

## Conference Notes: Can we afford NOT to monitor Priority Pollutants?

The following represents some of the issues now coming to the surface:

Failure to comply with any individual substance EQS will result in a compliance failure for the complete water body under consideration. Every time a new substance is added to the priority list there is a strong possibility that multiple exceedances will occur for the newly nominated substance. There is concern that substantial areas of European waterways will therefore always be “out of compliance” despite vast sums of money being spent and significant improvement occurring.

There is an increasing recognition that there is little evidence to connect failing compliance with precautionary EQS values for priority substances has any significant link to the ecological quality of the water body, which is meant to be the prime target of the Directive.

There is a conflict between the WFD and other EU Regulation relating to Agrochemicals, Biocides and Pharmaceuticals and substances receiving Authorisation under REACH. In all these cases one group of regulators is evaluating the environmental risks and benefits of the substance and authorising societal use, whilst the regulators implementing the WFD are sometimes countermanding those decisions by insisting on 100% compliance with the EQS.

Cases have now arisen where a biota standard has been set by the WFD whilst EFSA have indicated that there is no risk for human consumption of the same substance at much higher concentrations.

Identification and prioritisation of substances that pose a widespread threat to European waterways remains a challenging issue. There is concern that resources will be focussed on chasing trivial issues whilst real problems are overlooked.

Monitoring requirements demanded from regulators are becoming very onerous: LOD and LOQ values for some new substances are 3-6 orders of magnitude below what can be achieved in research laboratories and the amount of monitoring required to meet the standards currently set for existing and proposed substances require extremely high financial and laboratory resources at a time when resources are being severely constrained by the economic climate.

Although proportionality and economic cost benefit are key requirements of the Directive, the economics seems to have now been forgotten during implementation