

ECI's contribution on the Revision of the Drinking Water Directive in view of the Trilogues

The European Copper Institute (ECI) strongly supports measures that help to improve the quality of water intended for human consumption. ECI therefore is in favour of EU-wide standards that help understanding and reduce sources of chemical and /or biological contamination in drinking water systems. We see three main topics to be addressed in this context:

- **MATERIALS & PRODUCTS** to come into contact with Drinking Water: ECI supports EU-wide harmonised requirements on the hygienic safety of materials and products in contact with drinking water.
- **WATER DISTRIBUTION INFRASTRUCTURE**: ECI supports the adoption of measures that improves risk-based approaches in all technical aspects, be it water temperature, thermal disinfection, hydraulic conditions or the building and construction processes.
- **SURVEILLANCE and ANALYSIS METHODS**: ECI supports any measure to introduce analysis methods into surveillance programs of national authorities that reflect the actual state of knowledge and technology.

Against this background, we recognise a significant improvement in the EP and Council DWD resolution (1) compared to the Commission's original proposal for the following reasons:

- It applies to all materials and products in contact with water intended for human consumption, addressing both, sources for chemical as well as sources for basic biological contamination
- It sets the basis for the development of common hygienic requirements on drinking water applications that need to be harmonised. The integrity of water distribution networks and the point of use (tap) is given.

At the same time, ECI is missing significant improvement in the EP's and Council's position to adequately address the significant and increasing threat to human health given by microorganisms. Especially, ECI sees the need to clearly target *Legionella pneumophila* (*L.p.*) as the most dangerous parameter, recognising that more than 96% of harmful cases are result of (*L.p.*) and that other legionella species are not likely present without *L.p.* We therefore ask:

- to clearly focus on and regulate the parameter *Legionella pneumophila* in Annex III
- to refrain from the use of colony forming units (CFU), and keep the original term number/l³, in the microbiological parametric values, as this unfairly limits solutions available to the end user.
- to establish innovative risk based approaches to measure and control microorganisms with focus to the greatest extent on *L.p.* (2) and avoid double testing of minor organisms with unnecessary related costs. This will save precious time to detect the deadly legionella *pneumophila* and rapidly respond with remedial solutions.

References:

1. European Parliament legislative resolution of March 2019 on the proposal for a directive of the European Parliament and of the Council on the quality of water intended for human consumption (recast) <http://www.europarl.europa.eu/sides/getDoc.do?pubRef=-//EP//NONSGML+TA+P8-TA-2019+0320+0+DOC+PDF+V0//EN>. Accessed April 12, 2019
2. Flemming HC (2014) The hidden life in drinking water installations: biofilms and viable but-nonculturable bacteria of hygienic relevance. In: WHOCC Newsletter No. 23, August 2014
3. European Commission. Council Directive 98/83/EC of 3 November 1998 on the quality of water intended for human consumption. <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:31998L0083&from=EN>. Published December 5, 1998. Accessed April 12, 2019.