

Cefic views on the Water Resilience Strategy

The European Commission's initiative on the Water Resilience Strategy is a pivotal step towards tackling the complex challenges associated with water management across the European Union. The increasing frequency and severity of water-related events such as floods, drought and water scarcity across the European continent demands to take actions to adapt to these new conditions.

The chemical industry uses fresh waters for cooling, heating processes and for logistics purposes. Under strict quality conditions water can be recycled for cooling and process purposes. Our bulk chemicals are used to clean fresh water, and innovative polymers are used in membranes to sanitise drinking water.

Whilst the chemicals industry's ambition to implement the European Green Deal through the Clean Industrial Deal remains undisputed, our plea to the European Commission concerning the upcoming Water Resilience Strategy is as followed:

- Respect the fundamental Subsidiarity Principle in water management;
- Avoid overlapping requirements already addressed in existing legislative frameworks;
- Enhance competitiveness and encourage investment through ensuring access to water for human activities including industrial uses in an efficient way;
- Strengthen collaboration between all Stakeholders;
- Foster innovation by adopting a technology-neutral approach in full consideration of the energy-water nexus (consideration of cross-media effect, as stated in the Industrial Emissions Directive- art 15).

Our Asks

1. Ensure Subsidiarity in Water Strategy: Water management challenges are best addressed at the river-basin level, where authorities have a deep understanding of the specific conditions and requirements of their regions. Member States and local authorities should retain the flexibility to implement measures that align with their specific circumstances. The EU can enhance water resilience and ensure long-term sustainability through guidance.

2. Avoid Overlapping Requirements in EU Legislation: The EU has advanced and sophisticated legislation. Before introducing further measures, it is crucial to allow time for the proper implementation of newly-revised directives, such as the Industrial Emissions Directive or the Urban Wastewater Treatment Directive. Maintaining a harmonised approach to water efficiency that aligns with the existing legislative framework ensures fair competition. By adding a separate water efficiency principle, there is a risk of overlapping and potentially contradictory measures, which could undermine the coherence of existing

legislation, create further issues in the permitting process, and resulting in an lack of coherent implementation in the Member States. We foresee the resilience strategy as an opportunity to eliminate the unnecessary requirements by embracing the concept of an Integrated Water Framework.

3. Ensure Clean and Affordable Water and Sanitation for all as a Competitiveness Pre-requisite: The European Commission has prioritised competitiveness, recognising its importance for the economic vitality and global standing of Europe. The chemical industry is highly exposed to international competition. It needs predictability to stay competitive. We call for an EU- level playing field that fosters a fair cost- and data-sharing mechanism for the evaluation of substances vital to the production of drinking water contact materials such as underground pipes and kitchen taps.

Ensuring fair and affordable access to water supply and wastewater treatment networks are key strategic drivers for Europe's industry. We believe that promoting sustainable water management practices can enhance competitiveness and resilience.

While aiming for effective implementation of European environmental standards, we believe any new standardisation enforcement should be accompanied by a thorough impact assessment inclusive of the impact on cost to operate and competitiveness.

Finally, pricing for externalities should be left to the decision of national authorities and addressed at the local level under a Subsidiarity Principle.

4. Strengthen Collaboration Between All Stakeholders: Effective cross-border collaboration is essential, involving coordinated efforts among Member States to address shared challenges. Promoting joint initiatives, regular communication and supporting cross-border working groups via existing transboundary river commissions can facilitate the exchange of information and best practices. Improving existing multi-stakeholder dialogue is crucial to enhance efforts in water resilience and efficiency measures within the river basin/catchment.

Cefic supports the collaboration with industry, government partners and cities to foster water use efficiency and develop cost-effective and innovative solutions that help achieve a higher circularity of water. There are some examples of public-private partnerships that have already emerged in the form of reusing of urban wastewater as an alternative sustainable industrial water supply.

5. Technology Neutrality and the Water-Energy Nexus: The water-energy nexus is crucial due to its interplay between water availability, energy production and manufacturing processes. Efficient and sustainable solutions for water recycling and reuse require an integrated, technology-neutral approach that considers both risks and benefits.

The strategy should be coordinated with existing policies across different sectors and scales, and best-in-class modelling tools should be used to ensure alignment of water and energy policies.

Cefic is prepared to engage with the European Commission and stakeholders to share its ideas and explore potential solutions. By fostering innovation and promoting sustainable water management practices, the EU can enhance the resilience and competitiveness of its industries.

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About Cefic

Cefic, the European Chemical Industry Council, is the forum of large, medium and small chemical companies across Europe, accounting for 1.2 million jobs and 13% of world chemicals production. On behalf of its members, Cefic's experts share industry insights and trends, and offer views and input to the EU agenda. Cefic also provides members with services, like guidance and trainings on regulatory and technical matters, while also contributing to the advancement of scientific knowledge.