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WK 12596/2024 INIT

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CONTRIBUTION

From:	General Secretariat of the Council
To:	Working Party on the Environment
N° Cion doc.:	14265/22 + ADD 1
Subject:	Priority Substances in Water: Follow-up to the WPE on 3 September 2024 – Comments from delegations

Following the call for comments (WK 10993/24 INIT) on the above, delegations will find attached comments by BE, CZ, DK, EE, IT, CY, LV, NL, AT, PL, SK, FI and SE.

BELGIUM

Table for comments – Priority substances

Table for MS comments reflecting on the amendments proposed by the EP

Notes: When completing the table, please keep the following rules:

- do not modify the table format by adding/removing/adjusting/merging/splitting cells and rows
- do not use active track-changes
- use the drop-down list in Column 3 to indicate the national position.
- please fill in and send the table in word format

EP amendment	Reference in the text	MS position	MS comment
1	Recital -1 new	Neutral	Open for discussion without reference to agriculture
2	Recital -1a new	Scrutiny reservation	doubts on the relevance
3	Recital 1	Neutral	Open for discussion without reference to agriculture
4	Recital 1a new	Scrutiny reservation	doubts on the relevance
5	Recital 1b new	Scrutiny reservation	doubts on the relevance
6	Recital 1c new	Scrutiny reservation	doubts on the relevance
7	Recital 1d new	Scrutiny reservation	doubts on the relevance
8	Recital 1e new	Neutral	Open for discussion without reference to agriculture
9	Recital 1d new	Scrutiny reservation	doubts on the relevance
10	Recital 1g new	Neutral	Open for discussion
11	Recital 1h new	Scrutiny reservation	doubts on the relevance
12	Recital 1i new	Support	
13	Recital 1j new	Scrutiny reservation	doubts on the relevance
14	Recital 1k new	Scrutiny reservation	doubts on the relevance
15	Recital 2a new	Scrutiny reservation	doubts on the relevance
16	Recital 3a new	Neutral	Open for discussion
17	Recital 3b new	Scrutiny reservation	doubts on the relevance
18	Recital 4	Not support	

EP amendment	Reference in the text	MS position	MS comment
19	Recital 4a	Not support	Open for discussion on 'that timeline should apply without prejudice to the application of stricter timelines in any other applicable Union legislation'
20	Recital 5	Neutral	Open for discussion
21	Recital 7	Neutral	Open for discussion, no support for development of guidance on source control measures
22	Recital 7a new	Neutral	Open for discussion
23	Recital 7b new	Partially support	We do not support the last sentence that the number of substances should not be limited
24	Recital 8	Not support	Not ok with the addition of "total pfas" to the GW annex
25	Recital 8a new	Scrutiny reservation	
26	Recital 8b new	Not support	Atrazine is banned and therefore moved to the list of RBSP
27	Recital 8c new	Not support	No groundwater ecosystems
28	Recital 8d new	Support	To be taken into account in future revision of list of PS
29	Recital 8d new	Not support	No groundwater ecosystems
30	Recital 9a new	Scrutiny reservation	
31	Recital 10	Scrutiny reservation	doubts on the relevance
32	Recital 10a new	Scrutiny reservation	doubts on the relevance
33	Recital 10b new	Not support	Not ok to add Sulphates in the lists, WL mechanism has to be used to put substances on the WL
34	Recital 10c new	Not support	Not Ok with ref to agriculture
35	Recital 11	Not support	Not ok with delegated acts, open for discussion on EBM
36	Recital 11a new	Neutral	Open for discussion
37	Recital 12	Not support	Recital has been deleted in compromise proposal
38	Recital 12a new	Scrutiny reservation	doubts on the relevance
39	Recital 13a new	Partially support	Already in the compromise proposal (new recitals 28a)
40	Recital 13b new	Scrutiny reservation	doubts on the relevance
41	Recital 15	Scrutiny reservation	doubts on the relevance
42	Recital 20a new	Partially support	Already in the compromise proposal (new recitals 8c)
43	Recital 21	Neutral	Open for discussion

EP amendment	Reference in the text	MS position	MS comment
44	Recital 23	Not support	Recital 23 has been slightly modified in the compromise text
45	Recital 31	Support	
46	Recital 31new	Not support	If relevant, this should already be part of the Pressure and impact analysis as part of article 5 WFD
47	Recital 31b new	Not support	
48	Recital 31c new	Not support	
49	Recital 32	Neutral	Open for discussion
50	Recital 32a new	Scrutiny reservation	doubts on the relevance
51	Recital 32b new	Partially support	Already in the compromise proposal (new recitals 14a)
52	Recital 32c new	Partially support	Already in the compromise proposal (new recitals 14a)
53	Recital 32d new	Not support	Is not related to any text proposal
54	Recital 34a new	Neutral	Open for discussion
55	Recital 34b new	Not support	doubts on the relevance
Directive 2000/60/EC			
56	Article 1 paragraph 1 point 1 introductory part	Not support	No support because it will change the meaning of Article 1
57	Article 1 paragraph 1 point 2 point c	Scrutiny reservation	To check about PMT The Council text is based on the original definition If reference to PMT is introduced, it should be added to Article 16(3)
58	Article 1 paragraph 1 point 2 d)	Neutral	Already in def 35b
59	Article 1 paragraph 1 point 2 d) a) new	Support	
60	Article 1 paragraph 1 point 2 d) b) new	Neutral	Art 16 is not deleted in compromise proposal, so reference to Art 16 can remain.
61	Article 1 paragraph 1 point 3	Support	

EP amendment	Reference in the text	MS position	MS comment
62	Article 1 paragraph 1 point 4 point 1	Not support	No support, but open to addition “ <i>That timeline shall apply without prejudice to the application of stricter timelines in any other applicable Union legislation,</i> ”
63	Article 1 paragraph 1 point 4 point ba	Not support	Protected areas is already covered by article 4.1.c)
64	Article 1 paragraph 1 point 6 point a	Not support	NO Delegated Acts Keep Council text (intercalibration and timing)
65	Article 1 paragraph 1 point 6 point a) a) new	Neutral	We believe this proposal is unrealistic but we leave it leave it to the COM comment on this
66	Article 1 paragraph 1 point 6 b)	Not support	Reporting to be limited to monitoring data only 1/3year (instead of yearly) and status reporting only 1/6year (as part of the RBMP)
67	Article 1 paragraph 1 point 7 a new	Not support	Already in 4(1) aa iii. No need in Art 11
68	Article 1 paragraph 1 point 7 b) new	Not support	No need to stress out agriculture.
69	Article 1 paragraph 1 point 8 a new	Not support	reviewing the permit can already lead to the suspension of it
70	Article 1 paragraph 1 point 9	Not support	1 st part: Reintroduced in the Council text. 2 nd part: strange
71	Article 1 paragraph 1 point 9	Not support	
72	Article 1 paragraph 1 point 9 a	Not support	
73	Article 1 paragraph 1 point 9 a new	Not support	
74	Article 1 paragraph 1 point 10	Not support	
75	Article 1 paragraph	Not support	Reporting om POM has no added value

EP amendment	Reference in the text	MS position	MS comment
	1 point 10 a new		
76	Article 1 paragraph 1 point 12 point b	Not support	Reporting om POM has no added value
77	Article 1 paragraph 1 point 18a new	Not support	administrative burden
78	Article 1 paragraph 1 point 20	Support	
Directive 2006/118/EC			
79	Article 2 paragraph 1 point 2	Support	
80	Article 2 paragraph 1 point 2	Not support	we do not agree with the introduction of the concepts of "groundwater ecosystems" and "GW ecological status" in the text of the directive. As stated in the new recital 8c of the compromise text, work needs to be done first to establish a methodology to identify such ecosystems.
81	Article 2 paragraph 1 point 4 point a) a) new	Not support	
82	Article 2 paragraph 1 point 4 point c)	Partially support	Maybe but not really useful -> better in recitals
83	Article 2 paragraph 1 point 4 point d)	Support	
84	Article 2 paragraph 1 point 4 a new	Support	
85	Article 2 paragraph 1 point 6	Partially support	Number of parameters : Ok to accept a "maximum" slightly higher than 5 but not a minimum ; indicator in watch list – not really against but only if no other methods exists
86	Article 2 paragraph 1 point 6	Not support	no for sulfates in the WL (these are already in annexes), addition of new parameters (such as indicators of AMR) should be done based on WL procedure
87	Article 2 paragraph 1 point 6	Partially support	Only if methods related to measurements of indicators of pollution are provided

EP amendment	Reference in the text	MS position	MS comment
88	Article 2 paragraph 1 point 6	Not support	Not ok with the addition of "groundwater ecosystems" in the text (the rest = Neutral)
89	Article 2 paragraph 1 point 6	Not support	No more than every 3 years!
90	Article 2 paragraph 1 point 6	Not support	Keep alignment with RBMP cycle (6y)
91	Article 2 paragraph 1 point 6	Neutral	Open to discussion about minimal number of monitoring stations
92	Article 2 paragraph 1 point 6 a new	Not support	we do not agree with the introduction of the concepts of "groundwater ecosystems" and "GW ecological status" in the text of the directive. As stated in the new recital 8c of the compromise text, work needs to be done first to establish a methodology to identify such ecosystems.
93	Article 2 paragraph 1 point 6 b) new	Not support	Unclear and already in place in RBMP
94	Article 2 paragraph 1 point 6 c) new	Not support	First an assessment needs to be done on the options to set up a Joint Monitoring facility, financing of the monitoring costs should be part of this assessment - See article 8.6 compromise proposal
95	Article 2 paragraph 1 point 6 d) new	Scrutiny reservation	Support for a Joint Monitoring Facility, but options to be assessed by COM, see article 8.6 compromise proposal
96	Article 2 paragraph 1 point 7	Not support	Keep alignment with RBMP cycle (6y)
97	Article 2 paragraph 1 point 7	Partially support	First part already in compromise (art 8 parag 1, 2 and 3) No go for delegated act
98	Article 2 paragraph 1 point 7	Not support	Stick to compromise proposal
99	Article 2 paragraph 1 point 7	Support	
100	Article 2 paragraph 1 point 7	Support	Added in compromise text, point h
101	Article 2 paragraph 1 point 7	Not support	No go for adoption of Total PFAS QS by delegated act: it is before needed to start a monitoring and see what happens with the results

EP amendment	Reference in the text	MS position	MS comment
102	Article 2 paragraph 1 point 7	Neutral	Open to discussion on deadlines to be set for ECHA's reporting obligations, keep the frequency aligned with RBMP planning cycle (6y)
103	Article 2 paragraph 1 point 8	Not support	No added value Not ok with delegated act., DA only for 8(5). Open for discussion for how long power is conferred to Commission
104	Article 2 paragraph 1 point 8	Not support	To be updated only DA for 8(5)
105	Article 2 paragraph 1 point 8	Support	
106	Article 2 paragraph 1 point 8	Not support	To be updated only DA for 8(5)
107	Article 2 paragraph 1 point 14	Not support	Not really relevant as it is already included in annex 4
Directive 2008/105/EC			
108	Article 3 paragraph 1 point 1a new	Not support	COM proposal to be maintained to keep RBSP
109	Article 3 paragraph 1 point 3 point a	Not support	the compromise text is in line with IED
110	Article 3 paragraph 1 point 3 point a	Not support	the compromise text is in line with IED
111	Article 3 paragraph 1 point 3 point a	Not support	the compromise text is in line with IED
112	Article 3 paragraph 1 point 3 point c)	Not support	the compromise text is in line with IED
113	Article 3 paragraph 1 point 3 point c)	Not support	the compromise text is in line with IED
114	Article 3 paragraph 1 point 4	Not support	
115	Article 3 paragraph 1 point 4	Support	to be added to article 16(6)

EP amendment	Reference in the text	MS position	MS comment
116	Article 3 paragraph 1 point 4 a new	Scrutiny reservation	See also new article 5(5) and article 16(6) of compromise
117	Article 3 paragraph 1 point 5	Not support	Keep alignment with RBMP planning cycle (6y),
118	Article 3 paragraph 1 point 5	Support	Is integrated in art 16(2) of compromise
119	Article 3 paragraph 1 point 5	Support	Is integrated in art 16(4) of compromise
120	Article 3 paragraph 1 point 5	Partially support	OK to develop a method for PFAS total, NOK to adopt the method or the EQS by DA
121	Article 3 paragraph 1 point 5	Partially support	we support the development for a methodology for Bisphenol total and an EQS, but we do not support the adoption by DA
122	Article 3 paragraph 1 point 5	Partially support	Keep alignment with RBMP planning cycle (6y),
123	Article 3 paragraph 1 point 6	Partially support	Presenting the extent of the deviations is necessary but should not be mandatory for ALL deviations. We prefer the “may” form to the “shall” form. It’s up to the Member States to present what is relevant
124	Article 3 paragraph 1 point 6	Not support	This restrains the possibility to monitor some PBT less intensively. It’s up to the Member States to determine a sufficient frequency for each PBT in each waterbody
125	Article 3 paragraph 1 point 6	Partially support	We are supportive of EBM, but we do not support the DA Moreover, the extension of EBM use for extra substances should be evaluated in light of the costs generated for Member States.
126	Article 3 paragraph 1 point 7	Not support	The WL should contain a maximum of substances, not a minimum and the 3-yearly basis for updating it should be maintained. The addition of substances to the list has to follow the WL procedure indicators of pollution: is not defined, so to be nuanced for cases where this is relevant such as for AMR
127	Article 3 paragraph 1 point 7	Not support	The addition of substances to the list has to follow the WL procedure
128	Article 3 paragraph 1 point 7	Partially support	indicators of pollution: is not defined, so to be nuanced for cases where this is relevant such as for AMR

EP amendment	Reference in the text	MS position	MS comment
129	Article 3 paragraph 1 point 7	Scrutiny reservation	
130	Article 3 paragraph 1 point 7	Not support	The updates of the WL should remain on a 3-yearly basis, no updates in between Keep alignment with RBMP planning cycle (6y), evaluation of impact (if any) should be part of evaluation report of ECHA
131	Article 3 paragraph 1 point 7	Not support	Too detailed
132	Article 3 paragraph 1 point 7 a)	Not support	First an assessment needs to be done on the options to set up a Joint Monitoring facility, financing of the monitoring costs should be part of this assessment - See article 8.6 compromise proposal
133	Article 3 paragraph 1 point 7 b)	Scrutiny reservation	Support for a Joint Monitoring Facility, but options to be assessed by COM, see article 8.6 compromise proposal
134	Article 3 paragraph 1 point 8	Support	But it is better to integrate this in article 8(d)1
135	Article 3 paragraph 1 point 8a new	Not support	No DA for the adoption of EQS. Open for discussion for how long power is conferred to Commission
136	Article 3 paragraph 1 point 8 b new	Not support	No DA
137	Article 3 paragraph 1 point 8 c new	Not support	No DA
138	Article 3 paragraph 1 point 8 d new	Not support	No DA
Annexes			
139	Annex I paragraph 1 point 10 a new	Not support	Too detailed
140	Annex I paragraph 1 point 18	Not support	
141	Annex II paragraph 1 point 1	Not support	

EP amendment	Reference in the text	MS position	MS comment
142	Annex III	Not support	Compromise text erased this note
143	Annex III	Not support	Not relevant to add this : already in the WFD
144	Annex III	Not support	No division by 2 without any reason. Footnotes are not relevant : these values are QS, not TV!
145	Annex III	Not support	OK to develop a method for PFAS total, NOK to adopt the method or the QS by DA
146	Annex III	Not support	No, align with EQSD, not 100 time less
147	Annex III	Not support	We do not agree to introduce a QS for pharma total not relevant
148	Annex III	Partially support	Ok to delete categories; but NOK to use the lowest value (same as relevant!!).
149	Annex IV	Not support	NOK, in case pollutant or indicators are not relevant.
150	Annex V paragraph 1 point 2	Not support	
151	Annex V paragraph 1 point 2	Not support	
152	Annex V paragraph 1 point 2	Not support	
153	Annex V paragraph 1 point 2	Partially support	OK to develop a method for PFAS total, NOK to adopt the method or the EQS by DA
154	Annex V paragraph 1 point 2	Not support	We do not agree to introduce an EQS for pharma total
155	Annex VI	Not support	
156	Annex VI	Scrutiny reservation	

CZECH REPUBLIC

Table for comments – Priority substances

Table for MS comments reflecting on the amendments proposed by the EP

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1	Recital -1 new	Choose an option ↓	
2	Recital -1a new	Choose an option ↓	
3	Recital 1	Choose an option ↓	
4	Recital 1a new	Choose an option ↓	
5	Recital 1b new	Choose an option ↓	
6	Recital 1c new	Choose an option ↓	
7	Recital 1d new	Choose an option ↓	
8	Recital 1e new	Choose an option ↓	
9	Recital 1d new	Choose an option ↓	
10	Recital 1g new	Choose an option ↓	
11	Recital 1h new	Choose an option ↓	
12	Recital 1i new	Choose an option ↓	
13	Recital 1j new	Choose an option ↓	
14	Recital 1k new	Choose an option ↓	
15	Recital 2a new	Choose an option ↓	
16	Recital 3a new	Choose an option ↓	
17	Recital 3b new	Choose an option ↓	

EP amendment	Reference in the text	MS position	MS comment
18	Recital 4	Not support	If a substance has been found not to be relevant in a Member State, there is no need to set thresholds.
19	Recital 4a	Not support	The obligation to achieve good status, where the deadlines are already mentioned, is sufficient.
20	Recital 5	Not support	Toxicity is already mentioned. The current proposal also includes a watch list and ECHA's involvement ensures this better.
21	Recital 7	Neutral	
22	Recital 7a new	Neutral	
23	Recital 7b new	Not support	We particularly disagree with the last sentence.
24	Recital 8	Not support	The Commission's proposal addresses this by reference to the Drinking Water Directive.
25	Recital 8a new	Choose an option ↓	
26	Recital 8b new	Scrutiny reservation	We request the inclusion of atrazine metabolites, which cause significant problems in the Czech Republic.
27	Recital 8c new	Choose an option ↓	
28	Recital 8d new	Support	
29	Recital 8d new	Not support	Fundamental disagreement Groundwater ecosystems are not subject to protection in the WFD (they cannot be clearly defined). The object of protection is groundwater as such (and then the sites where it is needed), the associated surface water ecosystems and the associated terrestrial ecosystems. More stringent thresholds can be set for these, but then they are only applicable where needed, not for all groundwater.
30	Recital 9a new	Choose an option ↓	
31	Recital 10	Choose an option ↓	
32	Recital 10a new	Choose an option ↓	
33	Recital 10b new	Choose an option ↓	
34	Recital 10c new	Choose an option ↓	
35	Recital 11	Choose an option ↓	
36	Recital 11a new	Not support	It already exists. We don't know what "vulnerable sites" are. We cannot comment on the proposal without a definition.

