Courtesy Translation

TO
MR JOSÉ MANUEL BARROSO
PRESIDENT OF THE
EUROPEAN COMMISSION

Subject: Statement of the National Assembly of the Republic of Bulgaria on the Proposal for a Directive of the European Parliament and of the Council amending Directives 2000/60/EC and 2008/105/EC as regards priority substances in the field of water policy, COM(2011) 876

DEAR MR BARROSO,

At a regular sitting, held on 27 June 2012, the Committee on European Affairs and Oversight of the European Funds (CEAOEF) examined and adopted a Report on the Proposal for a Directive of the European Parliament and of the Council amending Directives 2000/60/EC and 2008/105/EC as regards priority substances in the field of water policy, COM(2011) 876.

The Bulgarian Parliament welcomes the proposal for a Directive which aims to promote a good surface water chemical status by setting up environmental quality standards for priority substances. Meanwhile, CEAOEF raise some concerns on the expansion of the list of priority substances and on the inclusion of higher requirements for monitoring and analysis of some of the substances as this would create an additional administrative and financial burden for the Member States.

In the framework of the intensive political dialogue, which the National Assembly leads with the European Institutions, enclosed herewith please find the approved CEAOEF Report and supporting Statement, reflecting the Bulgarian Parliament's position on the issue.

I express my belief that our fruitful cooperation will be further developed and deepened.

Enclosure: as per text

Yours sincerely,

PRESIDENT
OF THE NATIONAL ASSEMBLY:

TSETSKA TSACHEVA

Unofficial translation

NATIONAL ASSEMBLY
OF THE REPUBLIC OF BULGARIA

REPORT

OF THE COMMITTEE ON EUROPEAN AFFAIRS AND OVERSIGHT OF THE EUROPEAN FUNDS TO THE NATIONAL ASSEMBLY OF THE REPUBLIC OF BULGARIA

On the Proposal for a Directive of the European Parliament and of the Council amending Directives 2000/60/EC and 2008/105/EC as regards priority substances in the field of water policy, COM(2011) 876

After the discussion of the Proposal for a Directive of the European Parliament and of the Council amending Directives 2000/60/EC and 2008/105/EC as regards priority substances in the field of water policy COM(2011) 876, and the careful consideration of the Environment and Water Committee's statement on the Proposal for a Directive, the Committee on European Affairs and Oversight of the European Funds (CEAOEF) expresses the following statement, which is to be sent to the European institutions within the framework of the political dialogue:

1. CEAOEF welcomes the proposal for a Directive which aims to promote a good surface water chemical status and high-quality monitoring data on the latter. In the context of climate change and water resources reduction, the sustainable management of water resources is of paramount importance in the effort to eliminate the threats posed to human health and the aquatic environment.

2. The proposal for a Directive **is in compliance with the principle of subsidiarity**, established in article 5, paragraph 3 of the Treaty on European Union (TEU), because the objectives in the proposed directive can be better achieved at the EU level due to the marked transboundary nature of the problem of water pollution. As the Proposal for a Directive's Explanatory Memorandum explains, 60 % of the EU territory lies in shared river basins and many substances that cause pollution are used across the EU. These facts justify the establishment of common EU environmental quality standards.

3. Regarding the **principle of proportionality** established in article 5, paragraph 4 of the TEU, CEAOEF considers that certain provisions of the proposal for a Directive **raise doubts over its compliance with the principle of proportionality**, because they create an additional administrative and financial burden for the member-states. Furthermore, the proposal is not based on qualitative and quantitative evidence that the expenses incurred with its adoption will produce commensurate results in the desired direction:

3.1. CEAOEF considers that expanding the list of priority substances would present a serious challenge to the member-states which would need to invent and apply new analysis methods and provide additional equipment. Therefore, CEAOEF thinks that the establishment of a watch list of 25 new substances and the collection of monitoring data on these substances would create an additional administrative and financial burden for the competent authorities.

3.2. CEAOEF considers that the criteria guiding the inclusion of new substances in the priority substances list, the reviews of the list, and the determination of the referent values for monitoring are still unclear.

3.3. CEAOEF considers that the reduction of harmful emissions in the aquatic environment and the establishment of a good chemical status under the new tighter environmental quality standards will result in a direct increase of the expenses related to the modernization of the waste water treatment plants, which will create an additional financial burden.

3.4. CEAOEF considers that the inclusion of new priority substances, the modification in the status of some substances from priority to priority hazardous substances, as well as the introduction of too restrictive standards on some substances will create an additional financial burden for the industry and the agricultural sectors through the obligatory implementation of additional measures, designed to progressively reduce contamination with priority substances and to stop emissions, discharge and losses of priority hazardous substances from their source.

3.5. CEAOEF considers that the proposed lower value environmental quality standards would improve water protection efforts, and points out that in certain situations, the existing analysis methods will not be able to read the values generated by the new environmental quality standards.

3.6. CEAOEF considers that the new requirements for monitoring and analysis of the substances in certain matrices will provide each member-state with the opportunity to select a matrix for priority substances monitoring on its own. This would make the cross-country comparison of water assessment results more difficult, and would create additional financial burden given the member-states' limited experience, or lack thereof, in the use of certain matrices, and their limited ability to quickly adapt to the new analysis techniques.

4. CEAOEF recommends that the deadlines of the proposal for a Directive should be independent of the deadlines of the EU Water Framework Directive, given the need for additional time to solve the aforementioned administrative, technical, financial and scientific issues.

The Report and the attached statement were supported unanimously.

РЕПУБЛИКА БЪЛГАРИЯ
НАРОДНО СЪБРАНИЕ

ПРЕДСЕДАТЕЛ

РЕПУБЛИКА БЪЛГАРИЯ
НАРОДНО СЪБРАНИЕ
№ 250-06-140
дата 02.07.2012

ДО

Г-Н ЖОЗЕ-МАНУЕЛ БАРОЗУ
ПРЕДСЕДАТЕЛ НА
ЕВРОПЕЙСКАТА КОМИСИЯ

Относно: Становище на Народното събрание на Република България по предложението за Директива на Европейския парламент и на Съвета за изменение на директиви 2000/60/ЕО и 2008/105/ЕО по отношение на приоритетните вещества в областта на политиката на водите, COM (2011) 876

УВАЖАЕМИ ГОСПОДИН БАРОЗУ,

На заседание на Комисията по европейските въпроси и контрол на европейските фондове, проведено на 27 юни 2012 г., беше разгледан и приет доклад с включено към него становище относно предложението за Директива на Европейския парламент и на Съвета за изменение на директиви 2000/60/ЕО и 2008/105/ЕО по отношение на приоритетните вещества в областта на политиката на водите, COM (2011) 876.

Българският парламент приветства предложението за директива целяща постигане на добро химично състояние на повърхностните води, чрез установяване на стандарти за качество на околната среда за приоритетните вещества и за някои други замърсители. Същевременно, изразяваме някои **съображения във връзка с разширяването на списъка с приоритетни вещества, както и въвеждането на завишени стандарти и методи за анализ за някои от веществата,** тъй като това създава допълнителна административна и финансова тежест за държавите членки.

В рамките на активния **политически диалог**, който Народното събрание води с европейските институции, приложено Ви изпращам приетия доклад и становище към него, отразяващи позицията на българския парламент по темата.

Изразявам своята увереност, че установеното ползотворно сътрудничество ще бъде продължено и задълбочено занапред.

Приложение: съгласно текста.

С уважение,

ПРЕДСЕДАТЕЛ
НА НАРОДНОТО СЪБРАНИЕ:

ЦЕЦКА ЦАЧЕВА