risk management, are not always integrated with the draft RBMPs (e.g. this has been done in only 9 out of 23 river basins we assessed). Climate change is often dealt with in a reactive manner instead of proposing pro-active strategies to increase resilience of ecosystems and societies.

4. FINDINGS

Impact of the water management reform so far

Through the questionnaire we evaluated whether the WFD implementation process has had some impact already on water relevant developments. Overall, WFD started a reform process, by collecting information, encouraging member states to work across borders and engaging interested parties. In some cases environmental NGOs note that the WFD may have led to a change in flood protection programmes, where land use measures to manage flood risks are increasingly considered as part of the overall river basin management, although the influence of the Habitats Directive[4] is believed to be more significant (e.g. Belgium Scheldt). In UK Scotland, authorities rejected a planning application for a new hydropower development in 2003 on the basis of the WFD and the fact that the project would have led to deterioration of the river's status.

Many environmental NGOs identified developments which caused the deterioration of the water status after the year 2000 (AT, CZ-MO, DE-WE, ES-BA, ES-DU, ES-TA, FR-RH, IR-SH and UK-SC, for codes see page 10). Economic development based on increased production and transport is still the major driver for such deterioration as well as urbanisation of land leading to lower water quality, hydromorphological deterioration and increased risk of flooding. In Spain's Duero river basin, insufficient investment in wastewater treatment and increased water consumption is leading to increasingly polluted rivers and rivers drying up occasionally in periods of low rainfall.

Deterioration has also happened in other cases. In Belgium's Scheldt river basin for example, ecological and chemical-physical conditions of smaller streams have deteriorated; however, these have not been designated as water bodies due to their small size.

In Austria the respondent reported very strong lobbying from industry but also from federal agencies, pushing for an increase in hydropower production. Federal agencies actively support the development, planning and licensing of hydropower plants, with insufficient consideration of and respect for WFD objectives and procedural requirements.

QUOTES

Austria:
"Two proposed 18 MW hydropower plants in the Mur River underwent an environmental impact assessment. The ecological status of the Mur River is 3 and has the potential to achieve a level of 2 with the help of ecological measures such as alluvial forest and long free stretch of river. It also provides good possibilities for ecological flood protection. With the hydropower the ecological status will become 4-5. An exemption for deterioration has been issued (§104a Austrian law) with the argument of the overriding public interest (e.g. renewable energy)."

Czech Republic Morava:
"The Moravská Sázava was classified HMWB in advance so, officially, it cannot be counted as deterioration. A dam (polder) for about 12 million Euros was constructed. Sediment transport patterns and flooding has been altered, previous floodplain meadows and forests are now not flooded regularly anymore and the river is incised."

[4] Council Directive 92/43/EEC of 21 May 1992 on the conservation of natural habitats and of wild fauna and flora

4.1 INDICATOR 1: TRANSPARENT AND PUBLICLY OWNED WATER MANAGEMENT

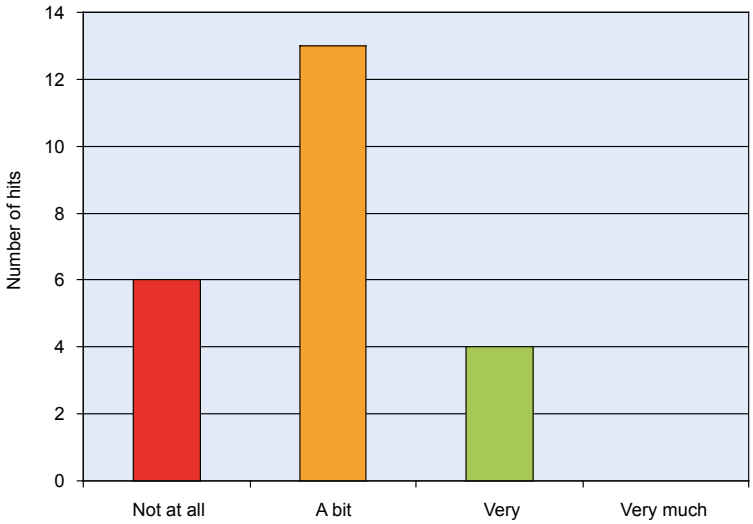
WHY IS THIS IMPORTANT?

Safe water remains one of the top environmental concerns of EU citizens. Water connects people with their environment and is central in defining our way of life. Issues such as water shortages, floods and droughts, and the impact of pollution on the everyday lives of people and their health, show that there is an urgent need to raise public awareness and involve the public in decision-making. Public involvement is essential if a new, sustainable approach to water management is to succeed.

NGOs observed that authorities improved communication with key stakeholders and there has been an increased effort in involving key stakeholders and in some cases the general public (e.g. France).

However, NGOs are largely not satisfied with the quality of the consultation process. NGOs are not convinced (in 16 of 23 cases) that the RBMPs consultation will create new ownership for the future water management measures and objectives. This is due to a lack of inclusion of NGOs and citizens in the process of designing the draft RBMP, to a lack of coherence and transparency in the objective–setting and appraisal of measures, and poor information about proposed budgets and capacities.

Figure 1: Respondents satisfaction with the RBMP consultation



4.1.1 Various means of participation

Consultation on the draft RBMPs is carried using a mix of methods and means:

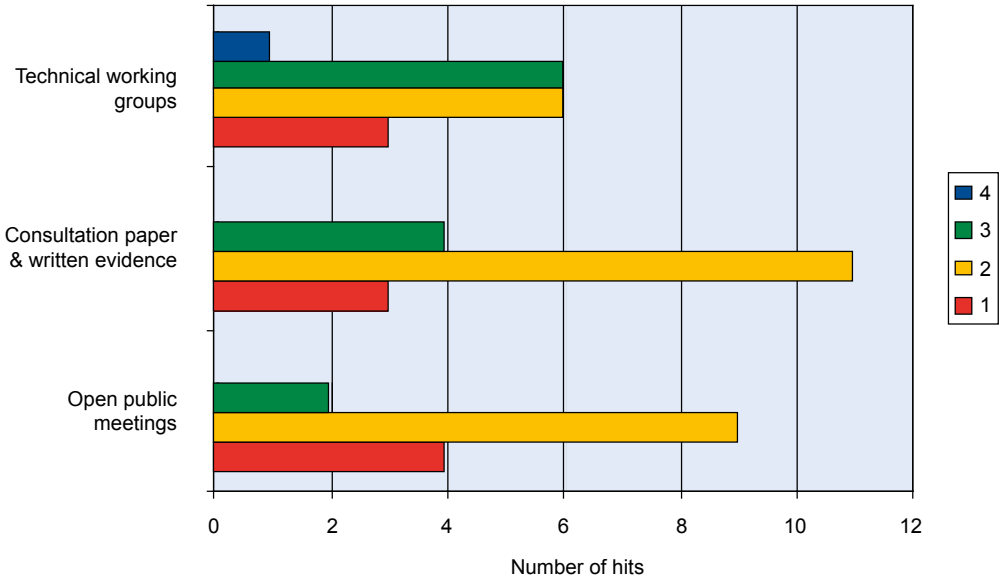
- 18 cases have meetings open to the general public. Spain Baleares and Poland Vistula did not have any.[5]
- 16 cases have technical working groups on specific aspects of the draft management plan. BE-ME, BE-SC, FR-LB, IR-SH and UK-SC specified that no technical working group was set up but are still involved in the general participative processes such as river basin committees.
- 18 cases carried out a written consultation exercise. In Czech Republic Morava no written consultation was provided.

[5] Open consultation meetings were organized in some regions of the Vistula Basin during the third stage of the consultation process

Environmental NGOs commented on the effectiveness of each means and method of consultation:

- Technical working groups are seen as the most effective tool for participating as it provides the opportunity to discuss issues and solutions against competing interests.
- Environmental NGOs are used to consultation process inviting written comments and see this as an effective channel to officially provide their position.
- Open public meetings are judged to be less effective, while being seen as important to get the general public and individual citizens involved.

Figure 2: Effectiveness of the consultations means (from 1=low to 4=high)



QUOTES

Belgium Scheldt: *"Official demands for input are sent to the "sub-basin-councils". There are 11 of them in Flanders and the members are local representatives from organised stakeholders. In addition there are sub-basin-boards (representatives from local water managers) and the (Flemish level) environmental council, agricultural council and socio-economic council. These councils work together to try to formulate a consensus-input. Councils can ask the administration for additional information."*

Czech Republic Morava: "*The promise to invite NGOs to working groups was not fulfilled."*

Netherlands Meuse: *"There is a lot of communication asking for active participation (e.g. advertising, public meetings). Technical working groups were mainly active in the phase of the preparation of the RBMPs; environmental NGOs were not involved. Still there is one working group active for the evaluation of WFD-plans and measures in relation with management plans for Natura 2000 areas where our organisation is involved."*

UK Scotland: *"There are National Advisory Group that consists of major stakeholders and Area Advisory Group consisting of interested local stakeholders."*

UK South West: *"There is not a culture or will on the part of the Agency to enable stakeholders to make meaningful input, except at a relatively superficial level."*

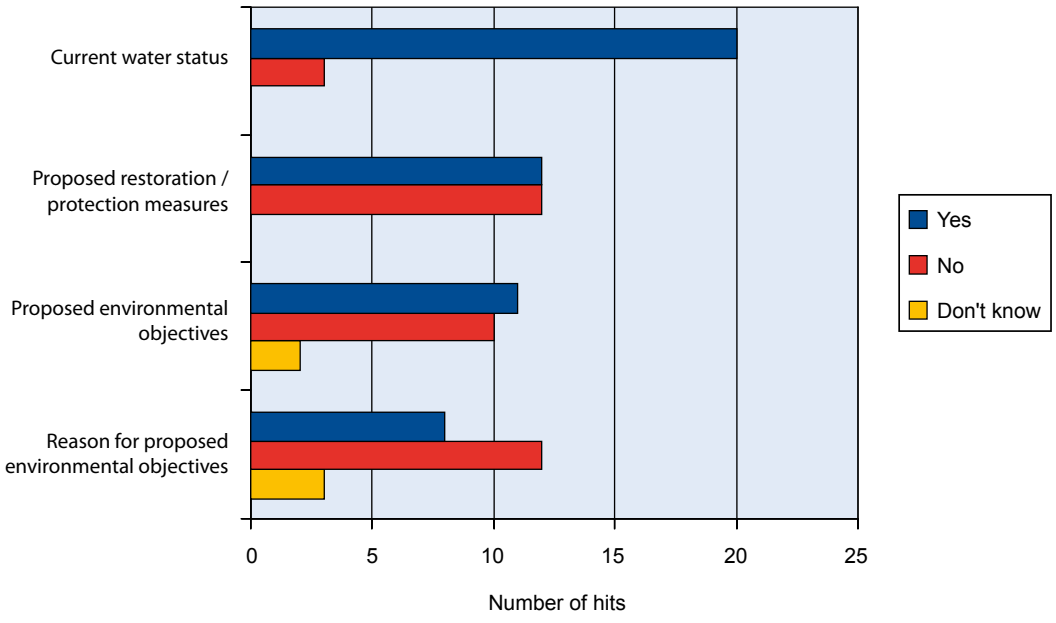
4.1.2 Quality of information provided

Most commonly used information is coming from background documents used to prepare the RBMPs. For example, from 2005 key documents are: river basin characterisation; risk assessment of failing Good Status; economic analysis of water uses and cost recovery. From 2007: consultations on significant water management issues; other specific studies; presentations of the authorities; information from the individual water bodies and international river basin authorities.

Many 2005 characterisation reports are currently being revised (e.g. Belgium Meuse) or have already been revised. Generally characterisation reports have been broadened in scope, for example by including smaller water bodies (e.g. Finland Kymijoki Suomen). Others have re-assessed previous estimations, for example to increase level of confidence in classification (e.g. UK Scotland). In many cases, there are still large numbers of un-classified water bodies. Other concerns arise due to unclear changes (e.g. Belgium Scheldt – see quotes) or an increase in the number of HMWBs (e.g. Germany Weser, UK Scotland).

Draft RBMP documents are accompanied by a draft programme of measures, annexes on methodology, maps and charts. Sometimes more specific information is available: analysis of the legal framework (e.g. Belgium Scheldt), a strategic environmental assessment for the program of measures (e.g. Germany Weser), the cost of WFD implementation or information on measures for a specific water body (e.g. Netherlands).

Figure 3: Information availability for a specific water body



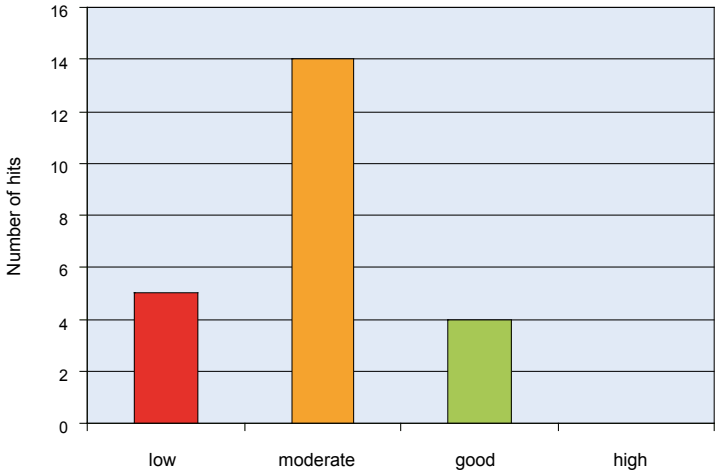
Generally a lot of information is available, in particular regarding characterisation (DE-EL, DE-RN, DE-WE, FR-LB, FR-RH, NL, UK-SC). Some NGOs also note the good quality of the information (e.g. France, Netherlands).