EP amendment	Reference in the text	MS position	MS comment
37	Recital 12	Choose an option ↓	
38	Recital 12a new	Choose an option ↓	
39	Recital 13a new	Choose an option ↓	
40	Recital 13b new	Choose an option ↓	
41	Recital 15	Choose an option ↓	
42	Recital 20a new	Not support	These are typical related terrestrial ecosystems and the Directive already takes these into account. However, in many countries karsts are rare (e.g. the CZ) or do not occur at all. Therefore, there is no need to tighten thresholds or quality standards for all groundwater.
43	Recital 21	Choose an option ↓	
44	Recital 23	Choose an option ↓	
45	Recital 31	Choose an option ↓	
46	Recital 31new	Choose an option ↓	
47	Recital 31b new	Choose an option ↓	
48	Recital 31c new	Not support	Access to justice is sufficiently ensured by other EU legislation
49	Recital 32	Neutral	We are not concerned about the inclusion of cooperation with non-member states and the risk of wars.
50	Recital 32a new	Choose an option ↓	
51	Recital 32b new	Choose an option ↓	
52	Recital 32c new	Support	We agree with the mention of a joint monitoring facility.
53	Recital 32d new	Neutral	We agree in principle with the need to increase funding for water management and to involve EU funds more but would prefer more general wording.
54	Recital 34a new	Support	We have no problem with the mention of digital tools.
55	Recital 34b new	Support	OK - increasing competences, access to information in all languages.
Directive 2000/60/EC			
56	Article 1 paragraph 1 point 1	Choose an option ↓	

EP amendment	Reference in the text	MS position	MS comment
	introductory part		
57	Article 1 paragraph 1 point 2 point c	Support	
58	Article 1 paragraph 1 point 2 d)	Support	
59	Article 1 paragraph 1 point 2 d) a) new	Support	Updating the Drinking Water Directive
60	Article 1 paragraph 1 point 2 d) b) new	Support	
61	Article 1 paragraph 1 point 3	Partially support	We disagree and prefer the text that has been approved by the EC. The EP proposal duplicates existing WFD requirements.
62	Article 1 paragraph 1 point 4 point 1	Support	Already resolved.
63	Article 1 paragraph 1 point 4 point ba	Scrutiny reservation	We do not understand what is meant by the last sentence of the paragraph.
64	Article 1 paragraph 1 point 6 point a	Not support	We do not wish to change the scope of the delegated acts from the compromise negotiated at the WPE.
65	Article 1 paragraph 1 point 6 point a) a) new	Not support	We do not wish to change the scope of the delegated acts from the compromise negotiated at the WPE.
66	Article 1 paragraph 1 point 6 b)	Support	We are neutral on the proposal that the EC should publish a report on the possibilities of online monitoring within two years.
67	Article 1 paragraph 1 point 7 a new	Neutral	Already resolved.
68	Article 1 paragraph 1 point 7 b) new	Not support	We see no added value compared to the original text.
69	Article 1 paragraph	Partially support	We do not consider it necessary to specifically mention agriculture.

EP amendment	Reference in the text	MS position	MS comment
	1 point 8 a new		
70	Article 1 paragraph 1 point 9	Not support	We can live with the refined wording.
71	Article 1 paragraph 1 point 9	Not support	We do not see added value compared to the EC proposal.
72	Article 1 paragraph 1 point 9 a	Not support	Prefer EC proposal – longer time limit for States to respond to another State's notification.
73	Article 1 paragraph 1 point 9 a new	Not support	Commission does not have the right to reject watershed plans, must address infringement.
74	Article 1 paragraph 1 point 10	Not support	Access to justice is sufficiently ensured by other EU legislation.
75	Article 1 paragraph 1 point 10 a new	Not support	We insist on the deletion of Article 15(3).
76	Article 1 paragraph 1 point 12 point b	Not support	We insist on the deletion of Article 18(4).
77	Article 1 paragraph 1 point 18a new	Not support	
78	Article 1 paragraph 1 point 20	Choose an option ↓	
Directive 2006/118/EC			
79	Article 2 paragraph 1 point 2	Neutral	
80	Article 2 paragraph 1 point 2	Not support	Fundamental disagreement We fundamentally disagree with the assessment of the ecological status of groundwater.
81	Article 2 paragraph 1 point 4 point a) a) new	Not support	Fundamental disagreement Groundwater ecosystems are not subject to protection in the WFD (nor can they be clearly defined). The object of protection is groundwater as such (and then the sites where it is needed), the associated surface water ecosystems and the associated terrestrial ecosystems. More stringent thresholds can be set for these, but then they are

EP amendment	Reference in the text	MS position	MS comment
			only applicable where needed, not for all groundwater.
82	Article 2 paragraph 1 point 4 point c)	Choose an option ↓	
83	Article 2 paragraph 1 point 4 point d)	Choose an option ↓	
84	Article 2 paragraph 1 point 4 a new	Choose an option ↓	
85	Article 2 paragraph 1 point 6	Not support	Fundamental disagreement Paragraph 1 - It may not even be possible to assess 5 substances. Paragraph 2 - All the substances monitored are groundwater pollution indicators. Paragraph 3 - Not relevant for groundwater.
86	Article 2 paragraph 1 point 6	Neutral	
87	Article 2 paragraph 1 point 6	Not support	Fundamental disagreement All the substances monitored are indicators of groundwater pollution.
88	Article 2 paragraph 1 point 6	Not support	Fundamental disagreement Groundwater ecosystems are not protected in the WFD (they cannot be clearly defined). The subject of protection is groundwater as such (and then sites where it is needed), associated surface water ecosystems and associated terrestrial ecosystems. More stringent thresholds can be set for these, but then they are only applicable where needed, not for all groundwater.
89	Article 2 paragraph 1 point 6	Neutral	
90	Article 2 paragraph 1 point 6	Not support	The proposal to reassess the impact of industrial activities related to energy transition on water quality every two years would impose an excessive administrative burden on MS.
91	Article 2 paragraph 1 point 6	Support	
92	Article 2 paragraph 1 point 6 a new	Not support	Fundamental disagreement We fundamentally disagree with the assessment of the ecological status of groundwater.

EP amendment	Reference in the text	MS position	MS comment
93	Article 2 paragraph 1 point 6 b) new	Not support	Fundamental disagreement We fundamentally disagree with the assessment of the ecological status of groundwater.
94	Article 2 paragraph 1 point 6 c) new	Neutral	
95	Article 2 paragraph 1 point 6 d) new	Partially support	The EP's proposal for a joint monitoring facility has already been incorporated into Article 7(6). We agree with the establishment of the monitoring facility and prefer the conditions set out in the EC
96	Article 2 paragraph 1 point 7	Not support	Fundamental disagreement The WFD has a cycle of 6 years. There would be a heavy administrative burden on the MS.
97	Article 2 paragraph 1 point 7	Not support	We do not wish to change the scope of the delegated acts compared to the compromise negotiated at the WPE.
98	Article 2 paragraph 1 point 7	Not support	We do not wish to change the scope of the delegated acts compared to the compromise negotiated at the WPE.
99	Article 2 paragraph 1 point 7	Not support	It is not clear to us how it will be carried out for groundwater.
100	Article 2 paragraph 1 point 7	Choose an option ↓	
101	Article 2 paragraph 1 point 7	Not support	Already resolved by reference to DWD.
102	Article 2 paragraph 1 point 7	Not support	Fundamental disagreement We request that the six-year cycle be maintained.
103	Article 2 paragraph 1 point 8	Partially support	We are unable to assess the administrative conditions for delegated acts. The article should be in line with the arrangements in similar directives.
104	Article 2 paragraph 1 point 8	Not support	We do not wish to change the scope of the delegated acts compared to the compromise negotiated at the WPE.
105	Article 2 paragraph 1 point 8	Choose an option ↓	
106	Article 2 paragraph 1 point 8	Not support	We do not wish to change the scope of the delegated acts compared to the compromise negotiated at the WPE.
107	Article 2 paragraph 1 point 14	Not support	Fundamental disagreement Groundwater is not monitored frequently enough to detect seasonal trends.
Directive 2008/105/EC			

EP amendment	Reference in the text	MS position	MS comment
108	Article 3 paragraph 1 point 1a new	Not support	Article 16 of the WFD also allows the setting of EQS for certain specific pollutants (RBSP). Please clarify whether this is an attempt to remove the term "certain other pollutants" from Annex II of the EQSD.
109	Article 3 paragraph 1 point 3 point a	Scrutiny reservation	We request a detailed explanation. The relevant EU Regulation on IEP has already been issued (Regulation 2024/1244)
110	Article 3 paragraph 1 point 3 point a	Scrutiny reservation	We request a detailed explanation. The EU Regulation on IEP in question has already been issued (Regulation 2024/1244)
111	Article 3 paragraph 1 point 3 point a	Scrutiny reservation	Please provide a detailed explanation. The EU IRZ Regulation on IEP in question has already been issued (Regulation 2024/1244)
112	Article 3 paragraph 1 point 3 point c)	Scrutiny reservation	Please provide a detailed explanation.
113	Article 3 paragraph 1 point 3 point c)	Scrutiny reservation	Please provide a detailed explanation.
114	Article 3 paragraph 1 point 4	Not support	On what data will the Commission assess when river basin plans are reported every 6 years and status assessment (progress of measures) after 3 years? Suggest changing to "every three years"
115	Article 3 paragraph 1 point 4	Support	We request a sufficient period of time to prepare and implement source cessation measures.
116	Article 3 paragraph 1 point 4 a new	Support	
117	Article 3 paragraph 1 point 5	Not support	Fundamental disagreement The WFD has a cycle of 6 years. There would be a heavy administrative burden on the MS.
118	Article 3 paragraph 1 point 5	Not support	We do not wish to change the scope of the delegated acts compared to the compromise negotiated at the WPE.
119	Article 3 paragraph 1 point 5	Support	
120	Article 3 paragraph 1 point 5	Support	

EP amendment	Reference in the text	MS position	MS comment
121	Article 3 paragraph 1 point 5	Support	Bisphenol AF should also be included, which is under assessment as an endocrine disruptor. There are also studies on the endocrine effects of Bisphenol AP, which we also request to add.
122	Article 3 paragraph 1 point 5	Neutral	
123	Article 3 paragraph 1 point 6	Support	From the deviations it would be possible to see the possible evolution after the implementation of the measures, although good chemical status will still not be achieved.
124	Article 3 paragraph 1 point 6	Support	
125	Article 3 paragraph 1 point 6	Support	However, Member States MAY decide to monitor the 3 estrogenic hormones E1, E2 and EE2 by EBM.
126	Article 3 paragraph 1 point 7	Not support	We request to keep the original EC proposal.
127	Article 3 paragraph 1 point 7	Support	
128	Article 3 paragraph 1 point 7	Support	
129	Article 3 paragraph 1 point 7	Support	
130	Article 3 paragraph 1 point 7	Not support	
131	Article 3 paragraph 1 point 7	Not support	We request that the original EC proposal be retained.
132	Article 3 paragraph 1 point 7 a)	Support	
133	Article 3 paragraph 1 point 7 b)	Partially support	The EP's proposal for a joint monitoring facility has already been incorporated into Article 7(6). We agree with the establishment of the monitoring facility and prefer the conditions set out in the EC version.
134	Article 3 paragraph 1 point 8	Support	In the CZ it is already underway for two metals (Pb and Ni). As it is written, it would have to be for every metal. It would be more appropriate to state this as a general proclamation within the Recital with "where practical".
135	Article 3 paragraph	Neutral	

EP amendment	Reference in the text	MS position	MS comment
	1 point 8a new		
136	Article 3 paragraph 1 point 8 b new	Neutral	
137	Article 3 paragraph 1 point 8 c new	Support	
138	Article 3 paragraph 1 point 8 d new	Neutral	
Annexes			
139	Annex I paragraph 1 point 10 a new	Not support	We disagree with the last sentence of the paragraph. The rest we agree.
140	Annex I paragraph 1 point 18	Not support	Fundamental disagreement Groundwater is not monitored frequently enough to detect seasonal trends.
141	Annex II paragraph 1 point 1	Choose an option ↓	
142	Annex III	Not support	
143	Annex III	Not support	Fundamental disagreement Groundwater ecosystems are not protected in the WFD (nor can they be clearly defined). The object of protection is groundwater itself (and then the sites where it is needed), associated surface water ecosystems and associated terrestrial ecosystems. More stringent thresholds can be set for these, but then they are only applicable where needed, not for all groundwater.
144	Annex III	Not support	Fundamental disagreement We request the wording proposed by the EC.
145	Annex III	Not support	Already resolved.
146	Annex III	Not support	Fundamental disagreement We request the wording proposed by the EC.
147	Annex III	Not support	Fundamental disagreement We request the wording proposed by the EC.
148	Annex III	Support	We support the EP text.
149	Annex IV	Not support	
150	Annex V paragraph 1 point 2	Support	

EP amendment	Reference in the text	MS position	MS comment
151	Annex V paragraph 1 point 2	Not support	Fundamental disagreement The EC's proposed EQS-AA according to the Dossier was 0.125 microg/l with respect to human health. In terms of ecotoxicity to aquatic organisms, this value would be significantly higher (in the lower tens of micrograms/l). Therefore, the EC proposal is sufficient. If this stricter standard were to be adopted, the result of the assessment of the RBMP for the 3rd plans is that 43 % of the values would be met. The other 38 % of the values (annual average) could not be assessed due to the high limit of quantification of 0.2 and 0.25 microg/l. Within the EU there are a number of other Member States where the limit of quantification is equal to or higher than 0.1 microg/l.
152	Annex V paragraph 1 point 2	Support	The EC has proposed an EQS-AA at a very low level of 0.17ng/l. The limit of quantification closest to the EQS-AA in the Czech Republic is 5 ng. Bisphenol A is being substituted by other bisphenols, of which there is also another adverse effect on the human hormonal system. Therefore, the tendency to set an EQS for the sum of selected bisphenols is correct. At present there are 3 representatives on the EU List of Endocrine Disruptors: Bisphenol A, Bisphenol B and Bisphenol S. The subject of the assessment is Bisphenol AF. The scale of production, the use of each representative and the strength of their effect (in relation to BP-A) should also be taken into account.
153	Annex V paragraph 1 point 2	Support	Comment as for EP amendment 152.
154	Annex V paragraph 1 point 2	Not support	Fundamental disagreement There are pharmaceuticals in the proposal for new priority substances whose proposed EQS already exceed this newly proposed EQS (sum) - carbamazepine and erythromycin. Would the EQS apply only to the pharmaceuticals which are priority substances or to all monitored pharmaceuticals? It is difficult, even impossible, to set a single EQS for such a wide group of pharmaceuticals and with such different ecotoxicities. We see a way out in the use of effect-based methods that include the synergistic effect of a mixture of all foreign substances in a surface water sample. In the case of antibiotics, the aspect of antimicrobial resistance is considered.
155	Annex VI	Neutral	

EP amendment	Reference in the text	MS position	MS comment
156	Annex VI	Support	We agree with use where there is sufficient research and models exist to determine bioavailability. Currently bioavailability is considered for Pb and Ni (NEK-RP). There is a possibility to determine bioavailability of Cu and Zn at present.

DENMARK

Table for comments – Priority substances

Table for MS comments reflecting on the amendments proposed by the EP

Notes: When completing the table, please keep the following rules:

- do not modify the table format by adding/removing/adjusting/merging/splitting cells and rows
- do not use active track-changes
- use the drop-down list in Column 3 to indicate the national position.
- please fill in and send the table in word format

EP amendment	Reference in the text	MS position	MS comment
1	Recital -1 new	Choose an option ↓	
2	Recital -1a new	Choose an option ↓	
3	Recital 1	Choose an option ↓	
4	Recital 1a new	Choose an option ↓	
5	Recital 1b new	Choose an option ↓	
6	Recital 1c new	Choose an option ↓	
7	Recital 1d new	Choose an option ↓	
8	Recital 1e new	Choose an option ↓	
9	Recital 1d new	Choose an option ↓	
10	Recital 1g new	Choose an option ↓	
11	Recital 1h new	Choose an option ↓	
12	Recital 1i new	Choose an option ↓	
13	Recital 1j new	Choose an option ↓	
14	Recital 1k new	Choose an option ↓	
15	Recital 2a new	Choose an option ↓	
16	Recital 3a new	Choose an option ↓	
17	Recital 3b new	Choose an option ↓	

EP amendment	Reference in the text	MS position	MS comment
18	Recital 4	Choose an option ↓	
19	Recital 4a	Choose an option ↓	
20	Recital 5	Choose an option ↓	
21	Recital 7	Choose an option ↓	
22	Recital 7a new	Choose an option ↓	
23	Recital 7b new	Choose an option ↓	
24	Recital 8	Choose an option ↓	
25	Recital 8a new	Choose an option ↓	
26	Recital 8b new	Choose an option ↓	
27	Recital 8c new	Choose an option ↓	
28	Recital 8d new	Choose an option ↓	
29	Recital 8d new	Choose an option ↓	
30	Recital 9a new	Choose an option ↓	
31	Recital 10	Choose an option ↓	
32	Recital 10a new	Choose an option ↓	
33	Recital 10b new	Choose an option ↓	
34	Recital 10c new	Choose an option ↓	
35	Recital 11	Choose an option ↓	
36	Recital 11a new	Choose an option ↓	
37	Recital 12	Choose an option ↓	
38	Recital 12a new	Choose an option ↓	
39	Recital 13a new	Choose an option ↓	
40	Recital 13b new	Choose an option ↓	
41	Recital 15	Choose an option ↓	

EP amendment	Reference in the text	MS position	MS comment
42	Recital 20a new	Choose an option ↓	
43	Recital 21	Choose an option ↓	
44	Recital 23	Choose an option ↓	
45	Recital 31	Choose an option ↓	
46	Recital 31new	Choose an option ↓	
47	Recital 31b new	Choose an option ↓	
48	Recital 31c new	Choose an option ↓	
49	Recital 32	Choose an option ↓	
50	Recital 32a new	Choose an option ↓	
51	Recital 32b new	Choose an option ↓	
52	Recital 32c new	Choose an option ↓	
53	Recital 32d new	Choose an option ↓	
54	Recital 34a new	Choose an option ↓	
55	Recital 34b new	Choose an option ↓	
Directive 2000/60/EC			
56	Article 1 paragraph 1 point 1 introductory part	Support	Ok, correction of the text (point e) is duly added)
57	Article 1 paragraph 1 point 2 point c	Not support	Support Council Coreper mandate (EP text unnecessary, as it is already covered by 'giving rise to an equivalent level of concern).
58	Article 1 paragraph 1 point 2 d)	Not support	Support Council Coreper mandate. (Keeps no 35 and add new 35b on trigger values)
59	Article 1 paragraph 1 point 2 d) a) new	Support	Ok, correction of the text (newer directive is referenced).
60	Article 1 paragraph 1 point 2 d) b) new	Support	Ok, correction of the text (reference to Directive 2008/105/EC is included)

