



**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.