In many situations however, environmental NGOs find it difficult to navigate through the information. Problems with web-site design, long and complex documents and partial or missing information: environmental NGOs commonly are critical about the user-unfriendly format of information provided.

Overall, environmental NGOs rate the quality of information as moderate to low. Some criticise the technicality of the consultation documents which restrict the consultation process to experts (DE-NR, FI-KS, FR-LB, UK-SC, UK-SE, UK-SW, ES-BA), the lack of feedback (France Rhone), the

lack of clarity of consultation documents or lack of information in them (Finland Kymijoki Suomen, UK Severn), the lack of transparency in the decision-making process (UK Northumbria) or the poor leadership and facilitation skills of the responsible authorities (Spain Duero and UK South West). In the economic analyses, the assessment of cost-effectiveness and disproportionate costs of measures, exemptions from the principle that costs of water services are to be recovered from the respective users, are absent or incomplete (e.g. BE, CZ-MO, ES-BA, ES-DU, NL-ME, NL-RN, UK). Detailed information for measures at the local level is lacking (e.g. DE-EL, DE-RN, DE-WE, UK).

Figure 4: Quality of information



QUOTES

Belgium Scheldt:
"One very striking change is the deletion of a point source of ground water pollution (intrusion of salt wastewater from surface water into the soil) as a key problem - on the basis of a study paid by the polluting company - especially since the administration responsible for groundwater management has always criticised this study …"

Czech Republic Morava:
"Responsible authorities just put the draft text on the web. Lists with tabs and data and proposed measures were very hard to access - it is necessary to download approximately 300 different tabs, texts and pictures without description and just with numbers. The online structured version does not allow opening it. It took me 5 days to go through it. I cannot imagine broader public reading it."

Germany Weser:
"At the start of the plans much information has been missing or incorrect in the plans - it will be updated in February. Revisions lead to 75,8% HMWB and AWB now compared to around 30% in 2004 (this is an estimation because no official data was available in Lower Saxony in 2004)."

France Rhone:
"Quality of information is high and very complete. However presentation is poor and information is complex and not easy to find. Public questionnaires received very poor returns and there hasn't been good communication at local level."

UK Northumbria:
"As a general issue it has been very difficult to get a clear picture of what is happening. Information is variably available and normally in a difficult form to apply in any practical manner."

UK Scotland:
"There is lack of access to any economic information, such as the revised economic analysis of water use, assessment of cost-effectiveness, or other economic analysis. There is also no provision of technical information in accessible format, such as the UK Technical Advisory Group methodology, or detail access to the classification of HMWBs. The number of HMWBs has also risen from 148 HM rivers in 2007 (SWMIs) to 267 HM rivers in 2008. Number of HM lochs has risen from 71 lochs in 2007 SWMIs) to 97 in 2008."

UK South West:
"There is a vast amount of information available but extremely difficult to access. Its availability is more a function of the inquirer's persistence than the easy availability of the information. Maps of water bodies take long time to download and are difficult to work with."

4.1.3 Lack of transparent objective setting and appraisal of measures

In most cases it is possible to find information about the status of a specific water body. But information on proposed objectives and measures is available in very few cases only. NGOs consider that often the information provided by the draft RBMPs is fragmented, poorly presented and transparency needs improving.

Draft RBMPs provided quantitative information on the 2015 objectives in 12 cases for groundwater and only in 10 cases for surface water. River basins and countries that provide no or unclear information either for surface water or groundwater are AT, BE-ME, BE-SC, DE-RN, DE-WE, ES-DU, ES-TA, FR-RH, PL-VI, RO-VE and UK-NU.

Draft RBMPs provide information on the confidence of achieving the 2015 objectives in 5 cases (DE-WE, IR-SH, UK-NU, UK-NW and UK-SE) for surface water and in 3 cases (Czech Republic Morava, Finland Kymijoki Suomen, UK North West) for groundwater, confidence is systematically expressed as low or high. In Germany Weser and UK Severn, draft RBMPs are very pessimistic and targets are not achievable because of lack of knowledge and disproportionate cost.

Draft RBMPs suggest setting lower objectives in 10 cases (out of 23) for surface water (CZ-MO, DE-RN, DE-WE, FR-LB, IR-SH, NL-ME, NL-RN, UK-NW, UK-SE, UK-SW) and 7 cases (out of 23) for groundwater (DE-EL, DE-NR, ES-BA, IR-SH, PL-VI, UK-NW, UK-SC) . Lower objectives are proposed for various reasons:

- historical industrial pollution;
- canalised water bodies;
- harmful pollutants; or
- disproportionate cost of restoration measures.

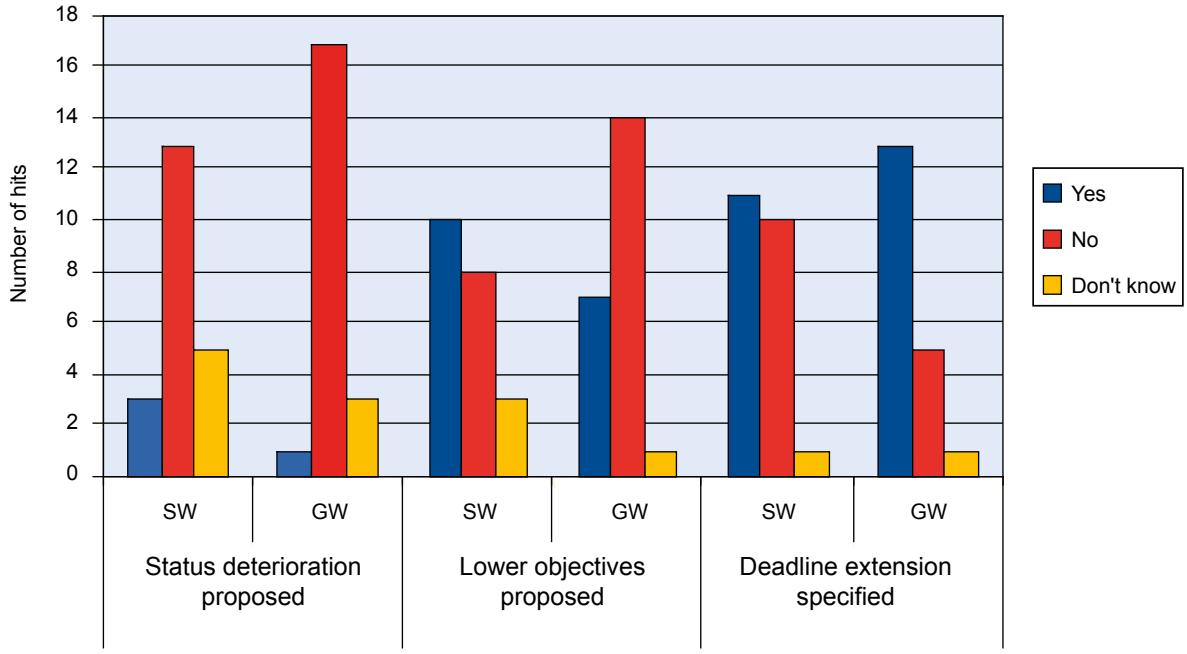
In UK Scotland lower objectives are used when measures are deemed too expensive to achieve the Good Status by 2015 (and thus to spread the cost of restoration until 2027).

In UK South West lower objectives are set for time after 2027, when the third and last RBMPs end, due to places suffering from pollution caused by mine waters.

Very few draft RBMPs specifically suggest deterioration status for water bodies: 1 case for groundwater (UK Scotland) and 3 cases for surface water (Czech Republic Morava, France Loire Bretagne, UK Scotland).

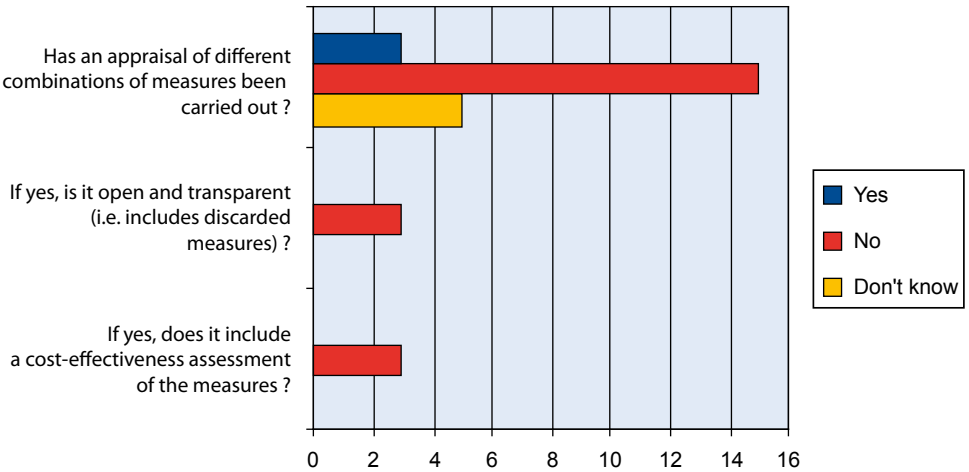
Extensive use is made of WFD provisions for exemptions from reaching the objectives. In 11 cases (out of 23) for surface water (DE, ES-BA, ES-DU, FI-KS, FR-LB, IR-SH, UK-NW, UK-SE, UK-SW) and 13 cases (out of 23) for groundwater (DE, ES-BA, ES-TA, FI-KS, FR-LB, IR-SH, NL-ME, UK-NU, UK-NE, UK-SC, UK-SW), an extension of deadlines to 2021 or even 2027 is proposed for different reasons. These include claims about lack of knowledge, technical feasibility, or disproportionate cost in particular due to nitrate pollution and morphological changes and response–time from ecosystems. In some cases time extensions are given with no precision on what the new deadline is (e.g. Belgium, Scotland, Netherlands).

Figure 5: Exemptions from Good Status in 2015 (SW= Surface Water, GW=Groundwater)



An appraisal of different combination of measures is clearly presented in only 3 cases (out of 23): Czech Republic Morava, Germany Rhine and Finland Kymijoki Suomen. None are judged as being open or transparent and none present a cost-effectiveness analysis of the combination of measures. Measures seem to be based on practicality and expert judgments (e.g. UK Scotland). Sometimes, an economic analysis has been performed but mainly at national and river basin district level (e.g. England and Wales), only for a few measures (e.g. Finland Kymijoki Suomen, Czech Republic Morava), presented or drafted in a non-transparent way (e.g. Belgium Scheldt) or providing only a limited number of alternative options (e.g. Czech Republic Morava, Germany Elbe, UK Scotland).

Figure 6: Measures Appraisal



QUOTES

Czech Republic Morava:
"Overall only one potential measure is presented. Only in one case, there was public resistance to the building of a new dam, so a solution without dam was proposed. Otherwise in the case of another dam under preparation there is no alternative proposition."

Germany Elbe:
"Measures follow a standardized typology naming 99 types of measures that was developed by the LAWA (inter-state working group on water issues). The measure types give an idea what is planned, but leave a lot of room and need to be specified later on. An exception is Thüringen, where different combinations of measures were compared."

Netherlands Meuse:
"In the annexes of the RBMPs there are indications of the reasons for deadline extensions. However, no quantitative appraisal of costs on discarded measures has been made nor specific information has been given about the reasons for discarding."

UK Scotland:
"Only existing measures were included in the program of measures. There is no assessment of combination of measures, or cost-effectiveness. It was decided on the basis of practicality and expert judgment."

Belgium Scheldt:
"Since there is deadline extension for ALL surface WB's, there is also one for the protected area's…. There are no objectives for 2021 or 2027, only a graph suggesting all will be fine in 2027. They are motivated by referring to "technical feasibility". They did feed measures into a water quality model for each WB and the model predicted no water bodies will reach target. The way this model is used is very unclear. Important measures have NOT been included into the model."

Spain Duero:
"The consultation states: 'ecological objectives are an impediment for the agricultural development and of new infrastructures for the satisfaction of the demands."

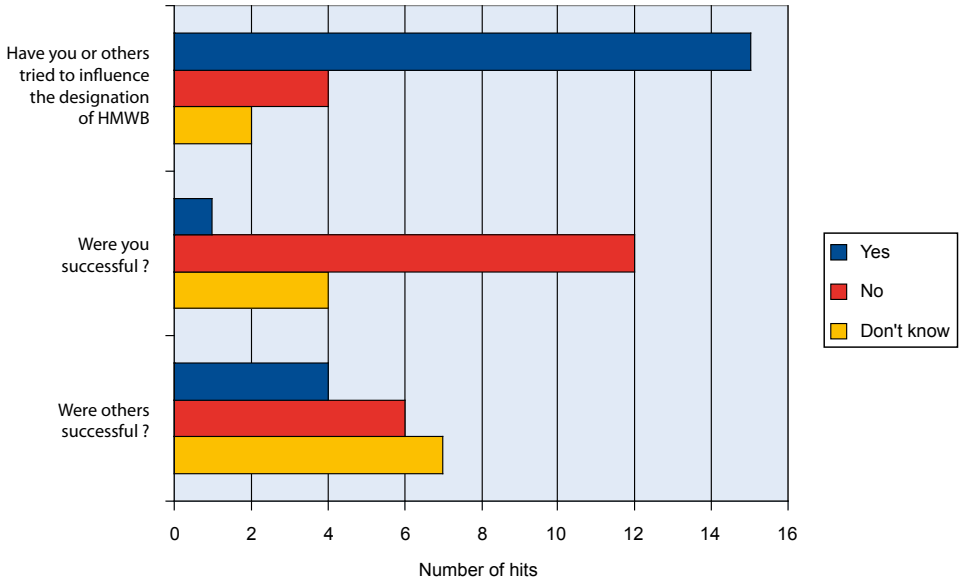
Finland Kymijoki Suomen:
"There are combinations of measures represented, but only on the level of example. Also the costs of the measures have been estimated, but there is not specific cost effectiveness assessment […]. The cost-effectiveness assessment will be made more detailed on the next round / next RBMP of WFD."