EP amendment	Reference in the text	MS position	MS comment
61	Article 1 paragraph 1 point 3	Not support	Support Council Coreper mandate (already a compromise on transboundary cooperation).
62	Article 1 paragraph 1 point 4 point 1	Not support	Support the Coreper mandate. (EP extending the environmental objective and the scope of the WFD).
63	Article 1 paragraph 1 point 4 point ba	Not support	Support the Coreper mandate. (The procedure for deriving EQS provides protection to the most sensitive receptor in the most relevant compartment or matrix (cf. part B new annex II to the EQSD)).
64	Article 1 paragraph 1 point 6 point a	Support	Prefer implementing acts over delegated acts, but prefer delegation to OLP
65	Article 1 paragraph 1 point 6 point a) a) new	Partially support	COM to publish report re. real-time (online) pollution monitoring systems and adopt implementing act. Support report but not implementing act
66	Article 1 paragraph 1 point 6 b)	Not support	Firmly support Council Coreper mandate re. monitoring data to be made available every 3 years, but flexible on text on making the monitoring data easily accessible to the public.
67	Article 1 paragraph 1 point 7 a new	Partially support	Support the amendment in principle – but should be placed as a new para in art. 11 (4bis) Regulering ved kilden, som sådan en god idé men udtryk for detailregulering. Hvor detaljeret skal indgangen til indsatsprogrammet være?)
68	Article 1 paragraph 1 point 7 b) new	Not support	Support Coreper mandate that is not mentioning agriculture (None mentioned, none forgotten)
69	Article 1 paragraph 1 point 8 a new	Support	Relevant. Could be considered in art. 11 WFD
70	Article 1 paragraph 1 point 9	Not support	Support the Coreper mandate – which is already a compromise as the amendment is covered by Art. 12(4).
71	Article 1 paragraph 1 point 9	Neutral	Art 12: MS to react to each other within 2 or 3 months
72	Article 1 paragraph 1 point 9 a	Not support	Object to COM being mandated to reject the RBMPs – this is the competence of the MS.
73	Article 1 paragraph	Scrutiny reservation	This could be dealt with in a preamble (Access to Justice)

EP amendment	Reference in the text	MS position	MS comment
	1 point 9 a new		
74	Article 1 paragraph 1 point 10	Support	Can support, in the spirit of compromise
75	Article 1 paragraph 1 point 10 a new	Support	Can support, in the spirit of compromise
76	Article 1 paragraph 1 point 12 point b	Support	Can support maintaining Art 18(4) WFD on COM status report to EP & Council
77	Article 1 paragraph 1 point 18a new	Neutral	Purpose is unclear (summary of measures towards digitisation of the water sector)
78	Article 1 paragraph 1 point 20	Support	Correction of text (already corrected in Coreper mandate)
Directive 2006/118/EC			
79	Article 2 paragraph 1 point 2	Partially support	Support the idea in principle, however the concept of establishing a hierarchy of measures is better placed in Art. 11 WFD. (cf. amn 115)
80	Article 2 paragraph 1 point 2	Not support	In principle it could be relevant, but is premature. Scientific basis for such assessment is missing. Good ecological status of groundwater is undefined. Hvorfor er det vigtigt?
81	Article 2 paragraph 1 point 4 point a) a) new	Not support	No scientific basis for this proposal (THV 10 times stricter for gw than sw). Threshold values for groundwater should not be established on the basis of EQS for surface water. In addition, different substances are relevant to surface water and groundwater, respectively. (cf. amn 146)
82	Article 2 paragraph 1 point 4 point c)	Not support	Superfluous: Already covered by first subparagraph of that paragraph 5. All thresholds values are to be published in the RBMPs.
83	Article 2 paragraph 1 point 4 point d)	Neutral	Reference to PPP (unnecessary)
84	Article 2 paragraph 1 point 4 a new	Neutral	Flexible re. COM to publish a report on MS' national threshold values
85	Article 2 paragraph 1 point 6	Partially support	Flexibility towards more than 5 substances, but with an upper limit on number of substances on the list. (Increased costs are limited)

EP amendment	Reference in the text	MS position	MS comment
86	Article 2 paragraph 1 point 6	Partially support	18 months is not realistic. But flexibility on considering sulphates included on the list.
87	Article 2 paragraph 1 point 6	Support	Consequential amendment, as indicators also are mentioned
88	Article 2 paragraph 1 point 6	Partially support	Acceptable, but unnecessary listing. Might exclude other relevant reports.
89	Article 2 paragraph 1 point 6	Partially support	Support rapid/agile emergency updates, but the normal frequency shall be updating the Watch List every 36 months for practical reasons.
90	Article 2 paragraph 1 point 6	Not support	This is part of the WFD article 5 analysis that shall be updated every six years.
91	Article 2 paragraph 1 point 6	Support	Flexibility. Will increase costs to select 2 monitoring points for gw rather than just 1, but only marginally.
92	Article 2 paragraph 1 point 6 a new	Not support	In principle it could be relevant, but is premature. Cf. amn. 80: Scientific basis for such assessment is missing. Good ecological status of groundwater is undefined.
93	Article 2 paragraph 1 point 6 b) new	Neutral	COM to publish a report on special treatment of vulnerable etc areas and propose legislation
94	Article 2 paragraph 1 point 6 c) new	Scrutiny reservation	EPR : Extended Producer Responsibility mechanism: Premature, will require thorough examination.
95	Article 2 paragraph 1 point 6 d) new	Not support	Support Council Coreper mandate, which is already a compromise (Monitoring facility).
96	Article 2 paragraph 1 point 7	Not support	Frequency shall be in line with existing RBMP update frequency, i.e. every six years (not 4).
97	Article 2 paragraph 1 point 7	Partially support	Prefer implementing acts over delegated acts, but prefer delegation to OLP
98	Article 2 paragraph 1 point 7	Not support	Prefer implementing acts over delegated acts, but prefer delegation to OLP
99	Article 2 paragraph 1 point 7	Support	Use of BAT is welcomed.
100	Article 2 paragraph 1 point 7	Not support	Support Council Coreper mandate (references the CIS structure)

EP amendment	Reference in the text	MS position	MS comment
101	Article 2 paragraph 1 point 7	Scrutiny reservation	Inclusion of PFAS Total require guideline re. methods of analysis for monitoring (Only relevant if PFAS Total is added to the list in GWD annex 1).
102	Article 2 paragraph 1 point 7	Not support	Support the Coreper mandate: Frequency shall be in line with existing RBMP update frequency, i.e. every six years (the first time = 2 years ok)
103	Article 2 paragraph 1 point 8	Neutral	Prefer implementing acts over delegated acts, but prefer delegation to OLP. Flexible on timespan of delegation
104	Article 2 paragraph 1 point 8	Neutral	Prefer implementing acts over delegated acts, but prefer delegation to OLP. Flexible on timespan of delegation
105	Article 2 paragraph 1 point 8	Support	Correction of spelling error
106	Article 2 paragraph 1 point 8	Support	Prefer implementing acts over delegated acts, but prefer delegation to OLP.
107	Article 2 paragraph 1 point 14	Not support	Would require constant monitoring of the gwb. Not feasible (cf. amn 140).
Directive 2008/105/EC			
108	Article 3 paragraph 1 point 1a new	Not support	Unnecessary as 'priority hazardous substances' is a subset of 'priority substances'
109	Article 3 paragraph 1 point 3 point a	Not support	Support the Coreper mandate, i.e. the new subparagraph in Art. 5, para 1 (e-IEP reporting).
110	Article 3 paragraph 1 point 3 point a	Neutral	Database with emissions to be updated regularly and made available to the public, also including data in sediment and biota will increase transparency. However, the amendment could lead to noticable expansion of the monitoring program to provide the sediment and biota data.
111	Article 3 paragraph 1 point 3 point a	Not support	Support the Coreper mandate which aims at reporting only once. Lowering the admin burden.
112	Article 3 paragraph 1 point 3 point c)	Not support	Support the Coreper mandate which aims at reporting only once. Lowering the admin burden.
113	Article 3 paragraph 1 point 3 point c)	Not support	Support Coreper mandat as the use of individual pesticides may vary strongly from year to year and a 3 year average will be more representative

EP amendment	Reference in the text	MS position	MS comment
114	Article 3 paragraph 1 point 4	Neutral	COM to assess MS and the Union's measures every 2 years
115	Article 3 paragraph 1 point 4	Partially support	Support the idea in principle (cf. amn 79)
116	Article 3 paragraph 1 point 4 a new	Neutral	COM has 6 months to report to EP and Council
117	Article 3 paragraph 1 point 5	Not support	Frequency shall be in line with existing RBMP update frequency, i.e. every six years.
118	Article 3 paragraph 1 point 5	Not support	Support Coreper mandate (delegated act re. Annex II).
119	Article 3 paragraph 1 point 5	Support	Support that <i>cumulative effects</i> are included in the reintroduced Art. 16(3)(c) (first indent)
120	Article 3 paragraph 1 point 5	Scrutiny reservation	. COM to establish guidelines for analysis of monitoring of PFAS Total and adopt delegated act on EQS for it on Annex 1 by 2026
121	Article 3 paragraph 1 point 5	Scrutiny reservation	COM to establish guidelines for analysis of monitoring of Bisphenol A + B +S under the parameter Total and adopt delegated act on EQS for it on Annex 1
122	Article 3 paragraph 1 point 5	Partially support	Support the Coreper mandate. Reintroduction of article 16(5, last para) in WFD in Coreper mandate should function as a compromise.
123	Article 3 paragraph 1 point 6	Not support	Support Council Coreper mandate. Provision has been moved to annex V, 1.4.3 last para in WFD (retain 'may' rather than 'shall', extending a – d is already a compromise.
124	Article 3 paragraph 1 point 6	Not support	Adding yet another criterion on when less stringent monitoring of substances may be applied (that are no longer authorized and used)
125	Article 3 paragraph 1 point 6	Not support	Parallel monitoring with different methods adds significantly to the cost of monitoring.
126	Article 3 paragraph 1 point 7	Partially support	Flexibility towards more than 5 substances, but with an upper limit on number of substances on the list, e.g. 10 as in Coreper mandate. (Cf. amn 85 re gw.)
127	Article 3 paragraph 1 point 7	Not support	Support Council Coreper mandate (inclusion of microplastic and AMR in WL shall wait until monitoring methods and criteria are available).
128	Article 3 paragraph 1 point 7	Support	Relevant also to include indicators.

EP amendment	Reference in the text	MS position	MS comment
129	Article 3 paragraph 1 point 7	Neutral	Unnecessary, but flexible. (‘Evidence’ and ‘forecasts’ rather than ‘predictions’)
130	Article 3 paragraph 1 point 7	Partially support	Support rapid/agile emergency updates, but the general frequency should be updating the Watch List every 36 months for practical reasons (see amn. 89)
131	Article 3 paragraph 1 point 7	Not support	Higher frequency for monitoring of sub sensitive to climatic variation etc. (cf. amn. 139). Already a burden to do the required monitoring, so the aim of the proposal should be handled through planning.
132	Article 3 paragraph 1 point 7 a)	Scrutiny reservation	EPR : Extended Producer Resonsability mechanism: Premature, will need through examination.
133	Article 3 paragraph 1 point 7 b)	Not support	Support Council Coreper mandate (which is already a compromise on European Monitoring Facility).
134	Article 3 paragraph 1 point 8	Support	Metal bioavailability may be taken into account
135	Article 3 paragraph 1 point 8a new	Neutral	Flexible on timespan and revocation of delegation
136	Article 3 paragraph 1 point 8 b new	Neutral	Flexible on timespan and revocation of delegation
137	Article 3 paragraph 1 point 8 c new	Not support	Support the Coreper mandate (reference to CIS structure, cf. amn 100)
138	Article 3 paragraph 1 point 8 d new	Support	Prefer implementing acts over delegated acts, but prefer delegation to OLP. Flexible on timespan of delegation
Annexes			
139	Annex I paragraph 1 point 10 a new	Not support	Higher frequency for monitoring of sub sensitive to climatic variation etc. (cf. amn. 139). Already stipulated in the WFD that additional monitoring shall be carried out, where necessary. The purpose of the proposal should be handled through planning.
140	Annex I paragraph 1 point 18	Not support	Would require constant monitoring of the gwb. Not feasible (cf. amn. 107), and seasonal trends not relevant for gw.

EP amendment	Reference in the text	MS position	MS comment
141	Annex II paragraph 1 point 1	Not support	Not useful to classify all plastic items as main pollutants.
142	Annex III	Partially support	Flexible on entry into force earlier than the Council Coreper mandate e.g.18 months as proposed by the Commission.
143	Annex III	Not support	In principle it could be relevant, but is premature. Cf. amn. 80: Scientific basis for such assessment is missing. Good ecological status of groundwater is undefined.
144	Annex III	Not support	No scientific basis for the proposed stricter groundwater quality standard. Support Council Coreper mandate, however, to align with the DWD, the standard should be qualified as 0.10 rather than 0.1 for individual relevant pesticides and 0.50 rather than 0.5 for sum of relevant pesticides.
145	Annex III	Scrutiny reservation	Inclusion entry of PFAS Total in Annex 1 GWD.
146	Annex III	Not support	No scientific basis for the proposed stricter groundwater quality standard (threshold value 10 times stricter for gw than sw re. carbamazepin). Flexible on the value of the quality standard itself, however, prefer Commission proposal regarding value (0,25)). (cf. amn 81)
147	Annex III	Not support	Unjustified. No scientific basis for the proposed GWQS for Total Pharmaceuticals.
148	Annex III	Support	Reflects SCHEER report.
149	Annex IV	Not support	Support "consider establishing" (COM proposal).
150	Annex V paragraph 1 point 2	Not support	Support Coreper mandate. Scientific basis for the proposed stricter EQS for atrazin is unclear.
151	Annex V paragraph 1 point 2	Scrutiny reservation	Support Council Coreper mandate. Scientific basis for the proposed stricter EQS is unclear. (Glyphosat)
152	Annex V paragraph 1 point 2	Scrutiny reservation	Inclusion of Bisphenol A + B +S under the parameter Total on Annex 1, and COM to adopt delegated act on EQS for it (cf. amn 121)
153	Annex V paragraph 1 point 2	Scrutiny reservation	Inclusion of PFAS Total on Annex 1, and COM to adopt delegated act on EQS for it (cf. amn 120)
154	Annex V paragraph 1 point 2	Not support	EP proposes pharmaceutical Total 0,25 and 0,025 (entry 70c) No scientific basis for EQS.
155	Annex VI	Not support	Not useful to classify all plastic items as main pollutants (as in amendment 141).
156	Annex VI	Partially support	Prefer EP's proposal in amendment 134. Bioavailability models for metals might not be available.

ESTONIA

Table for comments – Priority substances

Table for MS comments reflecting on the amendments proposed by the EP

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- do not modify the table format by adding/removing/adjusting/merging/splitting cells and rows
- do not use active track-changes
- use the drop-down list in Column 3 to indicate the national position.
- please fill in and send the table in word format

EP amendment	Reference in the text	MS position	MS comment
1	Recital -1 new	Neutral	
2	Recital -1a new	Neutral	
3	Recital 1	Neutral	
4	Recital 1a new	Neutral	
5	Recital 1b new	Neutral	
6	Recital 1c new	Neutral	
7	Recital 1d new	Neutral	
8	Recital 1e new	Neutral	
9	Recital 1d new	Neutral	
10	Recital 1g new	Neutral	
11	Recital 1h new	Neutral	
12	Recital 1i new	Neutral	
13	Recital 1j new	Neutral	
14	Recital 1k new	Neutral	
15	Recital 2a new	Neutral	
16	Recital 3a new	Neutral	
17	Recital 3b new	Neutral	
18	Recital 4	Neutral	
19	Recital 4a	Neutral	

EP amendment	Reference in the text	MS position	MS comment
20	Recital 5	Neutral	
21	Recital 7	Neutral	
22	Recital 7a new	Neutral	
23	Recital 7b new	Neutral	
24	Recital 8	Neutral	
25	Recital 8a new	Neutral	
26	Recital 8b new	Neutral	
27	Recital 8c new	Neutral	
28	Recital 8d new	Neutral	
29	Recital 8d new	Neutral	
30	Recital 9a new	Neutral	
31	Recital 10	Neutral	
32	Recital 10a new	Neutral	
33	Recital 10b new	Neutral	
34	Recital 10c new	Neutral	
35	Recital 11	Neutral	
36	Recital 11a new	Neutral	
37	Recital 12	Neutral	
38	Recital 12a new	Neutral	
39	Recital 13a new	Neutral	
40	Recital 13b new	Neutral	
41	Recital 15	Neutral	
42	Recital 20a new	Neutral	
43	Recital 21	Neutral	
44	Recital 23	Neutral	
45	Recital 31	Neutral	
46	Recital 31new	Neutral	
47	Recital 31b new	Neutral	
48	Recital 31c new	Neutral	

EP amendment	Reference in the text	MS position	MS comment
49	Recital 32	Neutral	
50	Recital 32a new	Neutral	
51	Recital 32b new	Neutral	
52	Recital 32c new	Neutral	
53	Recital 32d new	Neutral	
54	Recital 34a new	Neutral	
55	Recital 34b new	Neutral	
Directive 2000/60/EC			
56	Article 1 paragraph 1 point 1 introductory part	Neutral	
57	Article 1 paragraph 1 point 2 point c	Neutral	EP proposal for 'Priority hazardous substances' definition is more complex and difficult to understand. Thus we prefer the wording proposed by the Council, as it is clearer and easier to understand. Nevertheless, not against the EP AM.
58	Article 1 paragraph 1 point 2 d)	Neutral	
59	Article 1 paragraph 1 point 2 d) a) new	Support	
60	Article 1 paragraph 1 point 2 d) b) new	Neutral	
61	Article 1 paragraph 1 point 3	Neutral	we support the Council's text, as it is more comprehensive and therefore more applicable. However, we don't oppose the EP amendment and can be flexible.
62	Article 1 paragraph 1 point 4 point 1	Neutral	
63	Article 1 paragraph 1 point 4 point ba	Neutral	

EP amendment	Reference in the text	MS position	MS comment
64	Article 1 paragraph 1 point 6 point a	Neutral	
65	Article 1 paragraph 1 point 6 point a) a) new	Neutral	
66	Article 1 paragraph 1 point 6 b)	Neutral	
67	Article 1 paragraph 1 point 7 a new	Neutral	we can only support EP proposal if the wording remains as proposed. Meaning, it is also important to us, that the Commission develops a guide on best practices on source control and end-of-pipe control measures.
68	Article 1 paragraph 1 point 7 b) new	Neutral	
69	Article 1 paragraph 1 point 8 a new	Neutral	
70	Article 1 paragraph 1 point 9	Neutral	
71	Article 1 paragraph 1 point 9	Neutral	
72	Article 1 paragraph 1 point 9 a	Neutral	
73	Article 1 paragraph 1 point 9 a new	Neutral	
74	Article 1 paragraph 1 point 10	Neutral	
75	Article 1 paragraph 1 point 10 a new	Neutral	
76	Article 1 paragraph	Neutral	

EP amendment	Reference in the text	MS position	MS comment
	1 point 12 point b		
77	Article 1 paragraph 1 point 18a new	Not support	do not support. Don't understand what is meant here. The amendment stipulates that the following information will also be presented when reporting River Basin Management Plans (RBMP): " <i>summary of the measures taken to digitise the monitoring aspects of the water sector</i> ".
78	Article 1 paragraph 1 point 20	Neutral	
Directive 2006/118/EC			
79	Article 2 paragraph 1 point 2	Support	
80	Article 2 paragraph 1 point 2	Support	
81	Article 2 paragraph 1 point 4 point a) a) new	Support	
82	Article 2 paragraph 1 point 4 point c)	Support	
83	Article 2 paragraph 1 point 4 point d)	Support	
84	Article 2 paragraph 1 point 4 a new	Support	
85	Article 2 paragraph 1 point 6	Not support	do not support the EP proposal, the wording of the Council is more understandable. It remains unclear what the EP's addition to proposal 85 means, which is meant under pollution indicators, because the substances on the watch list are pollutants, the proposal is not considered necessary: "In addition to the minimum number of substances or a group of substances, the watch list may also contain pollution indicators".

