



June 3, 2019

Position

on the Draft of the Council of the European Union on the Revision of the EU Drinking Water Directive

Figawa supports all measures which contribute to the improvement and harmonisation of drinking water quality and the associated level of consumer protection in all EU Member States, taking into account technical feasibility and economic proportionality.

Therefore figawa supports the complete harmonisation of hygienic requirements and test methods for all materials and products in contact with drinking water at European level.

This includes in particular:

- **EU-wide positive lists of materials (organic materials, elastomers, cement, metals, etc.) suitable for use in products in contact with drinking water.**
- **General hygienic requirements for materials and products (e.g. for microbiological growth, taste, smell, colouring and turbidity of water).**
- **Uniform test methods for conformity confirmation for products made of such materials.**
- **A system for marking products in contact with drinking water according to EU regulations.**
- **A review clause obliging the Commission to evaluate progress towards harmonisation and alignment of levels of protection.**

Against this background, the European Union Council's draft for the revision of the EU Drinking Water Directive represents a considerable improvement on the Commission's original proposal and is therefore to be welcomed in principle.

Figawa calls on the EU institutions in the forthcoming trilogue negotiations to further specify the requirements for *microbiological parameters* to adequately address the increasing threat to human health posed by microorganisms. In view of the fact that more than 96% of legionellosis cases are caused by *Legionella pneumophila*, we therefore ask:

- **to include the parameter *Legionella pneumophila* in Annex III and regulate it clearly.**
- **to refrain from the use of the process-specific "colony forming units" and keep the process-open term "number/litre" in the microbiological parametric values.** Only if a clear definition is necessary should reference be made to the respective analytical method used (e.g. for the plate method "CFU", for the titre method "MPN" etc.). After prior validation against the reference value, the use of alternative analytical methods may thus be ensured. The strict definition of "colony forming units" would constitute an unacceptable obstacle to research, development and application of future innovative analytical methods.
- to establish innovative risk-based approaches for the measurement and control of microorganisms and to concentrate primarily on *Legionella pneumophila*.

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figawa - Bundesvereinigung der Firmen im Gas- und Wasserfach e.V., Cologne, is the technical and scientific association of manufacturers and service providers in the gas, water and media supply industry. Its goals are the establishment of high quality, safety and hygiene standards, the establishment of efficient testing and approval processes for these technologies and the creation of legal certainty for manufacturers, installers, operators and consumers.

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