Germany Elbe:
"While for example the overall goal of only 14% of total river length in good status by 2015 is certainly insufficient, there are quite a number of positive objectives (e.g. a plan for establishing better river continuity in the most important rivers), even if they are in many cases not as ambitious and precise as we would like to see them. In some states, objective setting is rather imprecise (e.g. Berlin), in others we see specific goals for specific water bodies (e.g. in Thuringia)."

4.1.4 Lack of influence

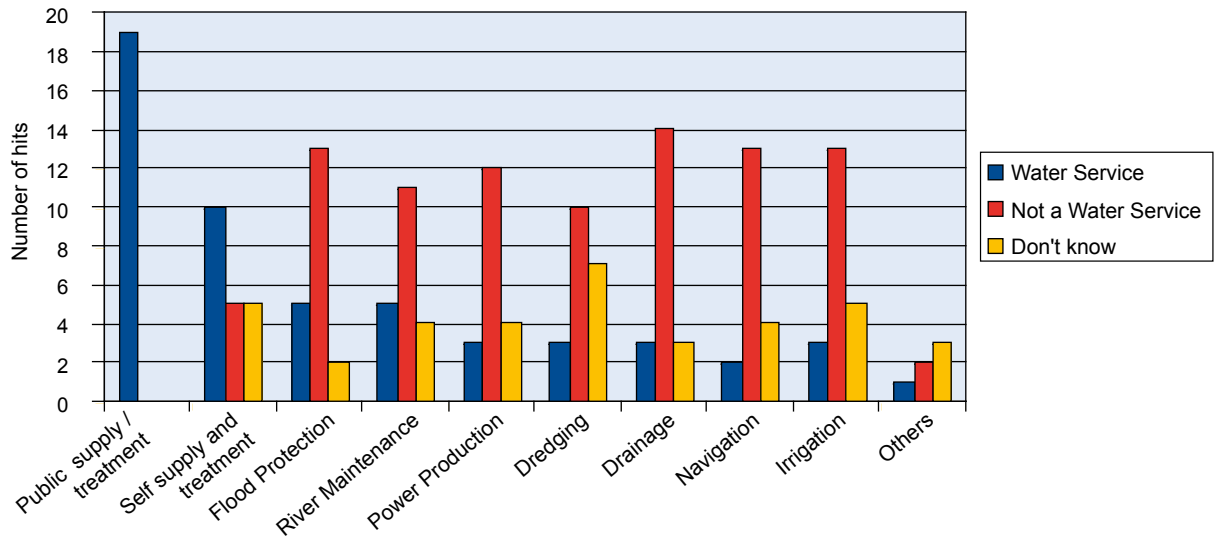
NGOs state that their input has often not been taken on board. This can be demonstrated by the designation process of the HMWB. Despite the fact that in most cases NGOs brought arguments and evidence to change the designation process, so far only one case (Ireland) has been successful. Most environmental NGOs are concerned that authorities want to extend HMWB in order to maintain traditional approaches to water management and reduce costs of infrastructure removal and restoration.

Figure 7: Influencing the designation of HMWB



A second case of frustration arises from the narrow definition of what constitutes a “water service”. While the issue has been highlighted by environmental NGOs for several years, most draft RBMPs still apply a very narrow definition and in an inconsistent way. Public water supply and waste water treatment are identified as water services in all cases. Self-services, such as abstraction for farming from private boreholes or river pumping, are not identified systematically. Flood protection infrastructure and river maintenance are identified as water services only in 5 cases. Infrastructure for hydropower (Spain El Tajo, UK Scotland, UK South West), drainage (Czech Republic Morava, Romania Arges-Vedea, UK South West) or irrigation (Spain Baleares, Spain El Tajo, Romania Arges-Vedea) are identified as a service only in 3 cases each, navigation in 2 cases (Spain El Tajo and UK South West).

Figure 8: Defining water services



QUOTES

Czech Republic Morava:
"We have sent our comments and proposals on SWMI, but none of them was seriously taken into account, we were promised to be invited to the working group for the RBMP preparation but we were not at the end. We could just send our comments again. The large rivers´ management company ("Povodi") are supporting traditional engineering approaches (e.g. river engineering and dam building schemes). They do not have the skills to handle entire catchments and floodplains such as landscape ecology and river dynamics knowledge."

Belgium Meuse:
"If we consider that this consultation becomes a pre-consultation work, and that it is partly due to our action, this could be seen as a positive influence: we've stressed all missing points of the pre-project and our position document has been sent to the authorities"[6].

Finland Kymijoki Suomen:
"We succeeded for instance in bringing up issues regarding urban planning/ land use / storm water treatment to SWMI and RBMP."

UK Scotland:
"NGOs managed to change the contents/wording of specific sections in the draft Plan."

4.1.5 Poor budgeting of RBMPs and evaluation of economic instruments

Eight draft RBMPs are accompanied by a budget (BE-SC, CZ-MO, ES-BA, FR-RH, NL-ME, NL-RN, PL-VI, UK-SC). In Finland Kymijoki Suomen, yearly estimated costs are provided until 2015 for some measures and for sectors. In UK Scotland a regulatory impact assessment is available. There are many concerns however with the available budgets as they are incomplete and rely on questionable assumptions (e.g. Belgium Scheldt).

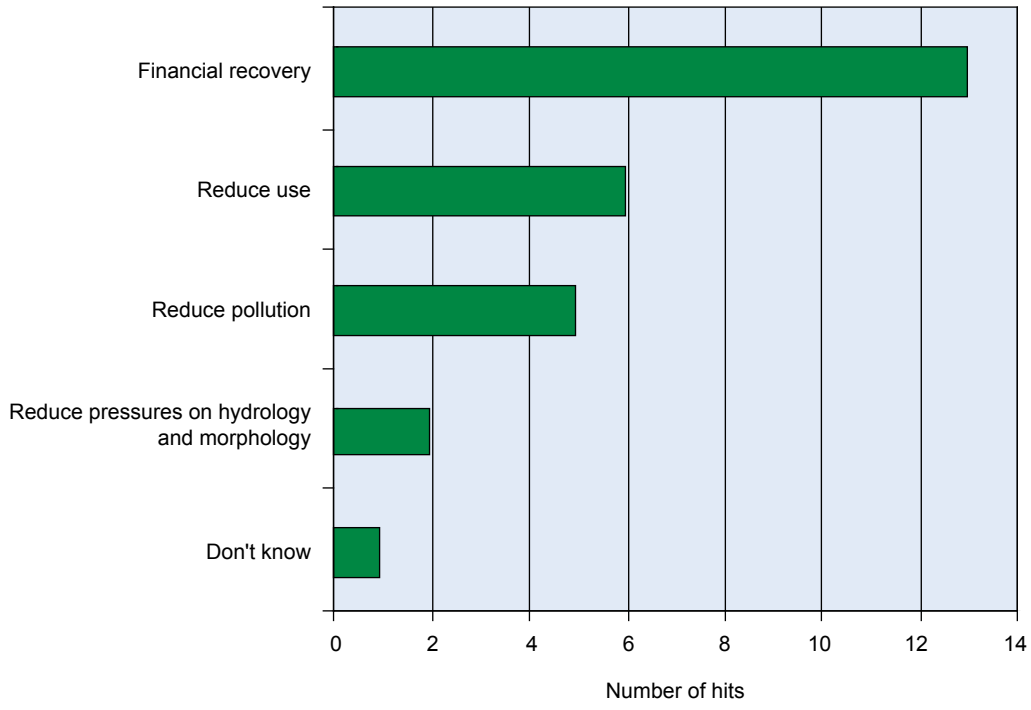
Eleven draft RBMPs appear to be not accompanied by a budget (BE-ME, DE-EL, DE-WE, FI-KS, FR-LB, IR-SH, RO-VE, UK-NU, UK-NW, UK-SE, UK SW). Some respondents specify that some costs and benefits are however available but no overall budget for the RBMP measures.

Many repondents noted that it is difficult to judge the scope and effectiveness of proposed measures. This may be a result of incomplete economic analysis in the selection of measures (see above) or from poor application of economic instruments.

Water pricing is mentioned in most draft RBMPs. Its main purpose is the recovery of the financial costs of water services. In very few cases they include environmental and resource costs. The purpose is to reduce water use in 6 cases (BE-SC, DE-EL, PL-VI, UK-SC, UK-SE, UK-NW), pollution in 5 cases (BE-SC, PL-VI, UK-SC, UK-SE, UK-NW) and hydro-morphological pressure in 2 cases (UK Scotland, UK South West). Some draft RBMPs specify that charges will be revised and that environmental and resource costs will be included or water use efficiency be promoted.

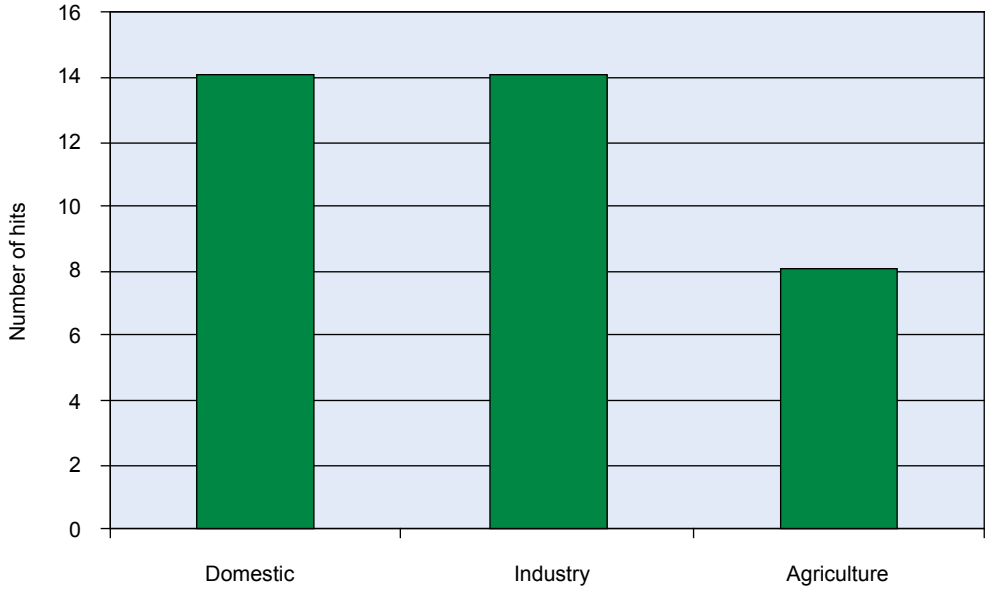
[6] After criticism from NGOs about the quality of the consultation the process has been re-launched by authorities.

Figure 9: Main objective of water pricing measures



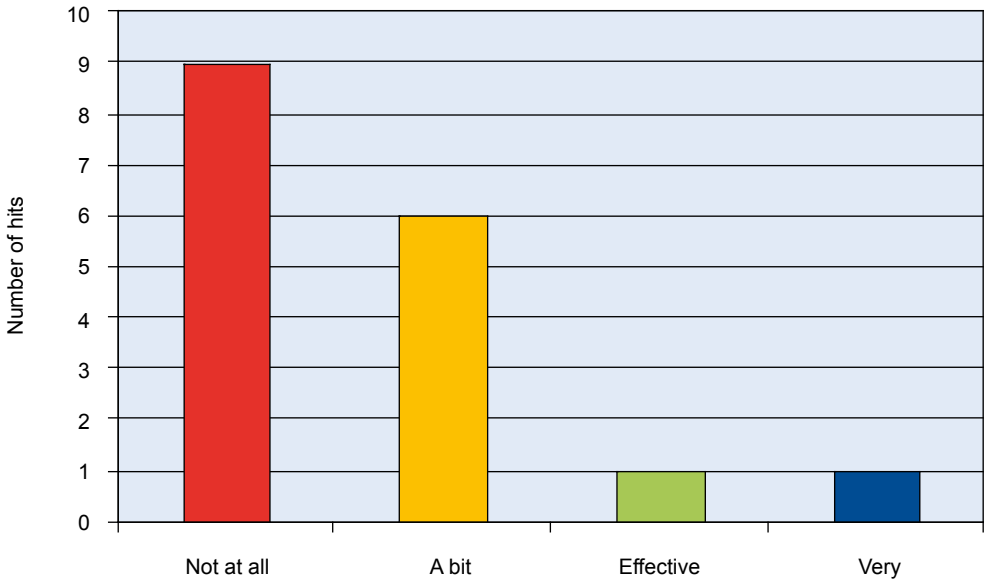
The main target sectors are domestic and industrial users. Agriculture is targeted less frequently, only in 6 cases.