EP amendment	Reference in the text	MS position	MS comment
86	Article 2 paragraph 1 point 6	Neutral	the Council proposed that microplastics and selected antimicrobial resistance genes be added to the watchlist as soon as appropriate monitoring methods for them have been identified. The EP has proposed to determine the monitoring methods 18 months after the entry into force of the amendment directive. The deadline seems unrealistic, nevertheless we can be flexible, not against.
87	Article 2 paragraph 1 point 6	Neutral	
88	Article 2 paragraph 1 point 6	Support	
89	Article 2 paragraph 1 point 6	Support	
90	Article 2 paragraph 1 point 6	Not support	A completely new proposal that Member States assess every two years how water quality is affected by industrial activities related to the transformation of the energy system and inform the Commission of new risks identified so that the Commission can update the watch list and that the assessment results are made readily available to the public. If the proposal is to be implemented, it is first necessary to develop a methodology on how to assess this threat caused by the transformation of the energy system, what and how to inform. It is enough to assess the sources of load on groundwater bodies of the RBMP.
91	Article 2 paragraph 1 point 6	Support	
92	Article 2 paragraph 1 point 6 a new	Support	
93	Article 2 paragraph 1 point 6 b) new	Support	
94	Article 2 paragraph 1 point 6 c) new	Support	

EP amendment	Reference in the text	MS position	MS comment
95	Article 2 paragraph 1 point 6 d) new	Support	
96	Article 2 paragraph 1 point 7	Not support	it is proposed that the Commission review the list of pollutants provided in Annex I of the Groundwater Directive and the quality standards for these pollutants provided in said Annex, as well as the list of pollutants and indicators provided in Part B of Annex II for the first time four years after the entry into force of this Directive and every four years thereafter. We support the Council's proposal, every six years, which fits better with the schedule of RBMP-s.
97	Article 2 paragraph 1 point 7	Not support	we support the Council's proposal that the Commission is empowered to adopt delegated acts in accordance with Article 8a to amend Annex I to the Groundwater Directive to adapt it to scientific and technical progress by adding or deleting the pollutants listed in that Annex and the quality standards for those pollutants and to amend Part B to adapt with scientific and technical progress by adding pollutants or indicators for which Member States must consider establishing national threshold values. We support that the Commission takes into account the scientific reports of the European Chemicals Agency when adopting delegated acts.
98	Article 2 paragraph 1 point 7	Not support	we support the Council's proposal that the Commission is empowered to adopt delegated acts in accordance with Article 8a to amend Annex I to the Groundwater Directive to adapt it to scientific and technical progress by adding or deleting the pollutants listed in that Annex and the quality standards for those pollutants and to amend Part B to adapt with scientific and technical progress by adding pollutants or indicators for which Member States must consider establishing national threshold values. We support that the Commission takes into account the scientific reports of the European Chemicals Agency when adopting delegated acts.
99	Article 2 paragraph 1 point 7	Support	

EP amendment	Reference in the text	MS position	MS comment
100	Article 2 paragraph 1 point 7	Support	
101	Article 2 paragraph 1 point 7	Neutral	The EP's proposal that the Commission will prepare technical guidelines by January 12, 2025 at the latest, regarding the methods of analysis used for monitoring per- and polyfluorinated alkyl compounds based on the "Total PFAS" parameter, is in our view unrealistic. We are not against the EP proposal and can be flexible.
102	Article 2 paragraph 1 point 7	Support	
103	Article 2 paragraph 1 point 8	Support	
104	Article 2 paragraph 1 point 8	Support	
105	Article 2 paragraph 1 point 8	Support	
106	Article 2 paragraph 1 point 8	Support	
107	Article 2 paragraph 1 point 14	Support	
Directive 2008/105/EC			
108	Article 3 paragraph 1 point 1a new	Neutral	
109	Article 3 paragraph 1 point 3 point a	Neutral	
110	Article 3 paragraph 1 point 3 point a	Neutral	
111	Article 3 paragraph 1 point 3 point a	Not support	do not support EP amendment, as double reporting is unreasonable. We support the Council's text, because there it is justified that part of the data is reported within the framework of the PRTR anyway.

EP amendment	Reference in the text	MS position	MS comment
112	Article 3 paragraph 1 point 3 point c)	Not support	do not support EP amendment, as double reporting is unreasonable. We support the Council's text, because there it is justified that part of the data is reported within the framework of the PRTR anyway.
113	Article 3 paragraph 1 point 3 point c)	Neutral	
114	Article 3 paragraph 1 point 4	Neutral	
115	Article 3 paragraph 1 point 4	Neutral	
116	Article 3 paragraph 1 point 4 a new	Neutral	
117	Article 3 paragraph 1 point 5	Neutral	
118	Article 3 paragraph 1 point 5	Neutral	
119	Article 3 paragraph 1 point 5	Neutral	
120	Article 3 paragraph 1 point 5	Neutral	deadline 12.01.2025 seems unrealistic for the Commission to develop PFAS-total methodology. Nevertheless, we are not against the AM.
121	Article 3 paragraph 1 point 5	Neutral	
122	Article 3 paragraph 1 point 5	Neutral	
123	Article 3 paragraph 1 point 6	Neutral	
124	Article 3 paragraph 1 point 6	Not support	do not support. The directive (and the text of the Council) states that substances acting as ubiquitous PBT can be monitored less intensively under certain conditions. However, with the EP amendment, it is intended to narrow this range of substances in such a way that only

EP amendment	Reference in the text	MS position	MS comment
			prohibited and non-usable uPBT substances can be monitored less. Such narrowing is neither justified nor in accordance with the current directive and guidelines. If there is a monitoring database in the country and it is known that there are no pressure sources, and there are no problems in the water body, then the possibility of adjusting the monitoring intensity could be preserved.
125	Article 3 paragraph 1 point 6	Not support	do not support the EP proposal, because mandatory implementation of effect-based monitoring in the countries is proposed, while in the Council's text it is left optional. We believe that the implementation of effect-based monitoring should be a free choice and not an obligation.
126	Article 3 paragraph 1 point 7	Neutral	
127	Article 3 paragraph 1 point 7	Neutral	
128	Article 3 paragraph 1 point 7	Neutral	
129	Article 3 paragraph 1 point 7	Neutral	
130	Article 3 paragraph 1 point 7	Not support	not support as new requirement will be put to MS-s: <i>“Member States shall evaluate every two years the impact on water quality of industrial activities related to the energy transition and inform the Commission of newly identified threats so that it may update the watch list accordingly. The evaluation shall be easily accessible to the public.”</i> We consider that the loads mapped in the RBMP-s are sufficient, as well information and reporting is sufficient.
131	Article 3 paragraph 1 point 7	Neutral	
132	Article 3 paragraph 1 point 7 a)	Neutral	

EP amendment	Reference in the text	MS position	MS comment
133	Article 3 paragraph 1 point 7 b)	Neutral	
134	Article 3 paragraph 1 point 8	Neutral	
135	Article 3 paragraph 1 point 8a new	Neutral	
136	Article 3 paragraph 1 point 8 b new	Neutral	
137	Article 3 paragraph 1 point 8 c new	Neutral	
138	Article 3 paragraph 1 point 8 d new	Neutral	
Annexes			
139	Annex I paragraph 1 point 10 a new	Neutral	
140	Annex I paragraph 1 point 18	Neutral	
141	Annex II paragraph 1 point 1	Neutral	
142	Annex III	Neutral	Concerning the new substances in entries 3-7 of Annex I of the Groundwater Directive (PFAS amount, separately the amount of the four named PFAS, carbamazepine, sulfamethoxazole, primidone, and inappropriate metabolites of pesticides). We support the Council's proposal that the mentioned quality standards will be applied 18 months after the entry into force of this amending directive, in order to enable the achievement of a good chemical status of the water by 22 December 2033 at the latest.
143	Annex III	Neutral	
144	Annex III	Not support	do not agree with the EP's proposal to unreasonably set new threshold values of 0.05 micrograms/l and 0.25

EP amendment	Reference in the text	MS position	MS comment
			micrograms/l for individual substances and amounts of pesticides, the quality standard is sufficient. Should have a scientific base and justification to consider changes.
145	Annex III	Neutral	
146	Annex III	Not support	do not support the EP's proposal to set the quality standard for carbamazepine at 0.025 micrograms / l, which is too strict. See explanation in 144.
147	Annex III	Not support	do not support the EP's proposal to set the quality standard for pharmaceuticals residues at 0.025 micrograms/l, which is too strict. See explanation in 144.
148	Annex III	Neutral	
149	Annex IV	Neutral	
150	Annex V paragraph 1 point 2	Neutral	
151	Annex V paragraph 1 point 2	Neutral	
152	Annex V paragraph 1 point 2	Neutral	
153	Annex V paragraph 1 point 2	Neutral	
154	Annex V paragraph 1 point 2	Not support	do not support changes, because it is not specified which exact individual substances are intended.
155	Annex VI	Neutral	
156	Annex VI	Neutral	

ITALY

Table for comments – Priority substances

Table for MS comments reflecting on the amendments proposed by the EP

Notes: When completing the table, please keep the following rules:

- do not modify the table format by adding/removing/adjusting/merging/splitting cells and rows
- do not use active track-changes
- use the drop-down list in Column 3 to indicate the national position.
- please fill in and send the table in word format

EP amendment	Reference in the text	MS position	MS comment
1	Recital -1 new	Support	
2	Recital -1a new	Support	
3	Recital 1	Support	
4	Recital 1a new	Support	
5	Recital 1b new	Support	
6	Recital 1c new	Neutral	
7	Recital 1d new	Support	
8	Recital 1e new	Support	
9	Recital 1d new	Neutral	
10	Recital 1g new	Support	
11	Recital 1h new	Support	
12	Recital 1i new	Support	
13	Recital 1j new	Neutral	
14	Recital 1k new	Neutral	
15	Recital 2a new	Support	
16	Recital 3a new	Support	
17	Recital 3b new	Support	
18	Recital 4	Neutral	
19	Recital 4a	Support	

EP amendment	Reference in the text	MS position	MS comment
20	Recital 5	Neutral	acceptable
21	Recital 7	Neutral	Acceptable
22	Recital 7a new	Support	acceptable
23	Recital 7b new	Not support	
24	Recital 8	Partially support	It's considered useful to also support in the considerations the importance of defining a total PFAS parameter for both surface and groundwater as long as it is a step by step process with the preliminary definition by the European Commission of a common method for monitoring and evaluating the parameter itself. However, as in the Drinking Water Directive 2020/2184/EC, Member States may decide to use either one or both of the parameters 'PFAS Total' or 'Sum of PFAS'.
25	Recital 8a new	Support	
26	Recital 8b new	Support	
27	Recital 8c new	Not support	
28	Recital 8d new	Support	
29	Recital 8d new	Not support	Water Framework Directive and Directive 2006/118/EC do not provide for or define groundwater ecosystems, on the other hand they ensure the protection of terrestrial ecosystems connected to and dependent on groundwater. Furthermore, groundwater ecosystems are possible only in some sporadic cases, such as in karst systems, in most ground water bodies the absence of oxygen makes life difficult. it is therefore considered an excessive increase in costs without significant progress in the protection of groundwater
30	Recital 9a new	Support	
31	Recital 10	Support	
32	Recital 10a new	Scrutiny reservation	
33	Recital 10b new	Not support	
34	Recital 10c new	Support	
35	Recital 11	Support	In relation to the mixtures, we fully agree with the amendment proposed by the European Parliament

EP amendment	Reference in the text	MS position	MS comment
			on the possibility of using delegated acts of the European Commission. We agree that effects-based methods should be used as screening methods not only to detect estrogenicity effects caused by the 3 substances in Annex I of Directive 2008/105/EC, but also estrogenicity caused by other chemicals. Furthermore in future, effect-based methods must be used as screening to detect other relevant effects in water bodies, such as for example mutagenicity, neurotoxicity, oxidative stress caused by other chemical substances. For the reason a mechanism that facilitates the introduction of these methods and the derivation of effect-based trigger values is fully shareable and acceptable.”
36	Recital 11a new	Not support	It is believed that the mechanism of Directive 2006/118/EC for establishing more stringent threshold values is already applicable both for quality standards and for the setting of threshold values in Annex I point 3 and Annex II part A, so the meaning of what is expressed in the amendment regarding its further extension is not clear.
37	Recital 12	Not support	
38	Recital 12a new	Support	
39	Recital 13a new	Support	
40	Recital 13b new	Neutral	
41	Recital 15	Neutral	IT prefers Council's position
42	Recital 20a new	Not support	Vulnerable areas are already subject to additional protection measures under other directives. therefore the proposed amendment could cause an overlap of measures and related increase in costs without real benefits
43	Recital 21	Not support	we agree with the commission's position.
44	Recital 23	Not support	
45	Recital 31	Support	
46	Recital 31 new	Scrutiny reservation	
47	Recital 31b new	Neutral	
48	Recital 31c new	Support	
49	Recital 32	Neutral	

EP amendment	Reference in the text	MS position	MS comment
50	Recital 32a new	Neutral	
51	Recital 32b new	Support	We could agree that the increase in monitoring costs is a limit to the correct implementation of the objectives of the directive.
52	Recital 32c new	Support	
53	Recital 32d new	Support	We could agree that the increase in monitoring costs is a limit to the correct implementation of the objectives of the directive.
54	Recital 34a new	Support	We could agree.
55	Recital 34b new	Neutral	
Directive 2000/60/EC			
56	Article 1 paragraph 1 point 1 introductory part	Support	
57	Article 1 paragraph 1 point 2 point c	Not support	We are in line with Council's position The definition agreed by the Council already includes all the cases listed in the Parliament's definition
58	Article 1 paragraph 1 point 2 d)	Partially support	We prefer Council's position
59	Article 1 paragraph 1 point 2 d) a) new	Support	we agree with the position of parliament Corrected the update of the drinking water directive.
60	Article 1 paragraph 1 point 2 d) b) new	Not support	we do not agree with the position of parliament. Not acceptable. The emission limit value must also be defined for specific pollutants, not just for priority substances
61	Article 1 paragraph 1 point 3	Neutral	we agree with the European Parliament's position.
62	Article 1 paragraph 1 point 4 point 1	Not support	We agree with the position of the council, which refers to article 16 for the timing of the gradual elimination/reduction of pollutants
63	Article 1 paragraph 1 point 4 point ba	Neutral	
64	Article 1 paragraph	Not support	we agree with the council's position.

EP amendment	Reference in the text	MS position	MS comment
	1 point 6 point a		especially regarding the development of specific indicators to better illustrate the progress of the measures adopted
65	Article 1 paragraph 1 point 6 point a) a) new	Support	
66	Article 1 paragraph 1 point 6 b)	Not support	we agree with the council's position
67	Article 1 paragraph 1 point 7 a new	Support	
68	Article 1 paragraph 1 point 7 b) new	Support	
69	Article 1 paragraph 1 point 8 a new	Scrutiny reservation	
70	Article 1 paragraph 1 point 9	Neutral	
71	Article 1 paragraph 1 point 9	Not support	We agree with the position of the Commission
72	Article 1 paragraph 1 point 9 a	Not support	Not acceptable
73	Article 1 paragraph 1 point 9 a new	Neutral	
74	Article 1 paragraph 1 point 10	Not support	we agree with the position of the Council and of the Commission
75	Article 1 paragraph 1 point 10 a new	Not support	we agree with the position of the Council and of the Commission
76	Article 1 paragraph 1 point 12 point b	Not support	we agree with the position of the Council and of the Commission
77	Article 1 paragraph	Support	

EP amendment	Reference in the text	MS position	MS comment
	1 point 18a new		
78	Article 1 paragraph 1 point 20	Support	
Directive 2006/118/EC			
79	Article 2 paragraph 1 point 2	Not support	IT prefers the Council's position
80	Article 2 paragraph 1 point 2	Not support	The Water Framework Directive does not define or provide for the definition of the ecological status of groundwater. Furthermore, groundwater ecosystems are possible only in some sporadic cases, such as in karst systems, in most ground water bodies the absence of oxygen makes life difficult. it is therefore considered an excessive increase in costs without significant progress in the protection of groundwater
81	Article 2 paragraph 1 point 4 point a) a) new	Not support	IT prefers the Council's position
82	Article 2 paragraph 1 point 4 point c)	Not support	IT prefers the Council's position
83	Article 2 paragraph 1 point 4 point d)	Neutral	
84	Article 2 paragraph 1 point 4 a new	Neutral	
85	Article 2 paragraph 1 point 6	Not support	IT prefers the Council's position
86	Article 2 paragraph 1 point 6	Not support	IT prefers the Council's position ; to identifying a time limit for monitoring methods for microplastics and indicators of antimicrobial resistance could be counterproductive in terms of completeness and robustness of the method, considering that the study and testing of the same are still in progress ongoing
87	Article 2 paragraph 1 point 6	Neutral	

EP amendment	Reference in the text	MS position	MS comment
88	Article 2 paragraph 1 point 6	Not support	the data deriving from the characterization of the hydrographic districts pursuant to article 5 of the Water Framework Directive referred to in letter d) of the same paragraph 4 includes the analysis of the pressure and impacts on surface and groundwater including groundwater ecosystems and those dependent on groundwater
89	Article 2 paragraph 1 point 6	Not support	IT prefers the Council's position
90	Article 2 paragraph 1 point 6	Choose an option ↓	amendment appears redundant compared to what is already provided for in paragraph 4 paragraph 1 which already includes the assessment of impacts on water, furthermore the proposed period of two years, especially for groundwater, is not very significant considering the long recharge times of groundwater bodies
91	Article 2 paragraph 1 point 6	Choose an option ↓	what is proposed would increase the number of monitoring stations with an increase in the related costs, furthermore the DQA already provides for an adequate system of organization and design of the monitoring network also based on the extension of the water body
92	Article 2 paragraph 1 point 6 a new	Not support	The Water Framework Directive does not define or provide for the definition of the ecological status of groundwater. Furthermore, groundwater ecosystems are possible only in some sporadic cases, such as in karst systems, in most groundwater bodies the absence of oxygen makes life difficult. it is therefore considered an excessive increase in costs without significant progress in the protection of groundwater
93	Article 2 paragraph 1 point 6 b) new	Not support	Vulnerable areas are already subject to additional protection measures under other directives. therefore the proposed amendment could cause an overlap of measures and related increase in costs without real benefits
94	Article 2 paragraph 1 point 6 c) new	Support	It could be acceptable to help defray the costs of monitoring for new substances
95	Article 2 paragraph 1 point 6 d) new	Support	It could be acceptable to help defray the costs of monitoring for new substances
96	Article 2 paragraph 1 point 7	Not support	IT prefers the Council's position

