



EUROPEAN ASSOCIATION
OF PUBLIC WATER OPERATORS

Farm-to-Fork Strategy – Roadmap

Response to public consultation

13 March 2020

The upcoming Farm-to-Fork Strategy announces high ambitions for sustainable food systems, with an approach that addresses the entire supply chain, taking into account health, fairness, environment and food security considerations. In this context, we emphasise that our production and consumption habits deeply affect the environment, and notably water resources in terms of **quality and quantity**.

Aqua Publica Europea, the European Association of Public Water Operators, represents 65 publicly-owned utilities providing water and sanitation services to over 70 million people throughout Europe. Based on their **technical expertise and on-the-ground knowledge**, we share a set of proposals for consideration in the discussions in view of the publication of a Farm-to-Fork Strategy.

Drinking water as the healthy, sustainable beverage alternative. The promotion of tap water aligns fully with the objectives of the Farm-to-Fork Strategy as an important element of a **healthy, affordable and environmentally sustainable diet**; as well as with the **UN's Sustainable Development Goals**¹ (SDG 6 – *Clean Water and Sanitation*) and the first-ever successful European Citizens' Initiative Right2Water². Robust EU legislation with the Drinking Water Directive ensures **high quality of water**, whilst tap water contains **healthy nutrients and no sugar**, does not require to be transported and is available **without a single-use plastic container**. Public water operators already undertake activities to raise awareness on the benefits of tap water and empower citizens to make the switch to water³.

- **Proposal 1: Promote tap water as a drinking option, in line with the Drinking Water Directive and with Green Deal objectives**

Agriculture is a main pressure on limited water resources. The overarching piece of EU water legislation, the **Water Framework Directive 2000/60/EC (WFD)**, spells out environmental imperatives by setting targets to reach '**good status**' of water bodies. Yet, according to the **European Environment Agency**⁴, only 40% of European waters were meeting this objective in 2018. Agricultural practices are identified as significant pressures on water quality and quantity, through **diffuse pollution from nutrients and pesticides** in surface waters and groundwater and **abstraction** from agriculture being one of the main causes affecting quantitative status. **Water is a finite resource, essential for life**. The **agricultural sector needs to become an ally** in the protection and preservation of water resources, for current and future generations, in particular as **our societies face immense challenges**, including climate-related water scarcity, more frequent and more intense heatwaves and floods; as well as changing demographics – all of which significantly affect farmers too.

Water objectives are insufficiently integrated into agricultural policies. The failure to meet water objectives is attributed in part to the **lack of integration with sectoral policies**, and notably with

¹ United Nations Sustainable Development: <https://sustainabledevelopment.un.org>

² Right 2 Water: <https://www.right2water.eu/>

³ Aqua Publica Europea, *Untapped: Promoting Tap Water in Europe*, 2019: <https://www.aquapublica.eu/article/news/publication-untapped-promoting-tap-water-europe>

⁴ European Environment Agency, *European waters : Assessment of status and pressures 2018*: <https://www.eea.europa.eu/publications/state-of-water>



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agricultural policy. This is highlighted in the evaluations of EU water Directives^{5 6} and by the European Court of Auditors (ECA)⁷. There are also shortcomings in the 'cross-compliance' framework under the Common Agricultural Policy, also acknowledged by the ECA⁸. So far, **agricultural policy has failed to sufficiently recognise the importance of complying with water objectives**, the Farm-to-Fork Strategy is an opportunity to bring change and address the issues in an efficient and systemic manner.

- Proposal 2: Reference objectives of the Water Framework Directive 2000/60/EC
- Proposal 3: Propose clear measures and targets for pollution reduction and environmental assessment of crop selection, to reduce the impact of agricultural activity on water resources

The need to prioritise water for drinking purposes. As matter of public health, the **availability of quality water in sufficient quantity for citizens** needs to be especially protected from **over-use** and from **pollution of catchment areas**. Today there are still cases of water abstraction being much cheaper for agricultural uses than for drinking purposes (local examples showcase a 1:10 ratio); as well as risks of catchments having to be temporarily closed due to pesticide pollution, hence depriving local populations of drinking water. Authorisations and taxation policies notably need to reflect the prioritisation of drinking water to prevent such situations, incoherent with the EU's ambitions, climate adaptation imperatives and social fairness.