Figure 10: Sectors addressed by water pricing measure



Environmental NGOs are very sceptical about the effectiveness of proposed economic instruments in modifying unsustainable practices (14 answered not effective at all or a bit, in UK Scotland proposed water pricing are judged to be effective and in Germany Elbe existing water pricing measures are judged as very effective for public water supply and treatment). With poor budgeting, little commitment and inadequate use of economic tools, there are also doubts whether the authorities will have enough resources to implement the measures.

Figure 11: Effectiveness of water pricing measures



QUOTES

Belgium Meuse:
"As objectives and budget are unknown, it is impossible to check if the proposed measures are sufficient to match the objectives (especially in zones where the risk analysis showed that the good status will not be reached in 2015)."

Belgium Scheldt:
"We have big questions regarding this budget; for too many measures, there seems to be no budget, for other measures, the budget is extremely high because of questionable assumptions in the plan; the calculation of benefits is an extrapolation from one study for a sub-basin and not representative."

Germany Elbe:
"Public participation is regarded as a technical reason to delay objective achievement."

UK Northumbria:
"Only very broad headline figures of costs and (some) benefits for implementing different scenarios."

UK North West:
"There is no budget given under the specific section on 'economic analysis of water use'. This section does detail costs of providing water services, revenues and financial cost recovery but it doesn't give a budget for the RBMP measures."

4.2 INDICATOR 2: REDUCING WASTAGE AND USING WATER WELL

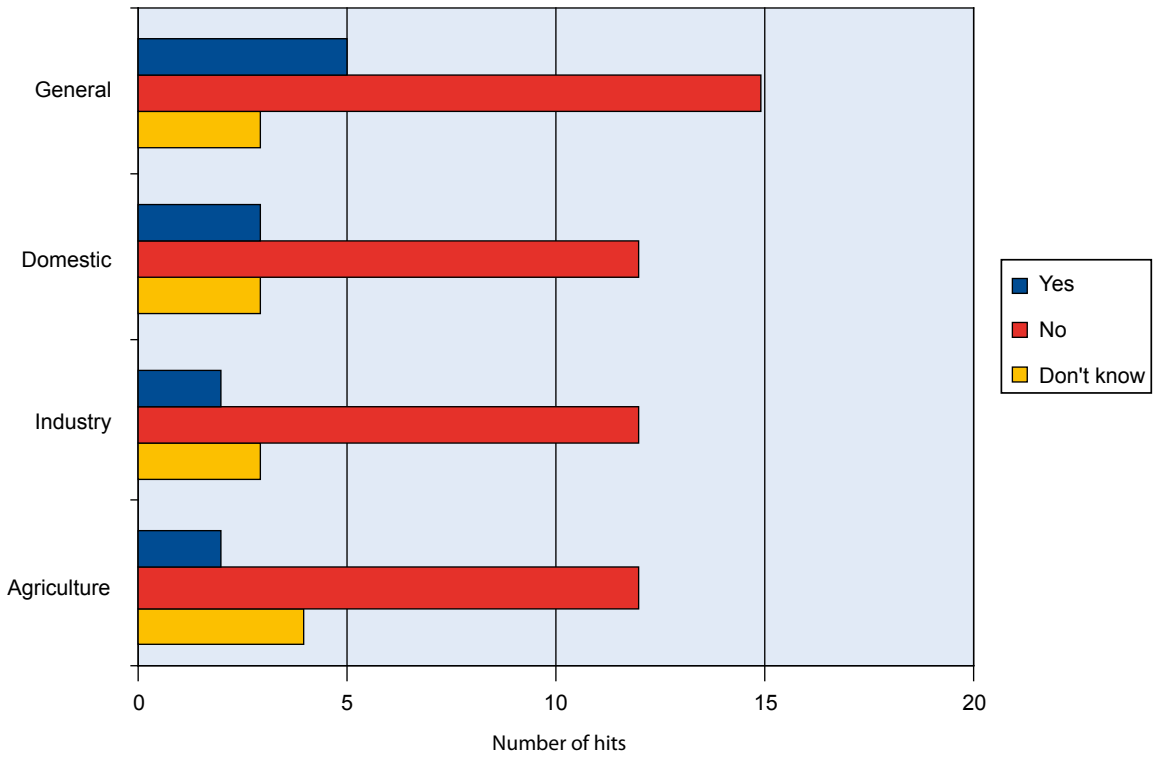
WHY IS IT IMPORTANT?

Water is a finite resource. What is consumed or polluted upstream is then absent or unusable downstream – whether in southern Spain or alpine Austria. Very little can be done to increase the amount of water available for human use, and doing so requires significant amounts of space, energy and other natural resources. Reducing water use and managing water demand is thus the inherently better option. Up to 40% of water currently used in the EU can be saved through technological improvements alone.

Water saving policies and planning are insufficiently developed in the draft RBMPs. In 5 cases (out of 23) general water saving objectives are proposed (ES-TA, FR-LB, PL-VI, UK-SE, UK-SW). UK Scotland provides specific objectives for agriculture. In France Loire Bretagne, an "efficiency" objective is proposed for drinking water supply (75% for rural areas, 85% for urban areas) and a water saving objective for agriculture is set but is only attached to new storage reservoirs. For UK Severn and UK South West, objectives are not set in the RBMPs but in water efficiency plans of companies.

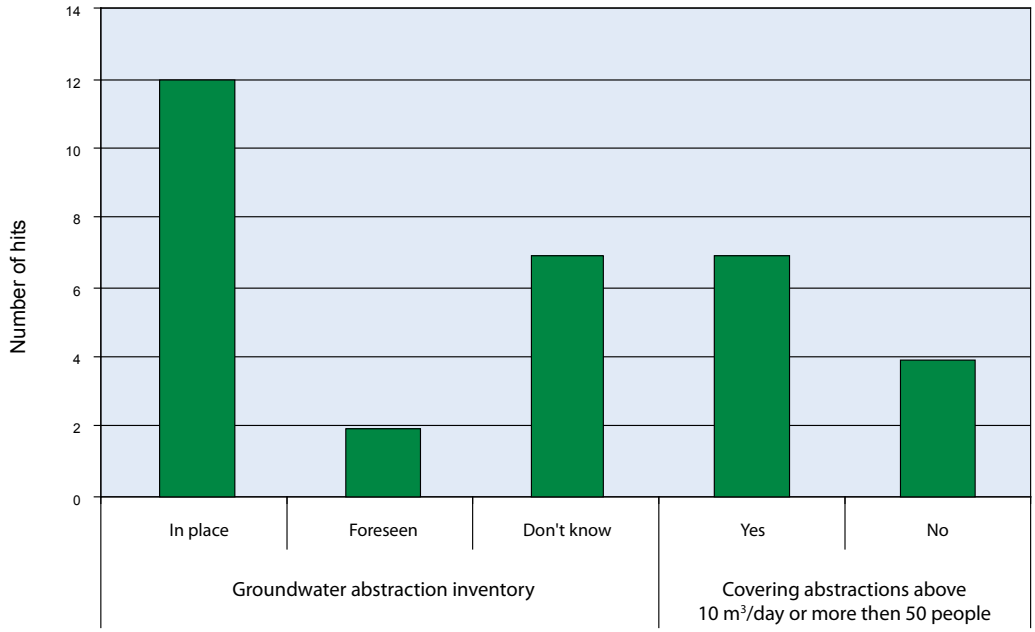
In the majority of cases, no water saving objectives are set. In Belgium Scheldt, water contingents will be calculated for main water bodies, in particular groundwater bodies, but these are not water saving objectives. UK Northumbria refers to the need for education and information measures to encourage water saving and demand management but no objective is set.

Figure 12: Water saving objectives in the draft RBMPs



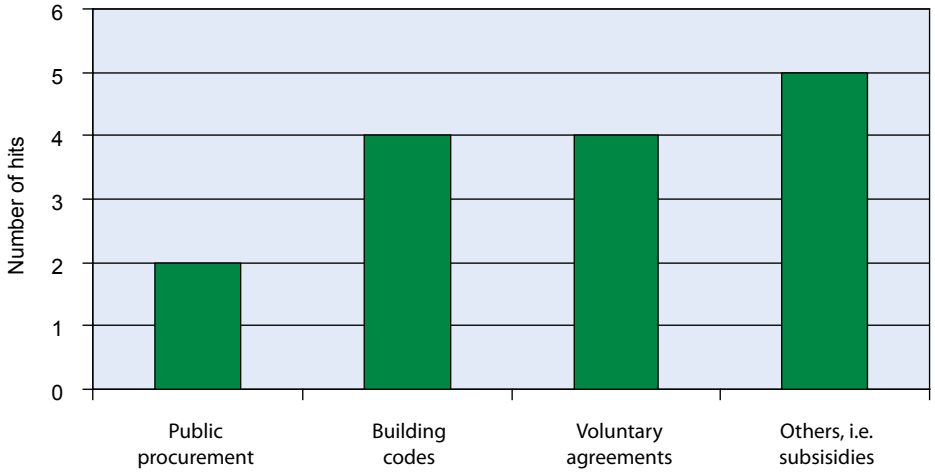
An inventory or licensing scheme for groundwater abstraction is in place or foreseen in most cases. Those schemes do not cover abstractions above 10m3/day in Belgium Scheldt, Germany Elbe and the Netherlands, as would be required by the WFD. In Belgium Scheldt, abstraction under 500m3/day must be declared to the authorities but there are indications that many illegal abstractions continue to happen. In France Rhone the respondent specifies that private abstractions (or self-service) create severe impacts on the aquifers but these abstractions are not covered by any regulatory system (see quote).

Figure 13: Inventory of groundwater abstractions



Proposed measures to reduce water use are mainly voluntary agreements, subsidies and to some extent water pricing. Subsidies for water saving technologies can have perverse effects – for example when they encourage further expansion of farming activities instead of increasing the efficiency of the farming system.

Figure 14: Tools proposed to achieve water saving



Only few measures are proposed to protect and restore quantitative groundwater status, including:

- Stricter permits and levies on the basis of water body-based allowances;
- More control to reduce illegal abstraction;
- Removal of abstraction points;
- Potential additional measures to protect Natura 2000[7] sites dependent on groundwater;
- Encourage lower abstraction from major operators;
- Set up of abstraction licensing scheme.

Proposed measures rely on better enforcement of existing regulations and sometimes encourage removal of infrastructures and co-operation of activities creating the pressure. In UK Scotland and UK South West licensing regimes were set up following the WFD.

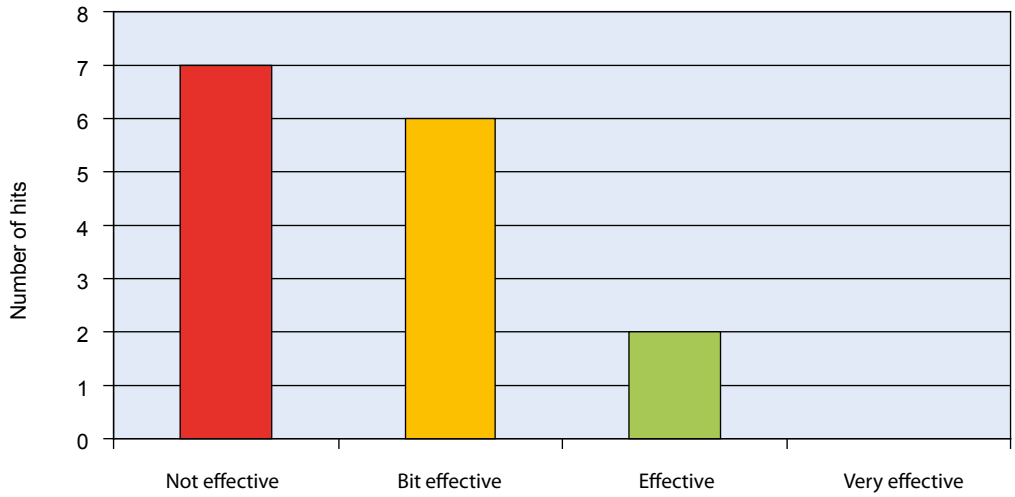
In 10 cases water saving technologies are promoted (BE-ME, BE-SC, ES-BA, ES-DU, ES-TA, NL-ME, NL-RN, UK-NU, UK-SC, UK-SW), mostly through voluntary agreements. Only in 4 cases regulation is being proposed (BE-SC, ES-BA, ES-TA, UK-SC) although for Belgium Scheldt this measure is old (see quote). In UK South West, there are suggestions to move from non-metered domestic supply to using water meters. Water saving technologies do not seem explicitly promoted in DE-RN, DE-WE, FI-KS, FR-LB, IR-SH and RO-VE.

Ecological flows are proposed in 9 cases (CZ-MO, DE-EL, ES-BA, ES-DU, FR-LB, NL-ME, NL-RN, PL-VI and UK-SC). In France Loire Bretagne, ecological flows are set but they are seen as inadequate. In the Netherlands, water quantities are allocated during drought periods and protected areas have high priorities. This is recognised by the RBMP. In UK Scotland, only a small proportion of rivers impacted by hydropower will be restored in the first RBMP. In Belgium Scheldt, research is planned to define those conditions and in protected areas specific measures are set. In the Czech Republic Morava, ecological flows are already part of legislation. In Spain Duero, ecological flows are not going to be established for all water bodies.

In 6 cases new developments likely to increase water use were identified. In Belgium Meuse, new electric power plants are constructed or planned. Some will use water for cooling. In Spain Duero and UK Scotland the RBMP acknowledges possible new infrastructures to meet the demand related to urban growth. In France Loire Bretagne, there are projects for new reservoirs for drinking water and to augment river flow.