EP amendment	Reference in the text	MS position	MS comment
97	Article 2 paragraph 1 point 7	Not support	IT prefers the Council's position
98	Article 2 paragraph 1 point 7	Not support	IT prefers the Council's position
99	Article 2 paragraph 1 point 7	Neutral	
100	Article 2 paragraph 1 point 7	Neutral	
101	Article 2 paragraph 1 point 7	Choose an option ↓	The importance of evaluating the total PFAS parameter for the purposes of environmental protection and human health is recognised; however, it is believed that it should be a gradual process that makes compliance with the quality standard mandatory as soon as scientific studies and monitoring protocols are sufficiently robust and reliable. However, as in the Drinking Water Directive 2020/2184/EC, Member States may then decide to use either one or both of the parameters 'PFAS Total' or 'Sum of PFAS'.
102	Article 2 paragraph 1 point 7	Not support	IT prefers the Council's position
103	Article 2 paragraph 1 point 8	Not support	IT prefers the Council's position
104	Article 2 paragraph 1 point 8	Choose an option ↓	IT prefers the Council's position
105	Article 2 paragraph 1 point 8	Choose an option ↓	
106	Article 2 paragraph 1 point 8	Choose an option ↓	IT prefers the Council's position
107	Article 2 paragraph 1 point 14	Scrutiny reservation	the amendment could cause an increase in costs in the planning and implementation of the measures considering that seasonal variations in groundwater bodies are difficult to register due to long recharge times
Directive 2008/105/EC			
108	Article 3 paragraph	Neutral	

EP amendment	Reference in the text	MS position	MS comment
	1 point 1a new		
109	Article 3 paragraph 1 point 3 point a	Not support	We are in line with Council's position
110	Article 3 paragraph 1 point 3 point a	Support	
111	Article 3 paragraph 1 point 3 point a	Not support	IT prefers the Council's position, aiming at avoiding redundant information transmission, further increasing costs.
112	Article 3 paragraph 1 point 3 point c)	Not support	We are in line with Council's position
113	Article 3 paragraph 1 point 3 point c)	Neutral	
114	Article 3 paragraph 1 point 4	Not support	IT prefers maintaining the 6-years frequency
115	Article 3 paragraph 1 point 4	Neutral	
116	Article 3 paragraph 1 point 4 a new	Not support	IT prefers COM position
117	Article 3 paragraph 1 point 5	Not support	IT is in line with COM proposal
118	Article 3 paragraph 1 point 5	Neutral	
119	Article 3 paragraph 1 point 5	Neutral	
120	Article 3 paragraph 1 point 5	Scrutiny reservation	IT is aware of the importance of PFAS total assessment for the health and environment protection. However, it is believed that it should be a gradual process and that the PFAS Total should be monitored as soon as scientific studies and monitoring protocols are sufficiently robust and reliable. However, as in the Drinking Water Directive 2020/2184/EC, Member States may then decide to

EP amendment	Reference in the text	MS position	MS comment
			use either one or both of the parameters 'PFAS Total' or 'Sum of PFAS'.
121	Article 3 paragraph 1 point 5	Neutral	
122	Article 3 paragraph 1 point 5	Not support	IT is in line with COM proposal
123	Article 3 paragraph 1 point 6	Not support	IT supports Council's proposal
124	Article 3 paragraph 1 point 6	Support	
125	Article 3 paragraph 1 point 6	Support	
126	Article 3 paragraph 1 point 7	Not support	IT is in line with Council's position. Limiting the number of substances to be included in the WL is essential to limit costs and increase the efficiency of the process, according to the WL ultimate scope.
127	Article 3 paragraph 1 point 7	Not support	IT is in line with Council's position Setting a strict deadline for the definition of a guideline for the monitoring of microplastics and AMR genes is not useful hampering the process leading to the definition of complete and robust methodologies.
128	Article 3 paragraph 1 point 7	Partially support	We are not in favour in inserting indicators in the WL
129	Article 3 paragraph 1 point 7	Neutral	IT prefers Council and COM proposal
130	Article 3 paragraph 1 point 7	Not support	IT supports Council's position
131	Article 3 paragraph 1 point 7	Partially support	It is necessary to define which are the substances sensitive to climate variation
132	Article 3 paragraph 1 point 7 a)	Support	It could help, once operational, supporting monitoring costs, at least a part of them.
133	Article 3 paragraph 1 point 7 b)	Support	
134	Article 3 paragraph 1 point 8	Scrutiny reservation	Overall we could agree, but the amendment is too generic, causing large variability for the application among MSs.

EP amendment	Reference in the text	MS position	MS comment
135	Article 3 paragraph 1 point 8a new	Support	
136	Article 3 paragraph 1 point 8 b new	Scrutiny reservation	
137	Article 3 paragraph 1 point 8 c new	Support	
138	Article 3 paragraph 1 point 8 d new	Scrutiny reservation	
Annexes			
139	Annex I paragraph 1 point 10 a new	Neutral	
140	Annex I paragraph 1 point 18	Neutral	
141	Annex II paragraph 1 point 1	Not support	
142	Annex III	Not support	IT is in line with Council's position.
143	Annex III	Not support	Vulnerable areas are already subject to additional protection measures under other directives. therefore the proposed amendment could cause an overlap of measures and related increase in costs without real benefits ; The Groundwater Directive already provides for the possibility of establishing more stringent threshold values in the case of connected and dependent terrestrial ecosystems.
144	Annex III	Not support	in general IT supports the Commission's position;
145	Annex III	Scrutiny reservation	the importance of evaluating the total PFAS parameter for the purposes of environmental protection and human health is recognised; however, it is believed that it should be a gradual process that makes compliance with the quality standard mandatory as soon as scientific studies and monitoring protocols are sufficiently robust and reliable –

EP amendment	Reference in the text	MS position	MS comment
			Must be explained in a note that: As in the Drinking Water Directive 2020/2184/EC, Member States may then decide to use either one or both parameters 'PFAS Total' or 'Sum of PFAS'.
146	Annex III	Scrutiny reservation	IT supports the position of the Commission which already adopts the precautionary criterion by applying a protection factor of 10 in analogy with the standard for surface waters. The data available to date on pharmaceuticals in groundwater are scarce, therefore the precautionary principle applied by the COM is considered more well-founded.
147	Annex III	Scrutiny reservation	In general IT supports the position of the Council considering the great variety and diversity of the pharmaceutical substances themselves. Furthermore, in our opinion the protection of groundwater will also be guaranteed by the evaluation of the parameter "individual active pharmaceutical substances" present in the Council's proposal in Annex II part D. In this regard, for the relative threshold value we hope for the application of a precaution factor equal to 10
148	Annex III	Scrutiny reservation	in general, IT supports the position expressed by the Council, underlining the need for the COM to list the substances, the metabolites and the related risk to be considered in the total. -
149	Annex IV	Not support	
150	Annex V paragraph 1 point 2	Not support	IT is in line with Council's position.
151	Annex V paragraph 1 point 2	Partially support	We agree with the value equal to 0.1 µg/L for inland surface water, but we do not support the stricter value equal to 0.01 µg/L for the other superficial water
152	Annex V paragraph 1 point 2	Neutral	
153	Annex V paragraph 1 point 2	Scrutiny reservation	IT is aware of the importance of PFAS total assessment for the health and environment protection. However, it is believed that it should be a gradual process and that the PFAS Total should be monitored as soon as scientific studies and monitoring protocols are sufficiently robust and reliable. Must be explained in a note that:

EP amendment	Reference in the text	MS position	MS comment
			Member States may then decide to use either one or both of the parameters 'PFAS Total' or 'Sum of PFAS'.
154	Annex V paragraph 1 point 2	Not support	
155	Annex VI	Not support	
156	Annex VI	Scrutiny reservation	Overall we could agree, but too generic, it could imply a large variability between MSs.

CYPRUS

Table for comments – Priority substances

Table for MS comments reflecting on the amendments proposed by the EP

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- please fill in and send the table in word format

EP amendment	Reference in the text	MS position	MS comment
1	Recital -1 new	Choose an option ↓	
2	Recital -1a new	Choose an option ↓	
3	Recital 1	Choose an option ↓	
4	Recital 1a new	Choose an option ↓	
5	Recital 1b new	Choose an option ↓	
6	Recital 1c new	Choose an option ↓	
7	Recital 1d new	Choose an option ↓	
8	Recital 1e new	Choose an option ↓	
9	Recital 1d new	Choose an option ↓	
10	Recital 1g new	Choose an option ↓	
11	Recital 1h new	Choose an option ↓	
12	Recital 1i new	Choose an option ↓	
13	Recital 1j new	Choose an option ↓	
14	Recital 1k new	Choose an option ↓	
15	Recital 2a new	Choose an option ↓	
16	Recital 3a new	Choose an option ↓	
17	Recital 3b new	Choose an option ↓	

EP amendment	Reference in the text	MS position	MS comment
18	Recital 4	Choose an option ↓	
19	Recital 4a	Choose an option ↓	
20	Recital 5	Choose an option ↓	
21	Recital 7	Choose an option ↓	
22	Recital 7a new	Choose an option ↓	
23	Recital 7b new	Not support	CY supports that watch list should be revised every three years and maximum number of substances should be included.
24	Recital 8	Choose an option ↓	
25	Recital 8a new	Choose an option ↓	
26	Recital 8b new	Choose an option ↓	
27	Recital 8c new	Choose an option ↓	
28	Recital 8d new	Choose an option ↓	
29	Recital 8d new	Choose an option ↓	
30	Recital 9a new	Choose an option ↓	
31	Recital 10	Choose an option ↓	
32	Recital 10a new	Choose an option ↓	
33	Recital 10b new	Choose an option ↓	
34	Recital 10c new	Choose an option ↓	
35	Recital 11	Not support	CY supports recital 11 as referred in general approach. The monitoring of estrogenic substances using effect-based monitoring methods should be on a voluntary basis. This is red line for CY
36	Recital 11a new	Not support	
37	Recital 12	Not support	CY supports the deletion of recital 12 as proposed in general approach. List of pollutants should be revised by the ordinary legal procedure
38	Recital 12a new	Choose an option ↓	
39	Recital 13a new	Choose an option ↓	

EP amendment	Reference in the text	MS position	MS comment
40	Recital 13b new	Choose an option ↓	
41	Recital 15	Choose an option ↓	
42	Recital 20a new	Choose an option ↓	
43	Recital 21	Choose an option ↓	
44	Recital 23	Choose an option ↓	
45	Recital 31	Choose an option ↓	
46	Recital 31new	Choose an option ↓	
47	Recital 31b new	Choose an option ↓	
48	Recital 31c new	Choose an option ↓	
49	Recital 32	Choose an option ↓	
50	Recital 32a new	Choose an option ↓	
51	Recital 32b new	Not support	CY doesn't support amendment 51 and especially the use of term "producer" and not "manufacturer". This added cost, might ultimately be transferred to European farmers.
52	Recital 32c new	Support	CY supports the establishment of a joint monitoring facility although we have concerns regarding the cost of analysis shipping and preservation of samples (especially for MS like CY that are far away).
53	Recital 32d new	Choose an option ↓	
54	Recital 34a new	Choose an option ↓	
55	Recital 34b new	Choose an option ↓	
Directive 2000/60/EC			
56	Article 1 paragraph 1 point 1 introductory part	Choose an option ↓	
57	Article 1 paragraph 1 point 2 point c	Neutral	CY prefers definition of "priority hazardous substances" as proposed in General approach

EP amendment	Reference in the text	MS position	MS comment
58	Article 1 paragraph 1 point 2 d)	Choose an option ↓	
59	Article 1 paragraph 1 point 2 d) a) new	Support	
60	Article 1 paragraph 1 point 2 d) b) new	Choose an option ↓	
61	Article 1 paragraph 1 point 3	Choose an option ↓	
62	Article 1 paragraph 1 point 4 point 1	Choose an option ↓	
63	Article 1 paragraph 1 point 4 point ba	Choose an option ↓	
64	Article 1 paragraph 1 point 6 point a	Choose an option ↓	
65	Article 1 paragraph 1 point 6 point a) a) new	Choose an option ↓	
66	Article 1 paragraph 1 point 6 b)	Not support	CY supports the removal of status reporting in Article 8(4) of Directive 2000/60/EK. This is red line for CY
67	Article 1 paragraph 1 point 7 a new	Choose an option ↓	
68	Article 1 paragraph 1 point 7 b) new	Choose an option ↓	
69	Article 1 paragraph 1 point 8 a new	Choose an option ↓	

EP amendment	Reference in the text	MS position	MS comment
70	Article 1 paragraph 1 point 9	Choose an option ↓	
71	Article 1 paragraph 1 point 9	Choose an option ↓	
72	Article 1 paragraph 1 point 9 a	Choose an option ↓	
73	Article 1 paragraph 1 point 9 a new	Choose an option ↓	
74	Article 1 paragraph 1 point 10	Choose an option ↓	
75	Article 1 paragraph 1 point 10 a new	Choose an option ↓	
76	Article 1 paragraph 1 point 12 point b	Choose an option ↓	
77	Article 1 paragraph 1 point 18a new	Choose an option ↓	
78	Article 1 paragraph 1 point 20	Choose an option ↓	
Directive 2006/118/EC			
79	Article 2 paragraph 1 point 2	Choose an option ↓	
80	Article 2 paragraph 1 point 2	Not support	CY doesn't support amendment 80 regarding the inclusion of criteria for assessing the good ecological status of groundwater. The amendment is a red line for CY
81	Article 2 paragraph 1 point 4 point a) new	Not support	CY doesn't support amendment 81 and the connection of surface EQS with GW threshold values. The amendment is a red line for CY.
82	Article 2 paragraph 1 point 4 point c)	Choose an option ↓	

EP amendment	Reference in the text	MS position	MS comment
83	Article 2 paragraph 1 point 4 point d)	Choose an option ↓	
84	Article 2 paragraph 1 point 4 a new	Choose an option ↓	
85	Article 2 paragraph 1 point 6	Not support	CY doesn't support amendment 85 regarding number of substances watch list shall contain.
86	Article 2 paragraph 1 point 6	Not support	CY doesn't support the inclusion of the timeframe in amendment 86.
87	Article 2 paragraph 1 point 6	Choose an option ↓	
88	Article 2 paragraph 1 point 6	Choose an option ↓	
89	Article 2 paragraph 1 point 6	Not support	CY doesn't support amendment 89. The watch list should be amended every 36 months.
90	Article 2 paragraph 1 point 6	Not support	
91	Article 2 paragraph 1 point 6	Choose an option ↓	
92	Article 2 paragraph 1 point 6 a new	Not support	CY doesn't support the inclusion of criteria for assessing the good ecological status of groundwater.
93	Article 2 paragraph 1 point 6 b) new	Not support	The obligations of the member states are not clear.
94	Article 2 paragraph 1 point 6 c) new	Not support	CY doesn't support amendment 94 and especially the use of term "producer" and not "manufacturer". This added cost, might ultimately be transferred to European farmers.
95	Article 2 paragraph 1 point 6 d) new	Support	CY supports the establishment of a joint monitoring facility although we have concerns regarding the cost of analysis shipping and preservation of samples (especially for MS like CY that are far away).
96	Article 2 paragraph 1 point 7	Not support	CY supports the revision of substances by the ordinary legal procedure

EP amendment	Reference in the text	MS position	MS comment
97	Article 2 paragraph 1 point 7	Not support	CY supports the revision of substances by the ordinary legal procedure
98	Article 2 paragraph 1 point 7	Not support	CY supports the revision of substances by the ordinary legal procedure
99	Article 2 paragraph 1 point 7	Choose an option ↓	
100	Article 2 paragraph 1 point 7	Choose an option ↓	
101	Article 2 paragraph 1 point 7	Not support	CY doesn't support the second and the third sentence of the amendment. CY supports that EQS should be set and revised by the ordinary legal procedure.
102	Article 2 paragraph 1 point 7	Choose an option ↓	
103	Article 2 paragraph 1 point 8	Not support	CY supports the revision of substances by the ordinary legal procedure
104	Article 2 paragraph 1 point 8	Not support	CY supports the revision of substances by the ordinary legal procedure
105	Article 2 paragraph 1 point 8	Not support	CY supports the revision of substances by the ordinary legal procedure
106	Article 2 paragraph 1 point 8	Not support	CY supports the revision of substances by the ordinary legal procedure
107	Article 2 paragraph 1 point 14	Not support	CY doesn't support amendment 107 and the inclusion of seasonal upward trends starting point for implementing measures to reverse significant and sustained upward trends
Directive 2008/105/EC			
108	Article 3 paragraph 1 point 1a new	Neutral	
109	Article 3 paragraph 1 point 3 point a	Choose an option ↓	
110	Article 3 paragraph	Choose an option ↓	

EP amendment	Reference in the text	MS position	MS comment
	1 point 3 point a		
111	Article 3 paragraph 1 point 3 point a	Choose an option ↓	
112	Article 3 paragraph 1 point 3 point c)	Choose an option ↓	
113	Article 3 paragraph 1 point 3 point c)	Choose an option ↓	
114	Article 3 paragraph 1 point 4	Choose an option ↓	
115	Article 3 paragraph 1 point 4	Choose an option ↓	
116	Article 3 paragraph 1 point 4 a new	Choose an option ↓	
117	Article 3 paragraph 1 point 5	Not support	CY supports the revision of substances by the ordinary legal procedure
118	Article 3 paragraph 1 point 5	Not support	CY supports the revision of substances by the ordinary legal procedure
119	Article 3 paragraph 1 point 5	Choose an option ↓	
120	Article 3 paragraph 1 point 5	Not support	CY doesn't support the second sentence of the amendment. CY supports that EQS should be set and revised by the ordinary legal procedure.
121	Article 3 paragraph 1 point 5	Not support	CY supports that EQS should be set and revised by the ordinary legal procedure
122	Article 3 paragraph 1 point 5	Not support	CY supports the revision of substances by the ordinary legal procedure
123	Article 3 paragraph 1 point 6	Choose an option ↓	
124	Article 3 paragraph 1 point 6	Choose an option ↓	

EP amendment	Reference in the text	MS position	MS comment
125	Article 3 paragraph 1 point 6	Not support	The monitoring of estrogenic substances using effect-based monitoring methods should be on a voluntary basis. This is red line for CY
126	Article 3 paragraph 1 point 7	Not support	CY doesn't support amendment 126 regarding number of substances watch list shall contain.
127	Article 3 paragraph 1 point 7	Not support	CY doesn't support the inclusion of the timeframe in amendment 127.
128	Article 3 paragraph 1 point 7	Choose an option ↓	
129	Article 3 paragraph 1 point 7	Neutral	
130	Article 3 paragraph 1 point 7	Not support	CY doesn't support amendment 130. The watch list should be amended every 36 months. CY doesn't support that: "Member States shall evaluate every two years the impact on water quality of industrial activities related to the energy transition and inform the Commission of newly identified threats so that it may update the watch list accordingly"
131	Article 3 paragraph 1 point 7	Choose an option ↓	
132	Article 3 paragraph 1 point 7 a)	Not support	CY doesn't support amendment 132 and especially the use of term "producer" and not "manufacturer". This added cost, might ultimately be transferred to European farmers
133	Article 3 paragraph 1 point 7 b)	Support	CY supports the establishment of a joint monitoring facility although we have concerns regarding the cost of analysis shipping and preservation of samples (especially for MS like CY that are far away).
134	Article 3 paragraph 1 point 8	Choose an option ↓	
135	Article 3 paragraph 1 point 8a new	Choose an option ↓	
136	Article 3 paragraph 1 point 8 b new	Choose an option ↓	

EP amendment	Reference in the text	MS position	MS comment
137	Article 3 paragraph 1 point 8 c new	Choose an option ↓	
138	Article 3 paragraph 1 point 8 d new	Choose an option ↓	
Annexes			
139	Annex I paragraph 1 point 10 a new	Choose an option ↓	
140	Annex I paragraph 1 point 18	Choose an option ↓	
141	Annex II paragraph 1 point 1	Choose an option ↓	
142	Annex III	Not support	CY supports deletion of “note 1” as proposed in General approach.
143	Annex III	Choose an option ↓	
144	Annex III	Choose an option ↓	
145	Annex III	Not support	CY supports that EQS should be set and revised by the ordinary legal procedure.
146	Annex III	Choose an option ↓	
147	Annex III	Choose an option ↓	
148	Annex III	Choose an option ↓	
149	Annex IV	Not support	
150	Annex V paragraph 1 point 2	Choose an option ↓	
151	Annex V paragraph 1 point 2	Choose an option ↓	
152	Annex V paragraph 1 point 2	Not support	CY supports that EQS should be set and revised by the ordinary legal procedure.
153	Annex V paragraph 1 point 2	Not support	CY supports that EQS should be set and revised by the ordinary legal procedure.