- Proposal 4: Reference the Water Framework Directive's article 7 on the protection of catchment areas
- Proposal 5: Prioritise use of water for drinking purposes in upcoming policies

Cross-sectoral cooperation for a mutually beneficial transition. Cooperation across sectors is indispensable so that **different policies can effectively support each other rather than be obstacles**. This is also important considering the challenges of the different sectors, and as farmers themselves are facing pressures – from difficult market conditions to the effects of other policies, including internal market and trade. At the local level, many initiatives exist to foster cooperation **between farmers and water operators, as well as scientists and other stakeholders**. Many public water operators have developed and participated in⁹ such initiatives which foster **better understanding, development of solutions that benefit all, management of competing needs and willingness to transition** to more sustainable practices.

- Proposal 6: Recognise the benefits of local initiatives and voluntary partnership schemes for transition to sustainable practices; set-up European public multi-stakeholder fora

⁵ European Commission, *Fitness Check of the Water Framework Directive and the Floods Directive*, 2019: https://ec.europa.eu/environment/water/fitness_check_of_the_eu_water_legislation/

⁶ European Commission, *COMMISSION STAFF WORKING DOCUMENT EVALUATION of the Council Directive 91/271/EEC of 21 May 1991, concerning urban waste-water treatment*, 2019: https://ec.europa.eu/info/news/evaluation-eu-legislation-urban-waste-water-treatment-finds-it-fit-purpose-its-effectiveness-could-be-improved-2019-dec-17_en

⁷ European Court of Auditors, *Special Report no 04/2014: Integration of EU water policy objectives with the CAP: a partial success*: https://www.eca.europa.eu/Lists/ECADocuments/SR14_04/SR14_04_EN.pdf

⁸ European Court of Auditors, *Special report no 26/2016: Making cross-compliance more effective and achieving simplification remains challenging* : <https://www.eca.europa.eu/en/Pages/DocItem.aspx?did=38185>

⁹ Aqua Publica Europea, *Water and Climate: European Public Water Operator's Commitment to Water Resources Protection*, 2015: <https://www.aquapublica.eu/document/water-and-climate-european-public-water-operators-commitment-water-resources-protection>



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Transparency as a prerequisite in decision-making. The information and involvement of **citizens** is necessary for a systemic change, but it is also critical that they can voice their views as potential trade-offs in the decisions taken **directly affect them**. Awareness-raising, such as food labelling, should be considered as complementary measures to legislation, including on trade policy, to inform consumers on the origin of their food and their environmental consequences.

- Proposal 7: Complement legislative action for the promotion of sustainably-sourced food with information and labelling schemes, including on products' water footprint.

Truly fair food system considers social effects in all aspects of lives. At-source control of pollution, with a **more sustainable use of pesticides and fertilisers**, supports the preservation of water's quality and responds to zero-pollution ambitions. Less pollution means naturally healthier environments and therefore less need for water treatment. Treating water is altogether **less efficient, more energy consuming and costlier** than prevention. As EU water legislation spells out the obligation for the **recovery of costs of water services**, more treatment risks increasing water tariffs for households. In addition, local experiences¹⁰ of compensation schemes involving public water operators to support farmers' commitments to sustainability have proven efficient and less expensive alternatives to additional pollution treatment.

- Proposal 8: Apply the precautionary principle and pollution prevention to reduce environmental pollution and protect social equity
- Proposal 9: Ensure an enabling framework for subnational compensation initiatives also in the context of State-aid regulation.

Closing the loop of the circular economy. Biological materials such as **sludge resulting from the treatment of water** have great potential in a circular economy and are a source of nutrients, in alignment with the Circular Economy Action Plan. A **clear regulatory framework** would promote **trust** in these resources through **up-to-date and science-based quality requirements**, in addition to **prevention of pollution** at the source and partnerships across sectors.

- Proposal 10: Promote circularity of quality sludge through the Sewage Sludge Directive

Sustainability requires political will. Moving towards truly sustainable food systems and implementing measures with long-term benefits requires **ambitious decision-making** at all levels and **political commitments** to adopt measures and implement policies for systemic change.

More sustainable food systems positively affect society and the environment, and help face the great challenges of our times – from health to climate change and demographic changes. Therefore, we hope that the European Commission will take into account proposals to **strengthen water and food synergies** and adopt ambitious measures that foster a sustainable and future-oriented transition to better, rather than more intense, food production.

Aqua Publica Europea (APE) is the European Association of Public Water Operators. It unites publicly owned water and sanitation services and other stakeholders working to promote public water management at both European and international level. APE is an operator-led association that looks for efficient solutions that serve the public rather than corporate interests.

¹⁰ Eau de Paris, *Protection de la ressource : Eau de Paris lance son propre régime d'aide agricole*, 2020 : www.eaudeparis.fr