In most cases NGOs judge the package of water saving measures as not effective.

Figure 15: Effectiveness of proposed water saving measures



[7] Natura 2000 is the EU wide network of nature protected areas under the Habitats Directive http://ec.europa.eu/environment/nature/natura2000/index_en.htm

QUOTES

Belgium Scheldt:
"There is a building code that makes rainwater tanks compulsory. There are/were some government/sector initiatives on water saving. The RBMP proposes to continue and improve these initiatives but it is not very concrete how and to what extent. [… reduction of allocated permits … compulsory water-audit for companies …] What is still missing though is a balanced financial policy and sufficient support for a transition into water-efficient technology. Flanders has pricing systems in place for extraction of groundwater and surface water; .. the proposition is to 1) expand them to smaller extractions and 2) to include environmental and resource costs (these costs have to be calculated first)."

Germany Elbe:
"Water consumption in East Germany has dramatically dropped since 1989. This was partly due to water pricing. Problem today: Water suppliers advocate more water consumption. New investments could result in an overall increase of water use for irrigation, even if efficient technology is promoted and used. An increase of water use for irrigation is highly probable according to climate changes scenarios. RBPM mentions "currently no indication for an increase of irrigation water use. It is not excluded however, due to change in climate conditions". RBMP/POM includes only very unspecific remarks regarding future management of water abstraction in lignite mining areas ("measures to reduce water abstraction in mining areas")."

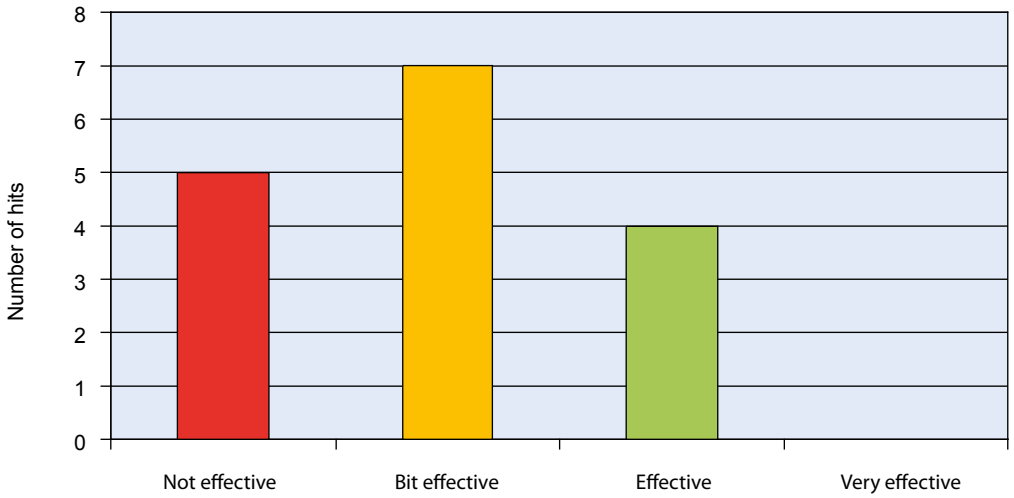
4.3 **INDICATOR 3:** MORE SPACE FOR LIVING RIVERS

WHY IS IT IMPORTANT?

Space is as important for living rivers as the amount of water they receive. Rivers can only perform their natural functions if they are given enough space, both along their banks and their courses. Over the last 200 years, most rivers in Europe have been straightened, dammed and put into concrete channels, in order to appropriate space for human use. Every day, more land is sealed for urbanisation and transport, and is no longer available to regulate river flows. Such rivers have lost their ability to provide natural services: to sustain a diversity of fish and plants, and provide clean water for people.

Creating more space for rivers is a new element of Europe's water policies and seems to start taking off. In the majority of cases measures are discussed or already in place to reduce the pressure on floodplains. Many of these measures are land use planning tools and ecological flood management measures. Most of these measures are judged to be "effective" or at least "a bit effective" by the respondents.

Figure 16: Effectiveness of proposed measures for more space for rivers



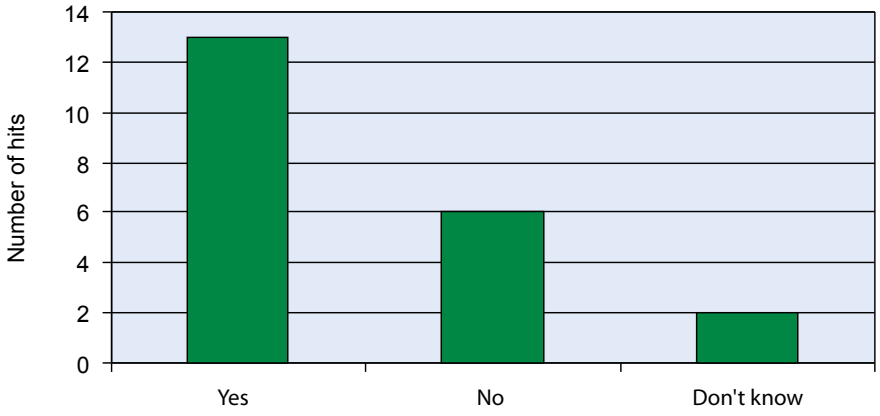
Measures to reduce developments in floodplains are in place or discussed in 12 cases (out of 23). Measures are not discussed in 8 cases: BE-ME, DE-RN, ES-TA, FR-RH, IR-SH, PI-VI, UK-SE, UK-SW. Proposed measures to restore hydro-morphological conditions include:

- Establish codes of practice to restore continuity for fish migration;
- Wetland restoration;
- Better coordination and regulation of dredging;
- Infiltration of urban runoff.

Many respondents criticise the generality and unspecific nature of proposed measures. The Czech Republic Morava is criticised for the lack of ambition in the number of proposed restoration projects. In many cases no budget and funding estimations are provided (e.g. Belgium Meuse, Germany Weser). In other cases, "space for river" concept is present (e.g. Germany Rhine and France Loire Bretagne) and a general budget is rarely provided, except for Germany Rhine – 80 mln Euro annually and France Loire Bretagne – 800 mln Euro.

Ecological flood management measures, for example using urban planning regulations, Sustainable Urban Drainage Systems (SUDS) or natural processes to slow and store water run off, are proposed and mentioned in 13 draft RBMPs. In the Netherlands, specific measures are particularly set in another policy ("space for water"). Sustainable flood management measures are not mentioned in 6 case-studies (CZ-MO, DE-WE, ES-TA, FI-KS, IR-SH, PL-VI).

Figure 17: Promotion of ecological flood management measures

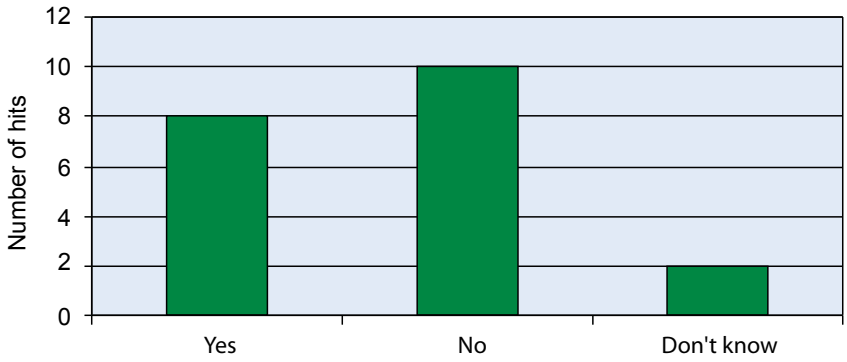


In at least 8 cases respondents identified developments which would reduce the space for rivers (ES-BA, ES-DU, ES-TA, FI-KS, FR-LB, FR-RH, UK-SC, UK-SW). In France Rhone, several projects are being developed: 1) construction of free parking in the proximity of the river, 2) urbanisation and pluvial water reservoirs in flooding areas. These reservoirs are embanked against flooding and constrain the river, while no measures to compensate the loss of land are proposed. In UK Scotland, the RBMP acknowledges the potential development of small hydropower.

Some note however that developments are well regulated and limited to general interest (e.g. France Loire Bretagne) or efforts to remove concrete obstructions and dykes and building them more inland are proposed (e.g. Netherlands Meuse).

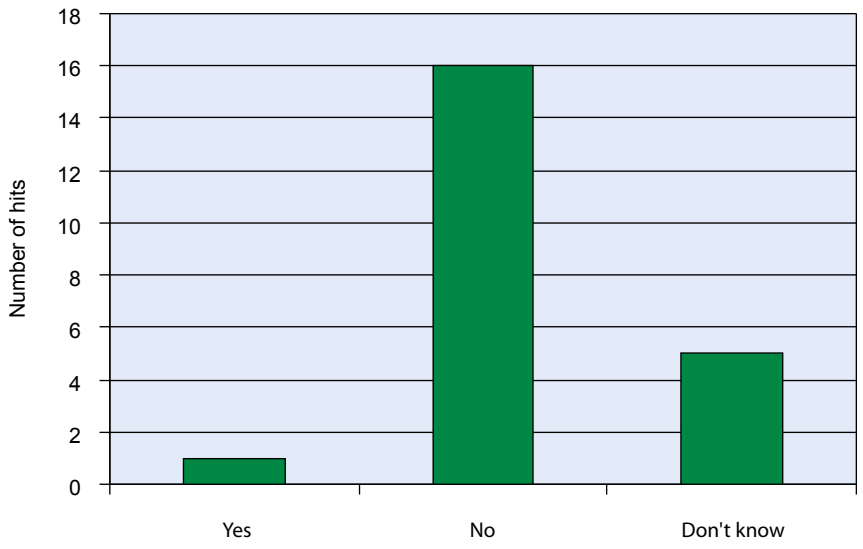
Overall these findings illustrate a gap between rhetoric and practice and that existing land use planning tools are not always sufficient or strong enough to prevent the deterioration of the status of water bodies.

Figure 18: Identification of developments reducing space for living rivers



Surprisingly only in one case an inventory of obsolete infrastructure has been made available (UK Scotland). This is a sensible and cheap first step to create more space for rivers. However, even in this case it is only a partial inventory. In Finland Kymijoki Suomen, some limited investigation is currently ongoing. In UK England and Wales, some inventories are reported to exist but do not appear in draft RBMPs.

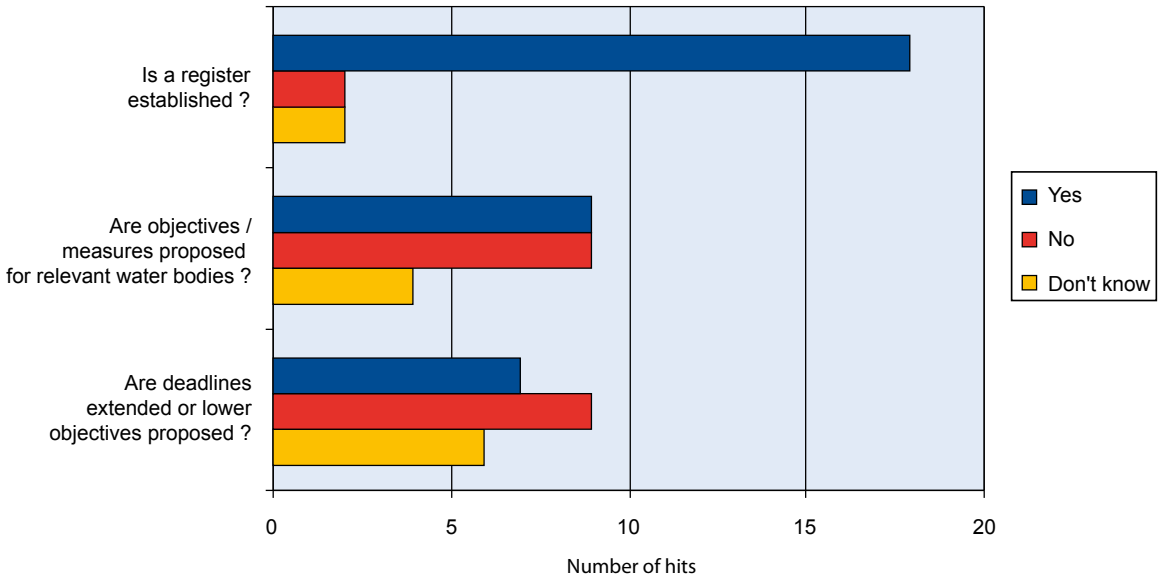
Figure 19: Inventory of obsolete infrastructure



An inventory of protected wetlands has been done in 18 cases, but only in 9 cases a broader inventory of floodplains and wetlands has been established, including non-protected areas, leaving the majority without a proper inventory. In addition many respondents report that the register is incomplete (e.g. DE-WE, ES-DU, FI-KS, FR-LB). In no case restoration targets for wetlands have been proposed.

A register of protected area has been established in the majority of cases. In 9 cases objectives or measures have been proposed to protect or restore the water body relevant for the protected area, but in 7 cases already exemptions for the Good Status have been applied (BE-SC, DE-EL, DE-WE, ES-TA, NL-ME, NL-RN, UK-SC). Belgium Scheldt specifies that objectives are not yet prepared for the drinking water area and that work is continuing to define those for Natura 2000. Germany Weser notes that measures are minimal and not ambitious enough.

Figure 20: Protected areas



QUOTES

France Loire Bretagne:
"Compensation is required for any destroyed wetland, at the double level of the destroyed surface."

