



To the kind attention of **Members of ENVI Committee**

Monica Frassoni

President of the European Alliance to Save Energy (EU-ASE)
Square de Meeus, 22 A
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Brussels, 6 September 2018

Dear ENVI Committee Members,

RE: Recommendations on ENVI Committee vote on 'Quality of water intended for human consumption. Recast'

I am writing to you on behalf of the European Alliance to Save Energy (EU-ASE). We are a multi-sectoral business organisation whose members have operations across the 28 Member States of the European Union, directly employ 340.000 people in Europe and have an aggregated annual turnover of €115 bn.

We welcome the collaborative and fast-paced work of the rapporteur and shadow rapporteurs on the recast of the Drinking Water Directive. The recast is a historic first step to fix the missing dimension of the water regulatory framework, which is the energy-water nexus. There is a huge energy savings potential in the water sector that must be untapped to secure that we meet the Paris Agreement. As technology and solutions providers in energy efficiency and water, we would like to highlight our support for the following provisions ahead of the forthcoming vote in the ENVI Committee.

Energy performance transparency requirements

The energy consumption of the EU water sector represents the equivalent of 3.5% of the EU electricity consumption¹. In municipalities, water and waste water facilities account for the largest consumption of electricity, representing 30-40% of local authorities' total electricity bill². It is realistic to cut the energy use of the water and waste water sector by 50%, yet investments are below their cost-optimal levels. To untap this huge potential, a first step is to secure transparency on their energy performance. However, the state of the energy performance of the drinking water sector is not taken into consideration in the compromise amendments. This represents a missed opportunity for the drinking water sector to transition towards a more energy efficient and carbon-neutral operation and to attract investments.

An effective way to raise awareness about the energy performance and leakage reduction of the water supplier would be to make the information on the energy performance of water suppliers available online for the local governments and decision makers. Specifying the scope of the information requirement from raw water extraction to tap delivery, i.e. across the whole water supply chain, would enhance transparency on the energy use of the drinking water sector, build baseline of energy use for the detection of opportunities and be a driver towards a more energy efficient model.

¹ IEA (2016), WEO-2016 Special Report : Water-Energy Nexus

² Ibid



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Water leakage reduction target based on a common metric

A significant amount of energy and investment could be saved by monitoring and reducing water leakage, not to talk about precious water resource in times of water scarcity. Indeed, in the EU, energy to pump and distribute billions of cubic meters of water, that are lost through leaking pipes, is used in vain every day. We therefore support the introduction of provisions for Member States to introduce water leakage reduction targets, as outlined in Compromise Amendment 4 on the General Obligations of the Directive.

The European Commission estimates that, in average in the EU 23% of all treated water in public water supplies is lost within the distribution network as a result of leakage. In some municipalities, this figure can increase to 60%³.

Mandated Member State targets to combat these water losses within the distribution system would provide the EU with improved economic returns for water operators, as well as a safer drinking water supply from an environmental perspective.

However, it is important that the establishment of Member State targets is based on a common metric - cubic metres of water/km of pipe per day. This would ensure that improvements in addressing the leakage are both measurable and comparable. Without such metric, there is a risk that Member States would create arbitrary targets that would have no meaningful impact on improving leakage rates.

Water leakage comprehensive assessment

We regret that in the compromise amendments Member State competent authorities may not be obliged to carry out a comprehensive assessment of the water leakage levels on their territory which includes all relevant public health, environmental, technical, economic factors.

Including all environmental, technical, health and economic factors in a comprehensive assessment will ensure that Member State competent authorities can maintain a holistic overview over all the factors that impact on the drinking water infrastructure.

We wish you a fruitful vote and remain at your disposition for further discuss the provisions above to your best convenience.

Yours sincerely,
Monica Frassoni

President of the European Alliance to Save Energy (EU-ASE)

³ IMPACT ASSESSMENT Accompanying the document Proposal for a Directive of the European Parliament and of the Council on the quality of water intended for human consumption (recast)



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Annex – Voting Recommendations

TOPIC	ENVI Compromise	Position	Justification	Alternative
Water leakage reduction target (Article 4)	Compromise 4	SUPPORT	We support the evaluation of leakage levels and the adoption of 2030 water leakage reduction targets at national level by 2022.	
Information to the public (Article 14)	Compromise 16	PARTIALLY SUPPORT	We regret that the compromise 16 does not include Energy performance transparency requirements	We suggest supporting amendments 605 / 623 / 624 / 626 / 637 which refer to sharing information on energy consumption per cubic metre of delivered water
Information on monitoring of implementation (Article 15)	Compromise 17	PARTIALLY SUPPORT		We suggest adopting amendment Nr. 672: 'pursuant to the measures set out in Article 4(3), set up, and update annually thereafter, a data set containing information on the energy performance and leakage rates in the drinking water sector'
Information to the public (Annex IV)	Compromise 44	NO SUPPORT	We suggest opposing the compromise amendment 44 since it does not require to share information to the public on the overall performance of the water system, from raw water extraction to tap delivery, in terms of efficiency, including leakage rates expressed in percentage of water delivered and energy consumption per cubic meter of delivered water (S839)	We suggest supporting amendment Nr. 839 / 840 / 859 / 860 : 'the overall performance of the water system, from raw water extraction to tap delivery, in terms of efficiency, including leakage rates expressed in percentage of water delivered and energy consumption per cubic meter of delivered water'



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About the European Alliance to Save Energy (EU-ASE)

EU-ASE was established in December 2010 by some of Europe's leading multinational companies. The Alliance creates a platform from which our companies (1E, Danfoss, Ingersoll Rand, Kingspan, Knauf Insulation, Signify, Schneider Electric, Saint-Gobain, Siemens and Veolia) can join with politicians and thought leaders to ensure the voice of energy efficiency is heard from across the business and political community.

EU-ASE members have operations across the 28 Member States of the European Union, employ over 340.000 people in Europe and have an aggregated annual turnover of €115 billion.

Members



E3G



Other supporters of the letter include