EP amendment	Reference in the text	MS position	MS comment
154	Annex V paragraph 1 point 2	Not support	CY doesn't support amendment 154 (introduction of total pharmaceuticals) since the number and kind of selected substances will be different and not comparable between MS.
155	Annex VI	Choose an option ↓	
156	Annex VI	Choose an option ↓	

LATVIA

Table for comments – Priority substances

Table for MS comments reflecting on the amendments proposed by the EP

Notes: When completing the table, please keep the following rules:

- do not modify the table format by adding/removing/adjusting/merging/splitting cells and rows
- do not use active track-changes
- use the drop-down list in Column 3 to indicate the national position.
- please fill in and send the table in word format

EP amendment	Reference in the text	MS position	MS comment
1	Recital -1 new	Neutral	This is a Recital 1 from the Directive 2000/60/EC. What's the point of duplicating it?
2	Recital -1a new	Neutral	
3	Recital 1	Neutral	
4	Recital 1a new	Neutral	
5	Recital 1b new	Neutral	
6	Recital 1c new	Neutral	
7	Recital 1d new	Neutral	
8	Recital 1e new	Neutral	
9	Recital 1d new	Neutral	
10	Recital 1g new	Neutral	
11	Recital 1h new	Neutral	
12	Recital 1i new	Support	
13	Recital 1j new	Not support	
14	Recital 1k new	Not support	
15	Recital 2a new	Not support	
16	Recital 3a new	Support	
17	Recital 3b new	Support	
18	Recital 4	Not support	

EP amendment	Reference in the text	MS position	MS comment
19	Recital 4a	Neutral	
20	Recital 5	Neutral	
21	Recital 7	Neutral	
22	Recital 7a new	Support	
23	Recital 7b new	Not support	
24	Recital 8	Not support	
25	Recital 8a new	Support	
26	Recital 8b new	Not support	
27	Recital 8c new	Not support	
28	Recital 8d new	Not support	
29	Recital 8d new	Not support	
30	Recital 9a new	Neutral	
31	Recital 10	Neutral	
32	Recital 10a new	Not support	
33	Recital 10b new	Not support	
34	Recital 10c new	Support	
35	Recital 11	Neutral	
36	Recital 11a new	Neutral	
37	Recital 12	Not support	
38	Recital 12a new	Neutral	
39	Recital 13a new	Support	
40	Recital 13b new	Neutral	
41	Recital 15	Not support	
42	Recital 20a new	Scrutiny reservation	
43	Recital 21	Neutral	
44	Recital 23	Not support	
45	Recital 31	Neutral	
46	Recital 31new	Not support	
47	Recital 31b new	Not support	

EP amendment	Reference in the text	MS position	MS comment
48	Recital 31c new	Not support	
49	Recital 32	Not support	
50	Recital 32a new	Neutral	
51	Recital 32b new	Not support	
52	Recital 32c new	Neutral	
53	Recital 32d new	Partially support	
54	Recital 34a new	Neutral	
55	Recital 34b new	Neutral	
Directive 2000/60/EC			
56	Article 1 paragraph 1 point 1 introductory part	Neutral	
57	Article 1 paragraph 1 point 2 point c	Not support	Proposed definition is too complicated and therefore impractical.
58	Article 1 paragraph 1 point 2 d)	Neutral	
59	Article 1 paragraph 1 point 2 d) a) new	Support	
60	Article 1 paragraph 1 point 2 d) b) new	Neutral	
61	Article 1 paragraph 1 point 3	Not support	Amendment does not take into account already existing cooperation between the Member States.
62	Article 1 paragraph 1 point 4 point 1	Not support	
63	Article 1 paragraph 1 point 4 point ba	Not support	Amendment overlaps with Article 10 of Directive 2000/60/EC

EP amendment	Reference in the text	MS position	MS comment
64	Article 1 paragraph 1 point 6 point a	Not support	
65	Article 1 paragraph 1 point 6 point a) new	Neutral	In such a comprehensive assessment, it would be necessary to include a summary of indicators and substances, including priority and dangerous substances, which could be monitored with such online pollution monitoring systems.
66	Article 1 paragraph 1 point 6 b)	Not support	We are strongly against the request to assess and report status annually.
67	Article 1 paragraph 1 point 7 a new	Neutral	
68	Article 1 paragraph 1 point 7 b) new	Neutral	
69	Article 1 paragraph 1 point 8 a new	Neutral	
70	Article 1 paragraph 1 point 9	Neutral	
71	Article 1 paragraph 1 point 9	Not support	
72	Article 1 paragraph 1 point 9 a	Not support	According to Directive 2000/60/EC, the approval of river basin management plans is within the competence of the Member States themselves, not the Commission
73	Article 1 paragraph 1 point 9 a new	Not support	We are strongly against it as such Article was not in the original proposal and therefore was not discussed in the Council. Besides, COM has repeatedly emphasized, that the amendments to Directive 2000/60/EC only affect the lists of priority and dangerous substances and the related conditions. We believe that it is not appropriate to include such amendment at this stage.
74	Article 1 paragraph 1 point 10	Not support	
75	Article 1 paragraph 1 point 10 a new	Not support	

EP amendment	Reference in the text	MS position	MS comment
76	Article 1 paragraph 1 point 12 point b	Not support	
77	Article 1 paragraph 1 point 18a new	Not support	
78	Article 1 paragraph 1 point 20	Support	
Directive 2006/118/EC			
79	Article 2 paragraph 1 point 2	Neutral	
80	Article 2 paragraph 1 point 2	Not support	
81	Article 2 paragraph 1 point 4 point a) a) new	Not support	
82	Article 2 paragraph 1 point 4 point c)	Neutral	
83	Article 2 paragraph 1 point 4 point d)	Neutral	
84	Article 2 paragraph 1 point 4 a new	Neutral	
85	Article 2 paragraph 1 point 6	Not support	We strongly oppose the proposal to limit the minimum (rather than the maximum, as in the Council version) number of substances to be included in the list, because in essence it allows for an infinite number of substances to be included in the list, which makes it difficult to plan monitoring and the necessary funding. We consider it essential to include the text approved by the Council: "The total number of individual compounds and methods shall not entail excessive costs for the competent authorities." We can accept the other changes suggested in this paragraph.

EP amendment	Reference in the text	MS position	MS comment
86	Article 2 paragraph 1 point 6	Not support	
87	Article 2 paragraph 1 point 6	Neutral	
88	Article 2 paragraph 1 point 6	Neutral	
89	Article 2 paragraph 1 point 6	Neutral	
90	Article 2 paragraph 1 point 6	Not support	
91	Article 2 paragraph 1 point 6	Not support	We strongly oppose, as this proposal increases the volume and cost of monitoring
92	Article 2 paragraph 1 point 6 a new	Scrutiny reservation	
93	Article 2 paragraph 1 point 6 b) new	Scrutiny reservation	
94	Article 2 paragraph 1 point 6 c) new	Scrutiny reservation	
95	Article 2 paragraph 1 point 6 d) new	Partially support	We believe that it is reasonable to start with an exploration how such a joint monitoring facility could be established and operated, as proposed in the Council mandate.
96	Article 2 paragraph 1 point 7	Not support	
97	Article 2 paragraph 1 point 7	Not support	
98	Article 2 paragraph 1 point 7	Neutral	
99	Article 2 paragraph 1 point 7	Neutral	
100	Article 2 paragraph 1 point 7	Neutral	

EP amendment	Reference in the text	MS position	MS comment
101	Article 2 paragraph 1 point 7	Not support	
102	Article 2 paragraph 1 point 7	Neutral	
103	Article 2 paragraph 1 point 8	Not support	
104	Article 2 paragraph 1 point 8	Not support	
105	Article 2 paragraph 1 point 8	Neutral	
106	Article 2 paragraph 1 point 8	Not support	
107	Article 2 paragraph 1 point 14	Scrutiny reservation	
Directive 2008/105/EC			
108	Article 3 paragraph 1 point 1a new	Neutral	
109	Article 3 paragraph 1 point 3 point a	Neutral	
110	Article 3 paragraph 1 point 3 point a	Not support	
111	Article 3 paragraph 1 point 3 point a	Not support	
112	Article 3 paragraph 1 point 3 point c)	Neutral	
113	Article 3 paragraph 1 point 3 point c)	Not support	
114	Article 3 paragraph 1 point 4	Neutral	

EP amendment	Reference in the text	MS position	MS comment
115	Article 3 paragraph 1 point 4	Neutral	
116	Article 3 paragraph 1 point 4 a new	Neutral	
117	Article 3 paragraph 1 point 5	Not support	
118	Article 3 paragraph 1 point 5	Not support	
119	Article 3 paragraph 1 point 5	Neutral	
120	Article 3 paragraph 1 point 5	Not support	
121	Article 3 paragraph 1 point 5	Not support	
122	Article 3 paragraph 1 point 5	Not support	
123	Article 3 paragraph 1 point 6	Not support	
124	Article 3 paragraph 1 point 6	Not support	
125	Article 3 paragraph 1 point 6	Not support	
126	Article 3 paragraph 1 point 7	Not support	We strongly oppose the proposal to limit the minimum (rather than the maximum, as in the Council version) number of substances to be included in the list, because in essence it allows for an infinite number of substances to be included in the list, which makes it difficult to plan monitoring and the necessary funding.
127	Article 3 paragraph 1 point 7	Partially support	WE believe that the following text from the Council mandate shall be included: "provided that harmonized and reliable monitoring methods and evaluation standards not entailing excessive costs and adequate and scientifically agreed criteria for their assessment are available."
128	Article 3 paragraph 1 point 7	Neutral	

EP amendment	Reference in the text	MS position	MS comment
129	Article 3 paragraph 1 point 7	Neutral	
130	Article 3 paragraph 1 point 7	Not support	
131	Article 3 paragraph 1 point 7	Neutral	
132	Article 3 paragraph 1 point 7 a)	Not support	
133	Article 3 paragraph 1 point 7 b)	Partially support	We believe that it is reasonable to start with an exploration how such a joint monitoring facility could be established and operated, as proposed in the Council mandate.
134	Article 3 paragraph 1 point 8	Neutral	
135	Article 3 paragraph 1 point 8a new	Not support	
136	Article 3 paragraph 1 point 8 b new	Not support	
137	Article 3 paragraph 1 point 8 c new	Neutral	
138	Article 3 paragraph 1 point 8 d new	Not support	
Annexes			
139	Annex I paragraph 1 point 10 a new	Not support	We strongly oppose this proposal.
140	Annex I paragraph 1 point 18	Not support	
141	Annex II paragraph 1 point 1	Not support	
142	Annex III	Not support	
143	Annex III	Scrutiny reservation	

EP amendment	Reference in the text	MS position	MS comment
144	Annex III	Not support	
145	Annex III	Not support	We support conditions on PFAS included in the Council mandate.
146	Annex III	Not support	
147	Annex III	Not support	
148	Annex III	Not support	
149	Annex IV	Not support	
150	Annex V paragraph 1 point 2	Not support	
151	Annex V paragraph 1 point 2	Partially support	
152	Annex V paragraph 1 point 2	Not support	
153	Annex V paragraph 1 point 2	Not support	
154	Annex V paragraph 1 point 2	Not support	
155	Annex VI	Not support	
156	Annex VI	Neutral	

THE NETHERLANDS

Table for comments – Priority substances

Table for MS comments reflecting on the amendments proposed by the EP

NL POSITION ON EP AMENDMENTS

We thank the Presidency for the possibility to send comments on the EP amendments. We would like to emphasize that the Netherlands supports the ambition to further protect and improve the quality of surface water and groundwater and the aim to improve coherence across European legislation on chemicals. Earlier this year we together reached a positive compromise. One important issue from this compromise for the Netherlands is the solution with regard to the issues we have regarding ‘deterioration’ in relation to relocation of water and sediment. The Netherlands prefers to stay as close as possible to this compromise.

Enclosed you’ll find our position and comments in the table on the EP Amendments.

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- please fill in and send the table in word format

EP amendment	Reference in the text	MS position	MS comment
1	Recital -1 new	Neutral	
2	Recital -1a new	Neutral	
3	Recital 1	Neutral	
4	Recital 1a new	Neutral	
5	Recital 1b new	Neutral	
6	Recital 1c new	Not support	Superfluous.
7	Recital 1d new	Not support	Superfluous.
8	Recital 1e new	Partially support	NL does not support the emphasis on agriculture.
9	Recital 1d new	Not support	

EP amendment	Reference in the text	MS position	MS comment
10	Recital 1g new	Not support	Water is important for several uses and activities.
11	Recital 1h new	Not support	
12	Recital 1i new	Not support	Superfluous because already part of the WFD.
13	Recital 1j new	Not support	Object to include what a specific sector has accomplished
14	Recital 1k new	Not support	
15	Recital 2a new	Not support	Already part of the WFD.
16	Recital 3a new	Neutral	
17	Recital 3b new	Not support	Should not be part of WFD
18	Recital 4	Not support	
19	Recital 4a	Not support	Compromise text (11383/24) is preferred.
20	Recital 5	Neutral	
21	Recital 7	Scrutiny reservation	
22	Recital 7a new	Neutral	
23	Recital 7b new	Not support	Higher monitoring costs and more administrative burden expected.
24	Recital 8	Not support	Object to adopt QS by delegated acts.
25	Recital 8a new	Not support	Not part of the proposal. Authorization of glyphosate is regulated via 1107-2009.
26	Recital 8b new	Not support	
27	Recital 8c new	Scrutiny reservation	How (via what procedure) will the Commission review the QS for pesticides? How does this relate to the regulations on the authorisation of pesticides (1107/2009 and 528/2012)
28	Recital 8d new	Neutral	
29	Recital 8d new	Not support	See amendment 81.
30	Recital 9a new	Not support	
31	Recital 10	Not support	Not to be addressed in this proposal. See One Health approach.
32	Recital 10a new	Not support	Not to be addressed in this proposal. See One Health approach.
33	Recital 10b new	Neutral	
34	Recital 10c new	Partially support	NL does not support the emphasis on one sector.
35	Recital 11	Not support	

EP amendment	Reference in the text	MS position	MS comment
36	Recital 11a new	Neutral	Superfluous. Already provided for with Annex 1, par 3, of Directive 2006/118.
37	Recital 12	Not support	
38	Recital 12a new	Neutral	
39	Recital 13a new	Not support	
40	Recital 13b new	Neutral	
41	Recital 15	Not support	
42	Recital 20a new	Not support	
43	Recital 21	Neutral	
44	Recital 23	Not support	
45	Recital 31	Neutral	
46	Recital 31new	Not support	Difficult to implement. High administrative burden.
47	Recital 31b new	Neutral	
48	Recital 31c new	Neutral	
49	Recital 32	Neutral	
50	Recital 32a new	Neutral	
51	Recital 32b new	Not support	Difficult to implement. High administrative burden.
52	Recital 32c new	Neutral	
53	Recital 32d new	Not support	At discretion of Member States
54	Recital 34a new	Not support	
55	Recital 34b new	Not support	
Directive 2000/60/EC			
56	Article 1 paragraph 1 point 1 introductory part	Neutral	
57	Article 1 paragraph 1 point 2 point c	Neutral	
58	Article 1 paragraph 1 point 2 d)	Not support	

EP amendment	Reference in the text	MS position	MS comment
59	Article 1 paragraph 1 point 2 d) a) new	Support	
60	Article 1 paragraph 1 point 2 d) b) new	Neutral	
61	Article 1 paragraph 1 point 3	Not support	Superfluous.
62	Article 1 paragraph 1 point 4 point 1	Not support	
63	Article 1 paragraph 1 point 4 point ba	Not support	Strictest QS already applies.
64	Article 1 paragraph 1 point 6 point a	Not support	
65	Article 1 paragraph 1 point 6 point a) a) new	Neutral	Not clear, explanation needed.
66	Article 1 paragraph 1 point 6 b)	Not support	Not clear, explanation needed.
67	Article 1 paragraph 1 point 7 a new	Not support	Difficult to implement. High administrative burden.
68	Article 1 paragraph 1 point 7 b) new	Not support	Superfluous.
69	Article 1 paragraph 1 point 8 a new	Neutral	
70	Article 1 paragraph 1 point 9	Neutral	
71	Article 1 paragraph 1 point 9	Neutral	

EP amendment	Reference in the text	MS position	MS comment
72	Article 1 paragraph 1 point 9 a	Scrutiny reservation	
73	Article 1 paragraph 1 point 9 a new	Neutral	
74	Article 1 paragraph 1 point 10	Neutral	
75	Article 1 paragraph 1 point 10 a new	Neutral	
76	Article 1 paragraph 1 point 12 point b	Neutral	
77	Article 1 paragraph 1 point 18a new	Neutral	
78	Article 1 paragraph 1 point 20	Neutral	
Directive 2006/118/EC			
79	Article 2 paragraph 1 point 2	Neutral	
80	Article 2 paragraph 1 point 2	Not support	Complex.
81	Article 2 paragraph 1 point 4 point a) a) new	Not support	A QS for groundwater 10 times lower than the QS for surface water by default is too strict, unfeasible and not scientifically based. See also amendment 29.
82	Article 2 paragraph 1 point 4 point c)	Neutral	
83	Article 2 paragraph 1 point 4 point d)	Scrutiny reservation	Not clear what this means.
84	Article 2 paragraph 1 point 4 a new	Neutral	