UK Scotland:
"There is a small WFD restoration budget which aims to encourage small scale partnership restoration projects that contribute to WFD objectives. This budget is likely to increase and will remain active for foreseeable future. Scottish Government has also consulted on further measures that would give SEPA powers to undertake restoration of abundant structures."

Netherlands Meuse:
"Ban on new impediments, restrictions for infrastructure and buildings and rules for compensation."

Czech Republic Morava:
"The concept "space for living rivers" is not mentioned in the draft RBMP. There is no attempt to make it alive. Rivers´ floodplains and wetlands restoration is not counted as flood/drought preventive measure...they just recognise "controlled" inundation in polders. Non-engineering flood management measures are not recognised as important. There is a chapter praising policy of the last century and their clever response - river regulation and levee system building."

Germany Weser:
"Almost no single concrete measure more than already existing ones. A large number of HMWB and AWB have been wrongly identified, thus there is very little effort for restoration. There are only few, piecemeal chosen sites."

UK Scotland:
"One of the stated aims of the RBMP in Scotland is the support of hydropower generation."

4.4 INDICATOR 4: HEALTHY, SAFE WATER FOR PEOPLE AND NATURE

WHY IS IT IMPORTANT?

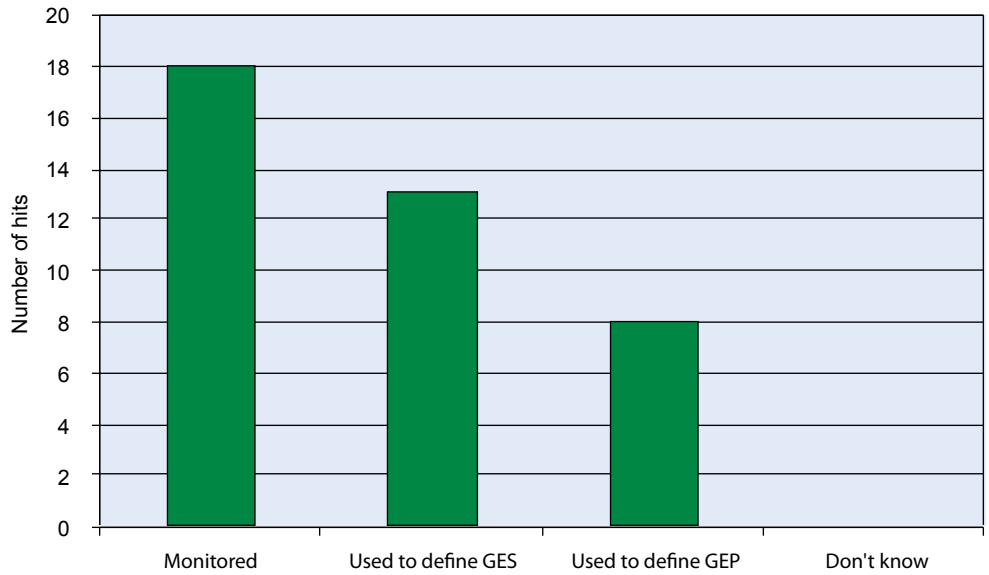
Water is the final recipient and carrier of all the chemicals and pollutants we release, knowingly and unknowingly, while producing and consuming goods and services, or simply moving around. Some of those substances can be broken down in the aquatic environment; others stay there for many decades, ultimately ending up in the world's oceans, and in our food.

EU water pollution policies are over 30 years old. With the WFD the scope of water management has been widened dramatically. Therefore our survey did not go into many details on chemical pollution control policies, for example emerging water pollutants. With regards to well known pollutants, like pesticides and nutrients, responses confirm that further measures are proposed and in the majority of cases they are judged to be effective or at least a bit effective in theory but too narrow to tackle the pollution problems at the scale of river basins.

Another major problem lies with the objective–setting. The new ecological status classification elements introduced by the WFD, like biological parameters, are not yet sufficiently established to check the validity of many general and specific chemical standards. The available information is patchy.

In 18 cases fish is now monitored although only used in 13 cases to actually define Good Status. A healthy and site specific fish population presents a robust and holistic indicator for good water status.

Figure 21: Fish parameters



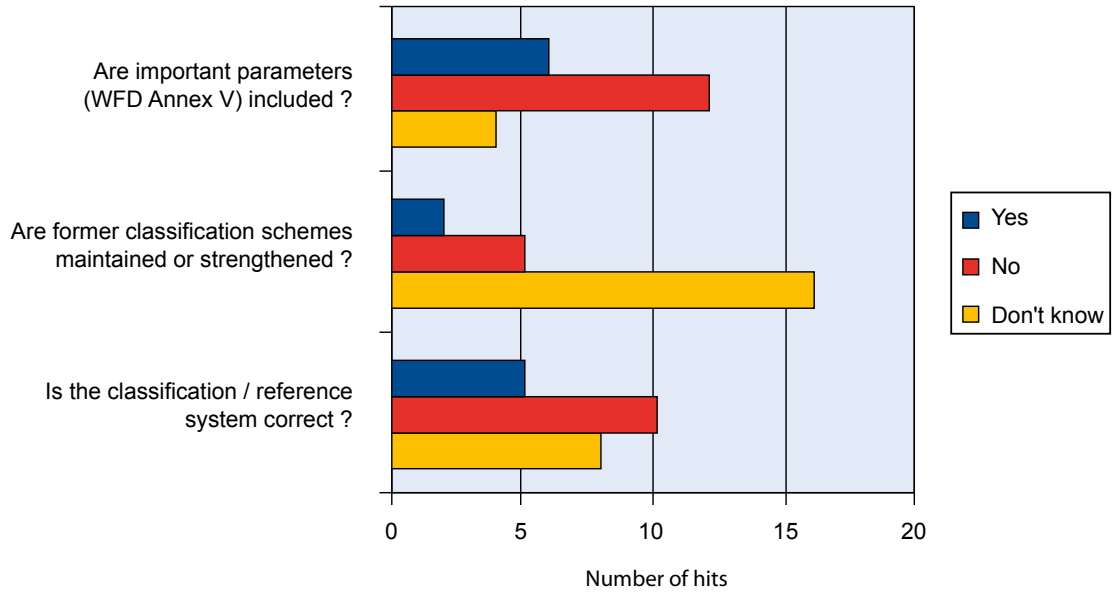
The robustness of ecological status classification is difficult to assess, but there are clear indications that in a number of cases there are concerns about whether the classification is correct due to problems with the selection of reference and number of monitoring sites, high thresholds for pollutants or procedural faults. AT, BE-SC, FR-LB, UK-SE and UK-SW seem to do best.

Often monitoring is limited (e.g. up to 20% missing data in Germany Rhine), or very recent and not included in the characterisation report yet (e.g. France Loire Bretagne) or fish are not monitored at all in some water bodies (e.g. coastal waters in Finland Kymijoki Suomen). Thus some assessments are done qualitatively (e.g. UK South West). In Scotland it is proposed to not monitor fish until the second cycle of RBMPs.

One way of checking whether the new ecological status classification is providing progress would be to compare the results of the old with the new water status classification schemes, but in most cases respondents were unable to answer this question (except for 7 cases). Only the respondents from the Netherlands confirmed that the existing classification has been weakened by the new one from the WFD.

Incorrect ecological classification has been identified in 10 cases (DE-WE, ES-BA ES-DU, FI-KS, FR-LB, UK-NU, UK-NW, UK-SC, UK-SE, UK-SW). Issues range from insufficient number of monitoring sites (Finland Kymijoki Suomen, France Loire Bretagne) or high threshold for pollutants (France Loire Bretagne). As Belgium Meuse notes, scientifically the authorities seem to perform adequately: time constraints are important and thus they are not ready for consultation which makes it less transparent. However Germany Rhine notes that some procedures and site selection are contentious.

Figure 22: Ecological Status classification



Groundwater relevant pollution has been identified in most cases: mainly nutrients, pesticides and heavy metals from agricultural sources. Some specific pollutants are planned to be banned or restricted in Belgium Meuse and the Netherlands. In Belgium Meuse, every substance on Annex I of Directive 91/414/CEE (Pesticide Authorisation) will be banned.

Proposed measures to restore the quality of groundwater status include:

- Revision of licenses of activities impacting groundwater;
- Central and continuous inventory of pollution accidents and vulnerable zones;
- Increased enforcement of nitrate legislation;
- More cross-compliance checks under the Common Agriculture Policy;
- Preventive zones around abstraction points;
- Specific pesticide bans and new rules of pesticide use;
- Potential removal of harmful industries;
- Cleaning of contaminated soils;
- No soil/rock removal or road construction close to groundwater areas;
- Groundwater protection plans to be prepared by local authorities;
- Storm water treatment.

Cleaning up costs are planned to be recovered by the polluter in Netherlands Meuse and Rhine and UK Scotland. Targeted polluters include dredging users. UK Scotland intends to focus mainly on polluting industries and not on agriculture.

Proposed measures to restore the quality of surface waters include:

- Waste water treatment development;
- Strengthening industrial licensing schemes;
- Reduction of nutrients and pesticides from agriculture through best environmental practices for farmers and buffer zone extension along rivers and ditches. Alternatively, through pesticide use control and nitrate legislation or increased use of agri-environment measures, or farming land use change to a lesser extent;
- Urban planning and stormwater treatment;
- Self service wastewater treatment for scattered settlements;
- Pollution accident management;
- Fish management plans at river basin scale;
- No more cattle access to rivers in sensitive areas.

Generally measures are mainly the enforcement of existing older EU legislation, in particular nitrate legislation, and establishing priority zones for action. There is a growing use of voluntary and incentive mechanisms such as education and information (e.g. Germany Weser). Finland Kymijoki Suomen and the Netherlands seem to be the most precise and with slightly more far-reaching measures, e.g. proposing to stop specific harmful activities or to promote soil decontamination.

While Germany Rhine is allocating a budget to the authorities in charge of reducing agriculture pollution (but no budget for other measures), Belgium Meuse and the Netherlands note draft RBMPs are not accompanied by a budget. Nevertheless the budget will be critical as restoration is mostly dependent on the broadest scale and scope of action rather than localised, isolated, poorly funded activities.

QUOTES

Netherland Rhine:
"Creation of 295 ha marshes with reed and rushes, grass like plant, for the refining (or abating) of nutrients; 849 ha of buffer strips along agricultural lands (no spraying and no manure zones)."

Belgium Meuse:
"The majority of the measures aim at chemical status restoration, including waste water treatment priorities, strengthening industrial licensing, more control and auto-control of industrial discharges, best environmental practice for farmers, buffer zones, sediments quality checking and treatment, fish management plans at the catchment scale, prevent cattle access to rivers in sensitive areas (bathing water, Natura 2000), limit domestic pesticides use, promote alternative techniques to pesticide use etc. But no budget indication provided."

Germany Elbe:
"Goals for Nitrate- and Phosphorus-reduction are 24% in order to reach good status for coastal waters. For 2015, reduction goals are 4,4% for N (4.000t/year) and 6,5% for P (240t/year). Possible measures are mentioned, but remain rather imprecise: Restrictions within agri-environmental schemes, restoration of wetlands, creation of buffer strips along water courses to reduce nutrient input. (Best case: Thuringia and Saxony provide maps with agricultural areas that are most prone to causing diffuse pollution and therefore qualify for agri-environmental measures.). No information on budgets."

UK South West:
"The unwillingness to tackle agricultural pollution is a major block to progress in the mainly rural South West of England."

4.5 INDICATOR 5: VISIONARY AND ADAPTIVE WATER MANAGEMENT

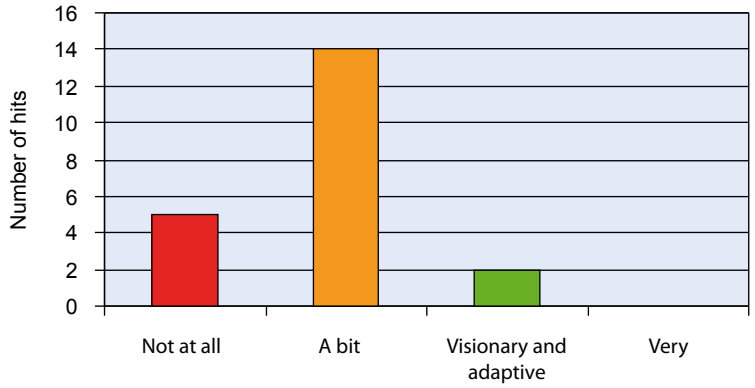
WHY IS IT IMPORTANT?

Ensuring transparency and ownership for the new water management measures and objectives in Europe; providing more water and space for rivers; and reducing pollution will require a strong vision. This needs political will, sufficient financial budgets, and a readiness to adapt and learn from past mistakes. For the first time in Europe, water management will be carried out systematically at the level of the river basins, some of which cover thousands of square kilometres and host millions of people. To be effective, water management must originate at the highest level, and be closely integrated with industrial, agricultural, transport and energy development policies. Water management has defined how civilisations have developed in the past and will continue to do so in the future.

Overall respondents do not believe that the draft RBMPs are visionary or adaptive. They note several problems including:

- missing or incoherent appraisal and costing of measures;
- narrow application of the definition of water services, which would mean that the costs of protecting and restoring water bodies rests mainly with households and the tax payer instead of the sectors responsible for the ecological degradation, like energy, transport and agriculture;
- incomplete or weak environmental objective–setting while extensive use of exemptions.

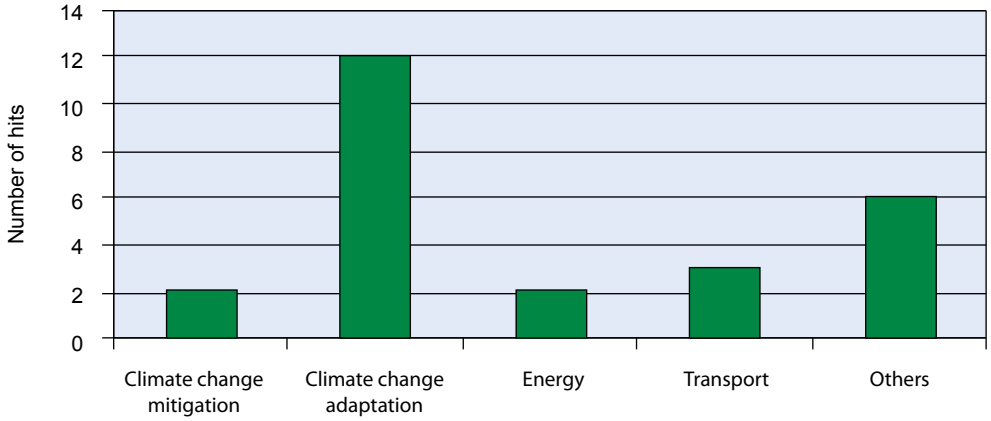
Figure 23: Visionary and adaptive character of the draft RBMP



Legal correct application of the WFD is a big issue. In 12 cases respondents note that the draft RBMP or WFD implementing national laws may not be in line with legal requirements or spirit of the WFD or implementing national laws. Often this arises from a lack of clear justification in the draft RBMPs (e.g. economic analysis) or conflicts between policy objectives (e.g. energy). Links with other water policies (coastal, groundwater, nitrate, drinking water, wastewater), energy policies (e.g. hydropower, cooling water), climate proofing for floods, agricultural policies (e.g. promoting energy crops) or urbanisation and infrastructure development (e.g. transport, navigation) are not explored in detail. Unresolved conflicts are only highlighted and clear strategies are not proposed.

Integration with other policies is weak and only clearly visible for adaptation to climate change, which is mentioned in 11 cases (BE-SC, DE-EL, ES-DU, FI-KS, NL, UK). Where it is mentioned, the issues addressed include rising water temperature or increased flood risks. Climate change mitigation is only mentioned in UK Northumbria and UK South West. In UK Scotland energy is mentioned in a note that supports more hydropower. In the Netherlands a strategic environmental assessment accompanies the draft RBMP, investigating the impact of climate change.

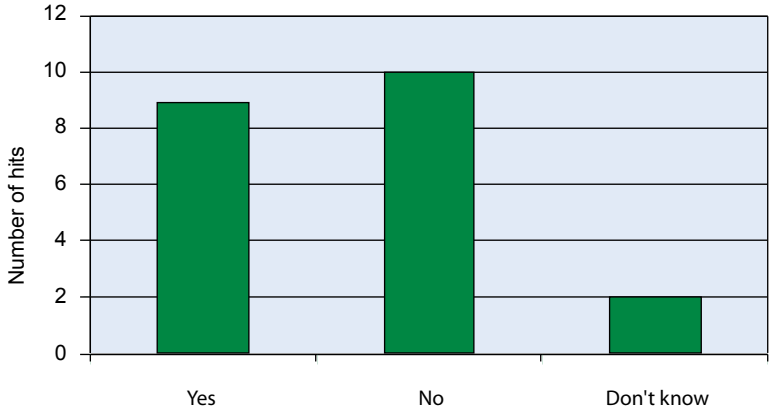
Figure 24: Input to and integration with other policies



Chapters on Climate Change are provided in 14 cases (BE-SC, CZ-MO, DE-EL, ES-BA, ES-DU, ES-TA, FI-KS, NL-ME, NL-RN, UK-NU, UK-NW, UK-SC, UK-SE and UK-SW). Most common the subject is only touched on the surface and does not affect the selection of measures at this stage. In Belgium Scheldt for example the respondent notes that proposed measures are clearly not sufficient to address climate change impacts. In other cases, climate change is used to promote more engineering measures (e.g. Czech Republic Morava). In Finland Kymijoki Suomen, the draft RBMP specifies that climate change will only be considered generally in this round of RBMP. However, measures have still gone through a screening process to check whether they promote adaptation. Climate change has not been explicitly taken into account in 7 cases (BE-ME, DE-RN, DE-WE, FR-LB, IR-SH, PL-VI, RO-VE).

Coordination with the new EU Flood Directive is weak. Only in 9 cases a chapter on co-ordination (BE-ME, CZ-MO, DE-EL, ES-BA, ES-TA, FI-KS, NL-ME, NL-RN, UK-SC) has been included. Generally, the development of the other policy framework is mentioned and potential to coordinate them is highlighted. There are striking differences of treatment: in UK Scotland it is proposed to integrate flood risk management and WFD through natural flood management, while in Czech Republic Morava the authorities are pushing for more flood protection infrastructures and thus watering down WFD objectives.

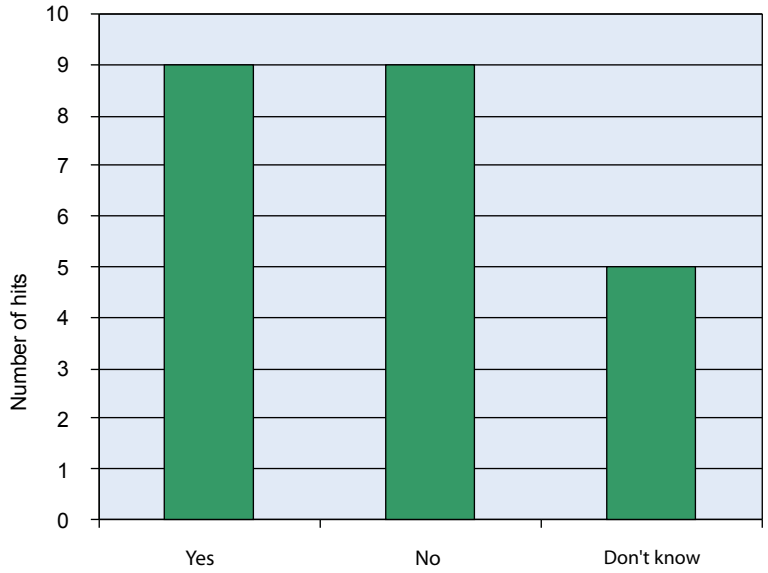
Figure 25: Does the draft RBMP include a chapter on coordination with the flood directive?



There are reported conflicts with other policies in 14 cases. Most conflicts arise from a clash with energy policies (e.g. hydropower, cooling water), climate proofing for floods, agricultural policies (e.g. promoting energy crops) or urbanisation and infrastructure development (e.g. transport). Germany Weser highlights conflicts with promotion of navigation. In Spain Duero and UK Scotland meeting growing water demands is a priority and is likely to lead to more abstraction. Interestingly, Belgium Scheldt reports that there is no conflict because there has been a strong emphasis on the overarching aim towards sustainable development and WFD objectives are seen as central to achieving this (e.g. to reach them at the latest in 2021).

Establishing an overriding public interest is a conditionality to justify further deterioration of the aquatic environment. 9 draft RBMPs are proposing an overriding public interest for specific sector developments (CZ-MO, DE-RN, DE-WE, ES-DU, ES-TA, PL-VI, UK-NU, UK-SC and UK-SW). Sectors include energy, tourism, industry, irrigation and drinking water supply, navigation and agriculture. Reasons provided include employment, security of water supply and rural development, power supply or renewable energy policies.

Figure 26: Establishment of an overriding public interest for certain sectors



QUOTES

Netherlands Meuse:
"Many measures are to be combined with other policies, e.g. the control of flooding and making robust water systems for nature areas."

Ireland Shannon:
"All it says it that there must be coordination with the Flood Risk Management Plans but no details about rationale or how this will be done."

Czech Republic Morava:
"The authorities try to promote old fashioned infrastructure and they count on excuses in the name of overriding public interest (protection of property). When it comes to discuss inundation and space for rivers, they say - it is too difficult to deal with landowners. When it is about to push a large dam, they are very quick to buy all the necessary plots of land."

France Loire Bretagne:
"On the one hand, agri-environment measures to be used for WFD objectives, e.g. change from arable to pastures and lower grazing intensity. On the other a five-year extension has been given to farmers for the implementation of specific phosphorus application regulation while the law specifies it should be immediate."

UK Scotland:
"We do not believe that the objectives for Protected Areas meet legal requirements. Also, timescale and objective derogations have not been justified and there is no disproportionate cost assessment or cost-effectiveness analysis of measures available."

Finland Kymijoki Suomen:
"In this first round, climate change will be treated on general level. The aim is that measures promote also adaptation to climate change. All the measures have been screened regarding climate change."

5 CONCLUSIONS AND RECOMMENDATIONS

The WFD has set in motion a unique water management reform process. Across the EU, governments are engaging in one of the biggest, most coordinated consultation exercises ever on plans to restore the ecology of our river basins by 2015.

Our survey-based assessment has confirmed that a mobilisation for reform has taken place in most river basins. At the same time significant parts of Europe are seriously lagging behind at government and civil society levels. The governments, which are on track with the consultation, have serious problems in managing the open, integrated and politically demanding approach set out by the WFD. The main findings are summarised as follows:

- **Significant efforts are being made to improve consultations but they are not yet achieving active involvement of civil society**. Information is often not coherent or comprehensive for that purpose. Authorities find it difficult to recognise the importance of non-expert judgments and are reluctant to accept changes to their plans.
- **Reducing water use has not yet been mainstreamed into water management plans.** This omission weakens the relevance of water policy in determining or playing a role in shaping climate and energy policies and in delivering sustainable development strategies.
- **Providing more space for rivers is an emerging new water management issue.** The experience and capacities gained from habitat and nature protection is enabling this positive development. Nevertheless, the transfer of local measures to the river basin scale remains a challenge. Data are insufficient to assess to what extent up-scaling is taking place. Many obstacles have been identified, including transport, energy and agricultural developments, especially in countries with relatively natural space for rivers still left, for example in Eastern and South-Eastern Europe.
- **Traditional pollution control and chemical quality standard setting is continuing but unlikely to be sufficient.** Although pollution levels of some well known substances, such as nutrients and pesticides, have been stabilized as a result of older water policies, it is unlikely that the draft plans will now take the next step and bring them down to acceptable levels. Eecological based classification, which would assess the impact of chemical cocktails and subtle effects like hormone interference, is still rather immature. Cost-effective pollution controls, including phasing out hazardous substances at product level, is not part of basin planning to a large extent.
- **Utilising river basin planning to develop long-term visions is not yet happening.** Political leadership is missing to grasp the opportunity arising from developing long-term river basin plans, to increase regional cooperation, to respond to climate change and ecosystem collapse and to provide lasting solutions to the economic crisis.

WHAT NEEDS TO HAPPEN: BUILD ON ACHIEVEMENTS AND FILL THE GAPS

This study identifies a number of areas for improvements in consultation processes and the draft River Basin Management Plans, which are urgently needed if the EU is to meet its objective of sustainable water management. This is not only a task for water authorities, but also requiring national and regional governments, the European Commission, Parliaments and NGOs to step up their activities.

Governments and water management authorities should:

- Use the six months left to improve the RBMPs, in order to provide relevant information and increase public involvement:
  - > Make clear proposals for environmental objectives, including how many water bodies are to be restored to Good Status, how many water bodies will have their deadlines for achieving Good Status extended or objectives lowered and the justification for these exemptions. In case of a lack of data, strategies to close the data gaps have to be presented, while at the same time authorities should work with and present proxies for basin-level restoration objectives, such as restoration of individual elements, reconnection of floodplains and water saving objectives;
  - > Allow full scrutiny of proposed environmental objectives and measures and ensure appropriate feedback to public comments are provided during the consultation.
- Give the reduction of water use a boost by:
  - > Proposing ambitious water saving objectives and promoting water saving technologies and consumption patterns;
  - > Developing a fair and legally correct water pricing policy which ensures that major water users, like energy, transport and agriculture are adequately contributing to the financial and environmental / resource costs of the water services they receive.
- Provide rivers that still have space and maintain natural characteristics, with proper protection from developments in the field of energy, transport and agriculture. Where plans start discussing how to provide space for rivers, this needs to be substantiated by clear restoration targets and budgets.
- Increase efforts to bring down the concentrations of well-known pollutants like nutrients and pesticides and face up to the challenge of addressing upstream pollution through product controls.
- Design RBMPs in a way to make them relevant as regional planning instruments for energy, transport and urbanisation, specifically through widening and improving the assessment of environmentally better alternatives. Make the plans a central part of strategies to mitigate and adapt to climate change and reverse the loss of biodiversity.

The European Commission should:

- Take swift and effective steps against the violation of legal requirements, focussing on
  - > inconsistent water service definition and incomplete economic assessment of water uses;
  - > late consultation and missing reports;
  - > lack of information relevant to carry out consultation on environmental objectives.

European and National Parliaments should:

- Use their powers to demand governments improve the draft RBMPs to bring them in line with legal requirements of the WFD and help make them high level policy instruments to address the big challenges.

Environmental NGOs should:

- Step up their activities in the field of water protection to help achieve making real and lasting changes for a better protection of this critical resource.
- Continue to engage, prioritise and communicate effectively on the importance of protecting crucial water resources to help societies become more resilient to environmental change.