EP amendment	Reference in the text	MS position	MS comment
85	Article 2 paragraph 1 point 6	Not support	Compromise text (11383/24) is preferred.
86	Article 2 paragraph 1 point 6	Neutral	Compromise text (11383/24) is preferred.
87	Article 2 paragraph 1 point 6	Neutral	
88	Article 2 paragraph 1 point 6	Neutral	
89	Article 2 paragraph 1 point 6	Neutral	
90	Article 2 paragraph 1 point 6	Not support	Not clear why evaluation specifically for energy transition is needed.
91	Article 2 paragraph 1 point 6	Neutral	
92	Article 2 paragraph 1 point 6 a new	Not support	Complex.
93	Article 2 paragraph 1 point 6 b) new	Neutral	
94	Article 2 paragraph 1 point 6 c) new	Not support	Difficult to implement. High administrative burden.
95	Article 2 paragraph 1 point 6 d) new	Neutral	
96	Article 2 paragraph 1 point 7	Not support	4 years is too short. 6 years is preferred.
97	Article 2 paragraph 1 point 7	Partially support	Object to review of Annex II of Directive 2006/118 by delegated acts.
98	Article 2 paragraph 1 point 7	Not support	Object to review of Annex I or II of Directive 2006/118 by delegated acts.
99	Article 2 paragraph 1 point 7	Neutral	

EP amendment	Reference in the text	MS position	MS comment
100	Article 2 paragraph 1 point 7	Neutral	Superfluous.
101	Article 2 paragraph 1 point 7	Not support	Object to establishing QS by delegated acts.
102	Article 2 paragraph 1 point 7	Not support	Object to reference to paragraph 2 and 3. Preference to compromise text (11383/24).
103	Article 2 paragraph 1 point 8	Not support	Object to review Annex I or II by delegated acts.
104	Article 2 paragraph 1 point 8	Not support	Object to review Annex I or II by delegated acts.
105	Article 2 paragraph 1 point 8	Neutral	Not relevant for NL.
106	Article 2 paragraph 1 point 8	Not support	Object to review Annex I or II by delegated acts.
107	Article 2 paragraph 1 point 14	Not support	Upwards trends are now identified over a period of several years. What method is proposed to include seasonal upward trends?
Directive 2008/105/EC			
108	Article 3 paragraph 1 point 1a new	Neutral	
109	Article 3 paragraph 1 point 3 point a	Neutral	Compromise text (11383/24) is preferred.
110	Article 3 paragraph 1 point 3 point a	Neutral	
111	Article 3 paragraph 1 point 3 point a	Neutral	
112	Article 3 paragraph 1 point 3 point c)	Neutral	Compromise text (11383/24) is preferred.
113	Article 3 paragraph 1 point 3 point c)	Neutral	

EP amendment	Reference in the text	MS position	MS comment
114	Article 3 paragraph 1 point 4	Neutral	
115	Article 3 paragraph 1 point 4	Neutral	
116	Article 3 paragraph 1 point 4 a new	Neutral	
117	Article 3 paragraph 1 point 5	Neutral	Compromise text (11383/24) is preferred
118	Article 3 paragraph 1 point 5	Neutral	Compromise text (11383/24) is preferred
119	Article 3 paragraph 1 point 5	Neutral	
120	Article 3 paragraph 1 point 5	Not support	Total PFAS is not acceptable for NL because this would not address the risks posed by PFAS properly. In addition it would enlarge our current issues with activities that only relocate existing pollution. NL prefers Commission proposal which is endorsed by SCHEER.
121	Article 3 paragraph 1 point 5	Neutral	NL suggests the Commission to start an expert group to research the possibilities for a technical guideline. Regrettable substitution should be avoided.
122	Article 3 paragraph 1 point 5	Neutral	Compromise text (11383/24) is preferred.
123	Article 3 paragraph 1 point 6	Neutral	Compromise text (11383/24) is preferred.
124	Article 3 paragraph 1 point 6	Neutral	
125	Article 3 paragraph 1 point 6	Neutral	
126	Article 3 paragraph 1 point 7	Neutral	Compromise text (11383/24) is preferred.
127	Article 3 paragraph 1 point 7	Neutral	Compromise text (11383/24) is preferred.
128	Article 3 paragraph 1 point 7	Support	

EP amendment	Reference in the text	MS position	MS comment
129	Article 3 paragraph 1 point 7	Neutral	
130	Article 3 paragraph 1 point 7	Not support	Difficult to implement. High administrative burden.
131	Article 3 paragraph 1 point 7	Neutral	Compromise text (11383/24) is preferred.
132	Article 3 paragraph 1 point 7 a)	Scrutiny reservation	
133	Article 3 paragraph 1 point 7 b)	Neutral	
134	Article 3 paragraph 1 point 8	Support	
135	Article 3 paragraph 1 point 8a new	Neutral	Compromise text (11383/24) is preferred.
136	Article 3 paragraph 1 point 8 b new	Neutral	Compromise text (11383/24) is preferred.
137	Article 3 paragraph 1 point 8 c new	Neutral	Compromise text (11383/24) is preferred.
138	Article 3 paragraph 1 point 8 d new	Neutral	
Annexes			
139	Annex I paragraph 1 point 10 a new	Neutral	
140	Annex I paragraph 1 point 18	Neutral	
141	Annex II paragraph 1 point 1	Neutral	
142	Annex III	Not support	NL strongly supports support compromise text (11383/24), article 3 of 2006/118.
143	Annex III	Not support	Superfluous. Already provided for with Annex 1, par 3, of Directive 2006/118.

EP amendment	Reference in the text	MS position	MS comment
144	Annex III	Scrutiny reservation	Raises a number of questions. Halve the QS is not scientifically based. It is unclear how the proposed QS relate to the criteria for the authorization of pesticides. With respect to the review of TV by the Commission mentioned in amendment 27, this should not lead to a QS above the generic QS.
145	Annex III	Not support	Object to setting QS by Commission via delegated acts
146	Annex III	Not support	What is rationale for a QS of 0,025?
147	Annex III	Not support	QS for total pharmaceuticals is not scientifically based.
148	Annex III	Not support	Compromise text (11383/24) is preferred.
149	Annex IV	Not support	The amendment obliges a member state to establish a threshold value for a substance, even if that substance is not a problem in that member state.
150	Annex V paragraph 1 point 2	Not support	NL prefers to follow the scientific advise and SCHEER opinion.
151	Annex V paragraph 1 point 2	Not support	NL prefers to follow the scientific advise and SCHEER opinion to restrict the EQS of 0.1 ug/L to surface waters currently used for drinking water abstraction. For surface water not intended for drinking water abstraction, the AA-EQS as derived by JRC should be kept as in the previous proposal.
152	Annex V paragraph 1 point 2	Neutral	NL suggests the Commission to start an expert group to research the possibilities for a technical guideline. Regrettable substitution should be avoided.
153	Annex V paragraph 1 point 2	Not support	Total PFAS is not acceptable for NL because this would not address the risks posed by PFAS properly.
154	Annex V paragraph 1 point 2	Not support	NL prefers to follow the scientific advise and SCHEER opinion.
155	Annex VI	Neutral	
156	Annex VI	Support	

On the issue of non deterioration NL would like to underline the importance of article 1, point 4a, of the compromise text (11383/24).

AUSTRIA

Table for comments – Priority substances

Table for MS comments reflecting on the amendments proposed by the EP

Notes: When completing the table, please keep the following rules:

- do not modify the table format by adding/removing/adjusting/merging/splitting cells and rows
- do not use active track-changes
- use the drop-down list in Column 3 to indicate the national position.
- please fill in and send the table in word format

EP amendment	Reference in the text	MS position	MS comment
1	Recital -1 new	Support	
2	Recital -1a new	Support	
3	Recital 1	Support	
4	Recital 1a new	Support	
5	Recital 1b new	Support	
6	Recital 1c new	Neutral	
7	Recital 1d new	Neutral	
8	Recital 1e new	Partially support	Agriculture is only one sector depending on the availability of water. AT proposes to delete the last two word “particularly agriculture”, which put an unjustified focus on one single sector.
9	Recital 1d new	Support	
10	Recital 1g new	Not support	Good status of water bodies and efficient management of water resources represents a priority for all water depending sectors.
11	Recital 1h new	Support	
12	Recital 1i new	Support	
13	Recital 1j new	Not support	The aim of adding this EG is not clear. Recital 1j not regarded necessary and proposed for deletion.
14	Recital 1k new	Not support	Chemical pollution of surface and groundwater poses a threat to all water dependent sectors and not only to agriculture. Could be merged with recital 1 as it reiterates the same statements less generally and focussing only on agriculture.
15	Recital 2a new	Support	

EP amendment	Reference in the text	MS position	MS comment
16	Recital 3a new	Support	
17	Recital 3b new	Neutral	
18	Recital 4	Not support	The text from the EC proposal should be kept. It is up to the Member States to check whether a threshold value should be specified for a substance. An obligation to derive threshold values for all substances in Annex II does not appear to make sense due to regional and local influencing factors.
19	Recital 4a	Support	
20	Recital 5	Support	
21	Recital 7	Support	
22	Recital 7a new	Support	
23	Recital 7b new	Not support	The maximum number of substances and groups of substances to be included in the watchlist should be limited as outlined in the EC proposal.
24	Recital 8	Not support	AT does not support the inclusion of PFAS total in the list of priority substances and in the list of groundwater pollutants. The derivation of a quality standard or an environmental quality standard for PFAS-total is very complex due to the diversity of substances and the different toxicity of the individual substances. Actually, the scientific basis as well as an established methodology are lacking.
25	Recital 8a new	Not support	Deriving an EQS in accordance with CIS Guideline No. 27 and based on toxicological data leads to a significantly higher EQS for glyphosate. Therefore it makes sense to specify an EQS value based on ecotoxicological data for surface waters not used for drinking water abstraction.
26	Recital 8b new	Not support	Atrazine should be removed from the list of priority substances in accordance with the coreper mandate because there is no EU-wide risk.
27	Recital 8c new	Scrutiny reservation	
28	Recital 8d new	Not support	Bisphenols are already taken into account in the regular revision of the list of priority substances and bisphenol-A is included in the EC proposal. The possible inclusion of further bisphenols in the watch list or in the list of priority substances should be examined in future updates. The extent to which the different toxicities can be taken into account via relative potency factors should also be examined. The scientific basis is currently lacking and there is a need for further research.

EP amendment	Reference in the text	MS position	MS comment
29	Recital 8d new	Not support	AT does not support the statement that the threshold values for pharmaceutically active compounds in groundwater should generally be a factor of 10 lower than the EQS for surface waters.
30	Recital 9a new	Neutral	
31	Recital 10	Neutral	
32	Recital 10a new	Neutral	
33	Recital 10b new	Not support	The substances on the watch lists are selected according to a defined method. Sulphates and xanthenes are taken into account in the prioritization. The selection of these substances for the watch list should follow the methodology and the criteria that were agreed for the revision of the watch lists.
34	Recital 10c new	Support	
35	Recital 11	Not support	The EQS Directive sets the objectives for good chemical status. Monitoring and assessment are within the responsibility of Member States. The application of various different methods to monitor a parameter should be possible on a voluntary basis. An obligation to apply different methods for the monitoring of a parameter is regarded unproportioned and is not supported by AT.
36	Recital 11a new	Scrutiny reservation	
37	Recital 12	Not support	The recital should be deleted as proposed in the Coreper mandate.
38	Recital 12a new	Support	
39	Recital 13a new	Support	
40	Recital 13b new	Neutral	
41	Recital 15	Not support	The text from the EC proposal should be kept. It is up to the Member States to check whether a threshold value should be specified for a substance. An obligation to derive threshold values for all substances in Annex II does not appear to make sense due to regional and local influencing factors.
42	Recital 20a new	Scrutiny reservation	
43	Recital 21	Support	
44	Recital 23	Neutral	
45	Recital 31	Support	

EP amendment	Reference in the text	MS position	MS comment
46	Recital 31new	Not support	The assessment takes place regularly in the course of updating the impact analyses as part of the preparation of the river basin management plans. A more frequent update would be disproportionately resource-intensive and is not considered expedient.
47	Recital 31b new	Neutral	
48	Recital 31c new	Neutral	
49	Recital 32	Neutral	
50	Recital 32a new	Not support	The introduction of an EPR system to finance water monitoring is not supported. Monitoring is established in MS and is continuously done. The introduction of an EPR system is very complex, cost intensive and associated to high administrative efforts.
51	Recital 32b new	Not support	The introduction of an EPR system to finance water monitoring is not supported. Monitoring is established in MS and is continuously done. The introduction of an EPR system is very complex, cost intensive and associated to high administrative efforts.
52	Recital 32c new	Support	
53	Recital 32d new	Not support	The introduction of an EPR system to finance water monitoring is not supported. Monitoring is established in MS and is continuously done. The introduction of an EPR system is very complex, cost intensive and associated to high administrative efforts.
54	Recital 34a new	Support	
55	Recital 34b new	Support	
Directive 2000/60/EC			
56	Article 1 paragraph 1 point 1 introductory part	Neutral	
57	Article 1 paragraph 1 point 2 point c	Scrutiny reservation	After re-inclusion of art. 16 in the coreper mandate, the new definition refers to art. 16, where criteria for the definition of priority hazardous substances are defined.
58	Article 1 paragraph 1 point 2 d)	Neutral	

EP amendment	Reference in the text	MS position	MS comment
59	Article 1 paragraph 1 point 2 d) a) new	Neutral	
60	Article 1 paragraph 1 point 2 d) b) new	Neutral	
61	Article 1 paragraph 1 point 3	Neutral	
62	Article 1 paragraph 1 point 4 point 1	Neutral	
63	Article 1 paragraph 1 point 4 point ba	Scrutiny reservation	
64	Article 1 paragraph 1 point 6 point a	Partially support	Adaptation of technical specifications and standards for analytical methods should be done by implementing acts.
65	Article 1 paragraph 1 point 6 point a) a) new	Neutral	
66	Article 1 paragraph 1 point 6 b)	Not support	Please refer to the modified text in the coreper mandate. The reporting of monitoring data should occur every three years and no status information should be included in the reporting obligation.
67	Article 1 paragraph 1 point 7 a new	Neutral	
68	Article 1 paragraph 1 point 7 b) new	Not support	Agriculture is only one of many water consumers. Any list would have to include all sectors.
69	Article 1 paragraph 1 point 8 a new	Neutral	
70	Article 1 paragraph 1 point 9	Neutral	Please refer to the modified text in the coreper mandate (see WFD Art. 12(4-new)).
71	Article 1 paragraph 1 point 9	Neutral	

EP amendment	Reference in the text	MS position	MS comment
72	Article 1 paragraph 1 point 9 a	Not support	EC already has instruments in case of incomplete implementation of the directives. This amendment is not necessary and is therefore not supported by AT.
73	Article 1 paragraph 1 point 9 a new	Neutral	
74	Article 1 paragraph 1 point 10	Not support	The interim reports are disproportionately resource-intensive without any benefit. Therefore these reporting obligation should be deleted as proposed by the EC and supported by the council.
75	Article 1 paragraph 1 point 10 a new	Not support	As the interim reports should be removed, there is no need for the development and adoption of guidelines and templates for such reports.
76	Article 1 paragraph 1 point 12 point b	Not support	As the interim reports should be removed, there is no need for evaluation reports.
77	Article 1 paragraph 1 point 18a new	Scrutiny reservation	
78	Article 1 paragraph 1 point 20	Support	
Directive 2006/118/EC			
79	Article 2 paragraph 1 point 2	Neutral	
80	Article 2 paragraph 1 point 2	Not support	According to the WFD, the quantitative and the chemical status have to be assessed in groundwater. Good ecological status in groundwater is not defined in the WFD. Actually, no commonly agreed indicators or criteria are available for the description of a good ecological status in groundwater. A methodology for defining numerical criteria currently is also not available. Research needs are linked to this topic and a legally binding specification of such parameters and criteria must in any case be based on a reliable database and an agreed methodology.
81	Article 2 paragraph 1 point 4 point a) a) new	Not support	AT does not support the requirement that the threshold values for compounds in groundwater should generally be a factor of 10 lower than the EQS for surface waters as it is not based on scientific evidence.

EP amendment	Reference in the text	MS position	MS comment
82	Article 2 paragraph 1 point 4 point c)	Not support	The aim of the proposed amendment is not clear. In AT, the groundwater threshold values are published in a legal act, which is publicly accessible. The management plans also contain a compilation of the threshold values and these management plans must be subject to a public consultation procedure.
83	Article 2 paragraph 1 point 4 point d)	Neutral	
84	Article 2 paragraph 1 point 4 a new	Neutral	
85	Article 2 paragraph 1 point 6	Not support	The maximum number of substances and groups of substances to be included in the watchlist should be limited as outlined in the EC proposal.
86	Article 2 paragraph 1 point 6	Not support	Please refer to the revised wording in the coreper mandate. The inclusion of sulfates is not supported. Substance prioritisation and selection should follow the established and agreed methodology.
87	Article 2 paragraph 1 point 6	Scrutiny reservation	Which indicators of pollution?
88	Article 2 paragraph 1 point 6	Neutral	
89	Article 2 paragraph 1 point 6	Not support	The updating of the watch list should be clearly regulated and the requirement to update it every three years seems appropriate. More frequent updates are not regarded necessary.
90	Article 2 paragraph 1 point 6	Not support	The assessment takes place regularly in the course of updating the impact analyses as part of the preparation of the river basin management plans. A more frequent update would be disproportionately resource-intensive and is not considered expedient.
91	Article 2 paragraph 1 point 6	Neutral	
92	Article 2 paragraph 1 point 6 a new	Not support	According to the WFD, the quantitative and the chemical status have to be assessed in groundwater. Good ecological status in groundwater is not defined in the WFD. Actually, no commonly agreed indicators or criteria are available for the description of a good ecological status in groundwater. A methodology for defining numerical criteria currently is also not available.