ANNEX 1
PARTICIPANTS

AUSTRIA **Cornelia Mayer** Umweltdachverband cornelia.maier@umweltdachverband.at +43 1 401 13 23	BELGIUM MEUSE **Marie Cors** Inter-Environnement Wallonie m.cors@iewonline.be +32 81 255 291
BELGIUM SCHELDT **Wim van Gils** Bond Beter Leefmilieu wim.van.gils@bblv.be +32 2 28 21 733	CZECH REPUBLIC MORAVA **Zdenek Postulka** Hnutí DUHA FoE ČR (member of the Green circle ČR), Union for Morava river zdenek.postulka@hnutiduha.cz +420732957552
GERMANY ELBE **Michael Bender, Tobias Schäfer (GRÜNE LIGA) and Christian Schweer (BUND)** wasser@grueneliga.de +49-30 44 33 91 -44	GERMANY RHINE **Dr. Christoph Aschemeier** Wassernetz NRW ca@wassernetz-nrw.de +49 211/302005-27
GERMANY WESER **Moritz Busse** Wassernetz Niedersachsen/Bremen, c/o Bund für Umwelt- und Naturschutz Deutschland e.V., Landesverband Niedersachsen wassernetz@nds.bund.net +49 511 9656932	DENMARK **Henning Mørk Jørgensen** Danmarks Naturfredningsforening / Danish Society For Nature Conservation hmj@dn.dk +45 39 17 40 18
FINLAND KYMIJOKI SUOMENLAHTI **Hannele Ahponen** Finnish Association for Nature Conservation hannele.ahponen@sll.fi +358 9 228 08 235	FRANCE LOIRE BRETAGNE **Raphaël Chaussis** France Nature Environnement (FNE) eau@fne.asso.fr +33 2 38 62 55 90
FRANCE ORNE **Horn Michel** Rivières et Bocages de Basse-Normandie horn.michel@wanadoo.fr +33 2 31 75 21 46	FRANCE RHONE **REYNIER** Association d'environnement « Collectif Mosson –Coulazou » breynier@tele2.fr +33 4 67 40 23 59
GREECE **Evangelos Terzis** WWF Greece e.terzis@wwf.gr Tel: +30 210 3314893	HUNGARY **Laurice Ereifej** WWF Magyarország/ WWF Hungary laurice.ereifej@wwf.hu + 36 (1) 214-5554
ITALY **Andrea Agapito Ludovici and Nicoletta Toniutti** WWF Italia n.toniutti@wwf.it +39 329 1921090	IRELAND SHANNON **Sinead O'Brien** Sustainable Water Network (SWAN) sobrien@swanireland.ie +353 1 6425583

THE NETHERLANDS MAAS AND RHINE DELTA **Ben Hermans** Stichting Natuur en Milieu B.Hermans@Natuurenmilieu.nl +31 30 2348251	POLAND VISTULA **Anna Smolka** Polish Ecological Club Gliwice Chapter biuro@pkegliwice.pl +48 32 2318591
PORTUGAL **Paula Chainho** Liga Para a Proteccao Da Natureza pmchainho@fc.ul.pt + 351 21 778 00 97	ROMANIA ARGES VEDEA **Ionescu Camelia** WWF Danube - Carpatian Programme cionescu@wwfdcp.ro +40 21 3174996
SPAIN BALEARES **Graciela Ferrer (1) & Miquel Camps (2)** (1) Foundation for a New Water Culture & (2) GOB Menorca (local NGO) graciela.ferrer@uv.es mcamps@gobmenorca.com (1) +34 616309243 ; (2) +34 971350762	SPAIN JUCAR **Mª del Carmen Cerdá, Paco Sanz** Ecologistas en Accion Carmelaenguera@yahoo.es +34 687528764
SPAIN DUERO **Alberto Fernández Lop** WWF España aguascont@wwf.es +34 91 354 05 78	SPAIN EL TAJO **Alexander Waldkircher and Santiago Martín Barajas** Ecologistas en Accion accesouniversalalagua@yahoo.de +34 646 530 214
SLOVENIA **Martina Zupa** Global Water Partnership Slovenia martina.zupan@siol.net +386 1 427 32 45	UNITED KINGDOM ANGLIAN **John Sharpe** RSPB john.sharpe@rspb.org.uk +44 1603 697508
UNITED KINGDOM ENGLAND AND WALES **Ralph Underhill** RSPB Ralph.Underhill@rspb.org.uk	UNITED KINGDOM NORTHUMBRIA **Andy Bunten** RSPB andy.bunten@rspb.org.uk +44 191 233 4308
UNITED KINGDOM NORTH WEST **Frances MacGuire** RSPB frances.macguire@rspb.org.uk +44 1422 845322	UNITED KINGDOM SCOTLAND **Andrea Johnstonova** RSPB Scotland/Scottish Environment LINK Andrea.Johnstonova@rspb.org.uk +44 131 311 6500
UNITED KINGDOM SEVERN **Simon Barker** The National Trust simon.barker@nationaltrust.org.uk +44 1743 708148	UNITED KINGDOM SOUTH WEST **Roger Furniss** South West Rivers Association/Angling Trust email@furniss2733.fsnet.co.uk +44 1392 841235

ANNEX 2
SURVEY METHODOLOGY

This report is based on the responses to a set of question given by NGO representatives active in the developing the RBMPs. Responses have been checked for consistency and verified using available documents or in correspondence with the respondents. The result of this survey is a "snapshot". It gives a picture of the WFD implementation at a given time as seen through the eyes of the individual people and organisations.

A first questionnaire (see http://assets.panda.org/downloads/eeb_wwf_questionnaire_on_rbmps_final.pdf) was designed in November-December 2008, and tested using the draft RBMPs in the UK, Germany and France. The final questionnaire was distributed to the EEB and WWF water network in January 2009, and answers collected in February - March 2009.

In total, we received 32 responses from 28 NGOs for 32 different River Basin Districts or countries (see Annex 1: Participants). In 10 cases consultations had not started and in 3 of those cases, Austria, Spain Duero and El Tajo River Basin Districts, respondents could provide answers based on alternative information sources. 20 respondents successfully responded to the questionnaire based on draft RBMPs. Thus we could use in total 23 responses for this assessment.

DATA QUALITY AND BIAS

The survey covers all European regions, but with a bias for North-West Europe. 21 respondents are from North-West Europe (Austria, Belgium, Finland, France, Germany, Netherlands, UK), 7 from Southern countries (Italy, Greece, Portugal, Spain, Slovenia), and 4 from Eastern countries (Czech Republic, Hungary, Poland, Romania).

Due to limited responses from central and Eastern Europe, the survey is mostly representative for the situation in Western Europe. Mediterranean countries have mostly not started consultation on the RBMPs in time, except for the Balearic River Basin District, which means that no proper assessment for those countries was possible.

The heterogeneity of the consultation timing can have an impact on the information available. However the questionnaire was designed to account for this and qualitative data was collected to gather information about the general experience of the participant of the public participation process in his/her country/river basin.

Evaluating the quality of public participation processes is a difficult task in an international context, due to cultural bias in designing the questionnaire and answering and multiple factors affecting public participation: institutional set up, historical context, cultural values, etc.

Public participation cannot be judged by formal process alone (e.g. tools and methods used to involve the public), but also how the opinion of stakeholders is taken into account in the decision-making. The design of the questionnaire tried to account for these difficulties: a set of quantitative questions was developed to provide baseline or contextual information, supported by several qualitative questions when cultural factors thought of being an important factor in the evaluation. Such approach unfortunately leaves an important degree of freedom to the respondent, and his/her personal perception/experience influences the analysis.

ANNEX 3

"RIVER PREMIER LEAGUE" METHODOLOGY

For each headline indicator we selected in consultation with the survey participants a combination of relevant questions to judge the specific performance. The difficulty is to reflect in the overall assessment that each case-study has specific strengths and weaknesses. To take this into consideration the methodology uses a minimum and maximum point system where positive and negative results are first accounted separately, but then assembled at the classification stage. All answers were digitised. Minimum and maximum points for each answer are then normalised and weighed separately to reflect their importance in the overall assessment.

The questionnaire can be found at
http://assets.panda.org/downloads/eeb_wwf_questionnaire_on_rbmps_final.pdf

1. Transparent and publicly owned water management

- *Q 2.1: Has RBMP consultation started in time?*
- *Q 2.2.2: Is information available on the status, measures, objectives and their justification for bodies of water accessible?*
- *Q 2.2.3: Has an appraisal of measures been undertaken in a transparent way?*
- *Q 2.3.1: Will the consultation process create new ownership in the RBMPs:*
- *Q 2.3.5: Have you tried to influence the designation of HMWBs? With success?*
- *Q 2.3.9: Are you satisfied with the consultation?*
- *Q 3.1.2 / 3.1.3 / 3.1.4 / 3.2.2 / 3.2.3 / 3.2.4: Are data on objectives and reasoned exemptions provided?*

2. Reducing wastage and using water well

- *Q 3.1.7: Are measures taken to restore quantitative status of groundwater and how do you rate their effectiveness?*
- *Q 5.1: Are water saving objective discussed or proposed?*
- *Q 5.2.: Are water saving technologies promoted?*
- *Q 5.3: Are water saving measures effective?*
- *Q 5.4: Are ecological minimum flows established?*

3. More space for living rivers

- *Q 3.2.1: Are measures in place to reduce hydro-morphology pressures and how effective are they?*
- *Q 6.1 / 6.2 and 6.3: Has a wetland/floodplain inventory been made, restoration targets and non-engineering flood management measures been proposed?*
- *Q 6.4: How do you rate the effectiveness of those measures?*

4. Healthy, safe water for people and nature

- *Q 3.1.7: Are measures to reduce groundwater pollution effective?*
- *Q 3.2.6: Is the ecological classification complete and correct?*
- *Q 3.2.7: Are pollution control measures established and how effective are they?*

5. Visionary and adaptive water policies

- *Q 7.1: Are aspects of the draft RBMPs not in line with WFD requirements?*
- *Q 7.2: Does the draft RBMP formulate input to or integrated with other policies?*
- *Q 7.3: Has climate change been taken into account in the plan?*
- *Q 7.4: Does the draft RBMP ensure coordination with the flooding risk management Directive?*
- *Q 7.6: Does the draft RBMPs establish for certain sectors or activities and overriding interest?*
- *Q 7.8: How do you rate the overall visionary and adaptive character of the RBMP?*

DIGITISATION

Answers based on "yes", "no", "don't know", the following digitisation method is used:

- *"don't know" and not answered for questions 2.1, 2.2.2, 2.2.3, 2.3.1, 2.3.9, 3.1.2 and 3.2.2 was translated into -1. This reflects the idea that if the participant cannot answer the question, then information provision to stakeholders is not adequate*
- *"don't know" and not answered in all other cases was translated into 0. This is different from transparency because the aim is not to assess quality of information provision but the quality of information itself.*
- *"no" and "yes" was translated either into -1 or 1 depending on the question*

Qualitative information was used to verify the tick box response.

Answers based on a qualitative scaling, the following digitisation method is used:

1 (not at all effective, low quality) = -1
2 (a bit effective, moderate quality) = -0.5
3 (effective, good quality) = 0.5
4 (very effective, high quality) = 1

NORMALISATION AND WEIGHING

Some questions are composed of sub-questions (e.g. Q 2.2.2 has several sub-questions). In this situation digitised answers are normalised by taking their average.

Result for each question is weighted to reflect their importance to the overall assessment.

Overall the weighing is used to ensure that half of the assessment is determined by the judgement of participants about effectiveness and quality and half by information derived from the draft RBMP.

CLASSIFICATION

Five equal intervals will be calculated based on the minimum and maximum achievable points and five categories established following the description and colours of the WFD Good Status classification:

High – Blue
Good – Green
Moderate – Yellow
Poor – Orange
Bad- Red

In case where more then 50% of the answers is "don't know" or no answers have been provided at all, the background colour is grey.

In cases where consultation did no start white background is used to mark the quality of consultation and participation.

WWF
The mission of the World Wide Fund for Nature (WWF) is to stop the degradation of the planet's natural environment and to build a future in which humans live in harmony with nature, by conserving the world's biological diversity, ensuring that the use of renewable resources is sustainable and promoting the reduction of pollution and wasteful consumption.

EEB
The European Environmental Bureau (EEB) is a federation of over 140 environmental citizens' organisations based in all EU Member States and most Accession Countries, as well as in a few neighbouring countries. These organisations range from local and national, to European and international. The aim of the EEB is to protect and improve the environment of Europe and to enable the citizens of Europe to play their part in achieving that goal. The EEB office in Brussels was established in 1974 to provide a focal point for its Members to monitor and respond to the emerging EU environmental policy. It has an information service, runs working groups of EEB members, produces position papers on topics that are, or should be, on the EU agenda, and it represents the membership in discussions with the Commission, the European Parliament and the Council. It closely coordinates EU-oriented activities with its members at national level, and also closely follows the EU enlargement process and some pan-European issues.

For further information please contact:

Pieter de Pous

European Environmental Bureau (EEB)
Boulevard de Waterloo 34 | 1000 Brussels | Belgium

Tel. +32 2 2891306

pieter.depous@eeb.org

ww.eeb.org

Sergey Moroz

WWF European Policy Office
Avenue de Tervurenlaan 168 | 1150 Brussels | Belgium

Tel. + 32 2 7400923

smoroz@wwfepo.org

www.panda.org/eu