EP amendment	Reference in the text	MS position	MS comment
			Research needs are linked to this topic and a legally binding specification of such parameters and criteria must in any case be based on a reliable database and an agreed methodology.
93	Article 2 paragraph 1 point 6 b) new	Scrutiny reservation	
94	Article 2 paragraph 1 point 6 c) new	Not support	The introduction of an EPR system to finance water monitoring is not supported. Monitoring is established in MS and is continuously done. The introduction of an EPR system is very complex, cost intensive and associated to high administrative efforts.
95	Article 2 paragraph 1 point 6 d) new	Support	
96	Article 2 paragraph 1 point 7	Not support	The review should be done every six years.
97	Article 2 paragraph 1 point 7	Partially support	Beside adoptions to Annex I also adoptions to Part B of Annex II should follow the ordinary legislative procedure.
98	Article 2 paragraph 1 point 7	Neutral	
99	Article 2 paragraph 1 point 7	Support	
100	Article 2 paragraph 1 point 7	Support	
101	Article 2 paragraph 1 point 7	Not support	AT does not support the inclusion of PFAS total in the list of groundwater pollutants. The derivation of a quality standard or an environmental quality standard for PFAS-total is very complex due to the diversity of substances and the different toxicity of the individual substances. Actually, the scientific basis as well as an established methodology are lacking.
102	Article 2 paragraph 1 point 7	Not support	The review should be done every six years.
103	Article 2 paragraph 1 point 8	Neutral	
104	Article 2 paragraph 1 point 8	Neutral	

EP amendment	Reference in the text	MS position	MS comment
105	Article 2 paragraph 1 point 8	Neutral	
106	Article 2 paragraph 1 point 8	Neutral	
107	Article 2 paragraph 1 point 14	Neutral	
Directive 2008/105/EC			
108	Article 3 paragraph 1 point 1a new	Neutral	
109	Article 3 paragraph 1 point 3 point a	Neutral	Please refer to the new wording in the coreper mandate.
110	Article 3 paragraph 1 point 3 point a	Scrutiny reservation	
111	Article 3 paragraph 1 point 3 point a	Not support	Double reporting should be avoided and emissions, discharges and losses already reported to the IEP should not have to be reported again.
112	Article 3 paragraph 1 point 3 point c)	Not support	Please refer to the new wording in the coreper mandate.
113	Article 3 paragraph 1 point 3 point c)	Not support	Please refer to the new wording in the coreper mandate.
114	Article 3 paragraph 1 point 4	Not support	The text from the EC proposal should be kept.
115	Article 3 paragraph 1 point 4	Neutral	The priority of source-oriented measures has been included in Art. 4(1a) in the new points (iv) and (v). Art. 16(6) has also been reintegrated into the coreper mandate.
116	Article 3 paragraph 1 point 4 a new	Neutral	
117	Article 3 paragraph 1 point 5	Not support	The review should be done every six years.

EP amendment	Reference in the text	MS position	MS comment
118	Article 3 paragraph 1 point 5	Partially support	Support to the EP amendment that requires legislative proposals for changes to the list of priority substances. Please refer to the new wording in the coreper mandate.
119	Article 3 paragraph 1 point 5	Not support	Please refer to the new wording in the coreper mandate.
120	Article 3 paragraph 1 point 5	Not support	AT does not support the inclusion of PFAS total in the list of priority substances. The derivation of a quality standard or an environmental quality standard for PFAS-total is very complex due to the diversity of substances and the different toxicity of the individual substances. Actually the scientific basis as well as an established methodological are lacking.
121	Article 3 paragraph 1 point 5	Not support	Bisphenols are already taken into account in the regular revision of the list of priority substances and bisphenol-A is included in the EC proposal. The possible inclusion of further bisphenols in the watch list or in the list of priority substances should be examined in future updates. The extent to which the different toxicities can be taken into account via relative potency factors should also be examined. The scientific basis is currently lacking and there is a need for further research.
122	Article 3 paragraph 1 point 5	Not support	The reports should be done every six years.
123	Article 3 paragraph 1 point 6	Not support	There is currently no agreed and uniform method available for such a presentation and it should be developed as part of the CIS process. As stated in the coreper mandate in Annex V point 1.4.3, this presentation should be possible on a voluntary basis and should not be a mandatory requirement.
124	Article 3 paragraph 1 point 6	Not support	Art. 8a(2) allows a reduction in the monitoring frequency for certain substances if sufficient and representative data is available. The EP amendment is very restrictive and limits this possibility to substances that are no longer placed on the market. This would result in an increase of the costs for monitoring without adding any additional value.
125	Article 3 paragraph 1 point 6	Not support	The EQS Directive sets the objectives for good chemical status. Monitoring and assessment are within the responsibility of Member States. The application of various different methods to monitor a parameter should be possible on a voluntary basis. An obligation to apply different methods for the monitoring of a parameter is regarded unproportioned and is rejected.

EP amendment	Reference in the text	MS position	MS comment
126	Article 3 paragraph 1 point 7	Not support	The maximum number of substances and groups of substances to be included in the watchlist should be limited as outlined in the EC proposal. Which indicators of pollution?
127	Article 3 paragraph 1 point 7	Neutral	
128	Article 3 paragraph 1 point 7	Neutral	Which indicators of pollution?
129	Article 3 paragraph 1 point 7	Neutral	
130	Article 3 paragraph 1 point 7	Not support	The updating of the watch list should be clearly regulated and the requirement to update it every three years seems appropriate. More frequent updates are not regarded necessary. The assessment takes place regularly in the course of updating the impact analyses as part of the preparation of the river basin management plans. A more frequent update would be disproportionately resource-intensive and is not considered expedient.
131	Article 3 paragraph 1 point 7	Neutral	
132	Article 3 paragraph 1 point 7 a)	Not support	The introduction of an EPR system to finance water monitoring is not supported. Monitoring is established in MS and is continuously done. The introduction of an EPR system is very complex, cost intensive and associated to high administrative efforts.
133	Article 3 paragraph 1 point 7 b)	Support	
134	Article 3 paragraph 1 point 8	Support	
135	Article 3 paragraph 1 point 8a new	Neutral	
136	Article 3 paragraph 1 point 8 b new	Neutral	
137	Article 3 paragraph 1 point 8 c new	Support	

EP amendment	Reference in the text	MS position	MS comment
138	Article 3 paragraph 1 point 8 d new	Neutral	
Annexes			
139	Annex I paragraph 1 point 10 a new	Neutral	
140	Annex I paragraph 1 point 18	Scrutiny reservation	
141	Annex II paragraph 1 point 1	Neutral	
142	Annex III	Not support	Please refer to the new wording and the definition of deadlines for achieving good status in the coreper mandate (GWD, art. 3(1a))
143	Annex III	Scrutiny reservation	
144	Annex III	Not support	No argumentation is provided for the proposed changes.
145	Annex III	Not support	AT does not support the inclusion of PFAS total in the list of groundwater pollutants. The derivation of a quality standard or an environmental quality standard for PFAS-total is very complex due to the diversity of substances and the different toxicity of the individual substances. Actually the scientific basis as well as an established methodological are lacking.
146	Annex III	Not support	The proposed values are not substantiated, whereas the quality criteria in the EC proposal are based on substance dossiers that were also evaluated by SCHEER.
147	Annex III	Not support	The sum parameter for pharmaceutical active substances should be deleted. Please refer to the coreper mandate.
148	Annex III	Not support	No argumentation is provided for setting the standards for non-relevant metabolites equal to the standards for pesticides active compounds and relevant metabolites. The values as proposed in the coreper mandate should be kept.
149	Annex IV	Not support	The text from the EC proposal should be kept. It is up to the Member States to check whether a threshold value should be specified for a substance. An obligation to derive threshold values for all substances in Annex II does not appear to make sense due to regional and local influencing factors.

EP amendment	Reference in the text	MS position	MS comment
150	Annex V paragraph 1 point 2	Not support	Atrazine should be removed from the list of priority substances in accordance with the coreper mandate because there is no EU-wide risk.
151	Annex V paragraph 1 point 2	Not support	The proposed amendment is not supported. Deriving an EQS in accordance with CIS Guideline No. 27 and based on toxicological data leads to a significantly higher EQS for glyphosate. Therefore it makes sense to specify an EQS value based on ecotoxicological data for surface waters not used for drinking water abstraction.
152	Annex V paragraph 1 point 2	Not support	Bisphenols are already taken into account in the regular revision of the list of priority substances and bisphenol-A is included in the EC proposal. The possible inclusion of further bisphenols in the watch list or in the list of priority substances should be examined in future updates. The extent to which the different toxicities can be taken into account via relative potency factors should also be examined. The scientific basis is currently lacking and there is a need for further research.
153	Annex V paragraph 1 point 2	Not support	AT does not support the inclusion of PFAS total in the list of priority substances. The derivation of a quality standard or an environmental quality standard for PFAS-total is very complex due to the diversity of substances and the different toxicity of the individual substances. Actually the scientific basis as well as an established methodological are lacking.
154	Annex V paragraph 1 point 2	Not support	The sum parameter for pharmaceutical active substances should be deleted. Please refer to the coreper mandate.
155	Annex VI	Neutral	
156	Annex VI	Support	

PL comments to the Priority Substances in water Directive, after the WPE on 2nd of the September.

1. Horizontal issue:

PL supports the following amendments of the Parliament: 103, 104, 105, 106, 118, 94, 132, 133;

PL is against the following amendments of Parliament: 96, 97, 98, 117, 122, 142;

PL may conditionally support the amendment: 95

2. Article 1 – amendments to the Water Framework Directive:

PL supports the following amendments of the Parliament: 58, 59, 60, 64;

PL is against the following amendments of Parliament: 62, 65, 72, 74, 75;

PL may conditionally support the amendment: 66

3. Article 2 – amendments to the Groundwater Directive:

PL supports the following amendments of the Parliament: -

PL is against the following amendments of Parliament: 85, 88, 89, 90, 101, 145, 146, 147, 154, 144;

PL may conditionally support the amendment: 86, 87, 91, 148

4. Article 3 – amendments to the Environmental Quality Standards Directive:

PL supports the following amendments of the Parliament: 129;

PL is against the following amendments of Parliament: 108, 126, 127, 130, 131, 120, 153, 154, 150, 151, 152;

PL may conditionally support the amendment: 128, 121, 125

5. Recitals:

PL supports the following amendments of the Parliament: 45;

PL is against the following amendments of Parliament: 18, 23, 27, 29, 33;

PL may conditionally support the amendment: 25, 26, 28, 31, 35, 39, 51

For amendments not referred to by PL in the above text, I inform you that PL declares neutral status.

SLOVAK REPUBLIC

Table for comments – Priority substances

SK comments reflecting on the amendments proposed by the EP

Notes: When completing the table, please keep the following rules:

- do not modify the table format by adding/removing/adjusting/merging/splitting cells and rows
- do not use active track-changes
- use the drop-down list in Column 3 to indicate the national position.
- please fill in and send the table in word format

EP amendment	Reference in the text	SK position	SK comment
1	Recital -1 new	Choose an option ↓	
2	Recital -1a new	Choose an option ↓	
3	Recital 1	Choose an option ↓	
4	Recital 1a new	Choose an option ↓	
5	Recital 1b new	Support	
6	Recital 1c new	Not support	
7	Recital 1d new	Support	
8	Recital 1e new	Choose an option ↓	
9	Recital 1d new	Support	
10	Recital 1g new	Not support	
11	Recital 1h new	Choose an option ↓	
12	Recital 1i new	Choose an option ↓	
13	Recital 1j new	Not support	
14	Recital 1k new	Support	
15	Recital 2a new	Not support	
16	Recital 3a new	Support	
17	Recital 3b new	Choose an option ↓	
18	Recital 4	Support	

EP amendment	Reference in the text	SK position	SK comment
19	Recital 4a	Choose an option ↓	
20	Recital 5	Support	
21	Recital 7	Choose an option ↓	
22	Recital 7a new	Choose an option ↓	
23	Recital 7b new	Choose an option ↓	
24	Recital 8	Partially support	We do not agree with setting the quality standards for PFAS by the Commission delegated act. We support the Council's proposal, whereby "PFAS-total" will be monitored on a voluntary basis and using the method developed in accordance with Article 13(7) of the Directive (EU) 2020/2184.
25	Recital 8a new	Choose an option ↓	
26	Recital 8b new	Choose an option ↓	
27	Recital 8c new	Partially support	The statement that "no groundwater threshold values should be higher than the EQS for surface water" applies to the associated bodies of surface water, but not in general for all possible receptors.
28	Recital 8d new	Choose an option ↓	
29	Recital 8d new	Partially support	First of all, it is necessary to define what "a groundwater ecosystem" is. We prefer to derive an "additional assessment factor" for groundwater protection based on more scientific studies (not to set the value at 10).
30	Recital 9a new	Choose an option ↓	
31	Recital 10	Choose an option ↓	
32	Recital 10a new	Choose an option ↓	
33	Recital 10b new	Choose an option ↓	
34	Recital 10c new	Choose an option ↓	
35	Recital 11	Choose an option ↓	
36	Recital 11a new	Choose an option ↓	
37	Recital 12	Not support	
38	Recital 12a new	Choose an option ↓	
39	Recital 13a new	Choose an option ↓	

EP amendment	Reference in the text	SK position	SK comment
40	Recital 13b new	Choose an option ↓	
41	Recital 15	Support	
42	Recital 20a new	Support	
43	Recital 21	Choose an option ↓	
44	Recital 23	Choose an option ↓	
45	Recital 31	Choose an option ↓	
46	Recital 31new	Choose an option ↓	
47	Recital 31b new	Choose an option ↓	
48	Recital 31c new	Choose an option ↓	
49	Recital 32	Choose an option ↓	
50	Recital 32a new	Choose an option ↓	
51	Recital 32b new	Not support	EPR should be dealt separately at EU level (directive/regulation) rather than in partial directives (incl. UWWT directive)
52	Recital 32c new	Support	
53	Recital 32d new	Not support	The same as amendment 51
54	Recital 34a new	Choose an option ↓	
55	Recital 34b new	Choose an option ↓	
Directive 2000/60/EC			
56	Article 1 paragraph 1 point 1 introductory part	Choose an option ↓	
57	Article 1 paragraph 1 point 2 point c	Partially support	The definition revised by Council members and it is in line with EP proposal
58	Article 1 paragraph 1 point 2 d)	Support	
59	Article 1 paragraph	Support	

EP amendment	Reference in the text	SK position	SK comment
	1 point 2 d) a) new		
60	Article 1 paragraph 1 point 2 d) b) new	Choose an option ↓	
61	Article 1 paragraph 1 point 3	Partially support	Council members revised the text which is in line with EP proposal. The reservation to the last sentence – the mechanism for emergency communication and response is already in place in all MS.
62	Article 1 paragraph 1 point 4 point 1	Not support	
63	Article 1 paragraph 1 point 4 point ba	Support	
64	Article 1 paragraph 1 point 6 point a	Scrutiny reservation	
65	Article 1 paragraph 1 point 6 point a) a) new	Neutral	
66	Article 1 paragraph 1 point 6 b)	Not support	We fully support the Council members revised the text.
67	Article 1 paragraph 1 point 7 a new	Partially support	
68	Article 1 paragraph 1 point 7 b) new	Not support	Why agriculture is emphasized?
69	Article 1 paragraph 1 point 8 a new	Not support	
70	Article 1 paragraph 1 point 9	Partially support	The second sentence is not clear.
71	Article 1 paragraph 1 point 9	Partially support	

EP amendment	Reference in the text	SK position	SK comment
72	Article 1 paragraph 1 point 9 a	Not support	
73	Article 1 paragraph 1 point 9 a new	Not support	
74	Article 1 paragraph 1 point 10	Support	
75	Article 1 paragraph 1 point 10 a new	Not support	
76	Article 1 paragraph 1 point 12 point b	Support	
77	Article 1 paragraph 1 point 18a new	Choose an option ↓	
78	Article 1 paragraph 1 point 20	Choose an option ↓	
Directive 2006/118/EC			
79	Article 2 paragraph 1 point 2	Not support	redundant
80	Article 2 paragraph 1 point 2	Not support	We have reservation to new requirements of monitoring of groundwater ecosystems and assessment of ecological status. The WFD clearly defines that the groundwater bodies are assessed for quantitative and chemical status. Before any discussion about the requirements to monitor and assess GW ecosystem, it is necessary to agree on the definition of "groundwater ecosystems".
81	Article 2 paragraph 1 point 4 point a) a) new	Not support	We reject proposal that "the threshold values applicable to groundwater shall be 10 times lower than the corresponding EQS for surface water", as not all pollutants in groundwater are relevant for surface water and vice versa.
82	Article 2 paragraph 1 point 4 point c)	Not support	Not clear terminology and purpose of the amendment
83	Article 2 paragraph	Partially support	Agree with this amendment, but in the form of the revised text of the Council members

EP amendment	Reference in the text	SK position	SK comment
	1 point 4 point d)		
84	Article 2 paragraph 1 point 4 a new	Partially support	Agree with this amendment, but in the revised text of the Council members
85	Article 2 paragraph 1 point 6	Not support	Maximum 5 substances (not "minimum 5 substances)
86	Article 2 paragraph 1 point 6	Not support	Agreement with revision of the Council.
87	Article 2 paragraph 1 point 6	Support	
88	Article 2 paragraph 1 point 6	Support	
89	Article 2 paragraph 1 point 6	Support	
90	Article 2 paragraph 1 point 6	Not support	
91	Article 2 paragraph 1 point 6	Support	
92	Article 2 paragraph 1 point 6 a new	Support	
93	Article 2 paragraph 1 point 6 b) new	Support	
94	Article 2 paragraph 1 point 6 c) new	Not support	EPR should be dealt with in a separate directive/regulation. The same reservation was in case of UWWT directive.
95	Article 2 paragraph 1 point 6 d) new	Partially support	We reject EPR – it is fragmentation of the complex issue into each partial directive (incl. UWWT Directive). EPR should be deal with in separate directive to be adopted in full legislative process. Agreement with JMF.
96	Article 2 paragraph 1 point 7	Not support	We insist of 6 years
97	Article 2 paragraph 1 point 7	Not support	Do not agree with delegated acts

EP amendment	Reference in the text	SK position	SK comment
98	Article 2 paragraph 1 point 7	Choose an option ↓	
99	Article 2 paragraph 1 point 7	Support	
100	Article 2 paragraph 1 point 7	Support	
101	Article 2 paragraph 1 point 7	Not support	We do not agree with delegated acts. We support the harmonization of QS for PFAS-total with Directive 2020/2184. We support modified wording in the Council proposal regarding PFAS, whereby PFAS-total will be monitored on a voluntary basis and using the method developed in accordance with Art 13(7) of the Directive 2020/2184
102	Article 2 paragraph 1 point 7	Not support	We insist on 6 years
103	Article 2 paragraph 1 point 8	Not support	The text was revised by Council members. Not relevant anymore.
104	Article 2 paragraph 1 point 8	Not support	The same as no. 103
105	Article 2 paragraph 1 point 8	Support	
106	Article 2 paragraph 1 point 8	Choose an option ↓	
107	Article 2 paragraph 1 point 14	Not support	Not relevant
Directive 2008/105/EC			
108	Article 3 paragraph 1 point 1a new	Not support	
109	Article 3 paragraph 1 point 3 point a	Not support	
110	Article 3 paragraph 1 point 3 point a	Partially support	What does it mean « easily accessible »
111	Article 3 paragraph	Not support	

EP amendment	Reference in the text	SK position	SK comment
	1 point 3 point a		
112	Article 3 paragraph 1 point 3 point c)	Not support	We revised text, not relevant anymore
113	Article 3 paragraph 1 point 3 point c)	Not support	Not relevant anymore
114	Article 3 paragraph 1 point 4	Choose an option ↓	
115	Article 3 paragraph 1 point 4	Not support	redundant
116	Article 3 paragraph 1 point 4 a new	Choose an option ↓	
117	Article 3 paragraph 1 point 5	Not support	We insist on 6 years.
118	Article 3 paragraph 1 point 5	Support	Preference of legislative process, not delegated act
119	Article 3 paragraph 1 point 5	Choose an option ↓	
120	Article 3 paragraph 1 point 5	Partially support	Agreement with the establishment of technical guidelines. No agreement with delegated act
121	Article 3 paragraph 1 point 5	Partially support	We agree with requirement that Commission will publish method for Bisphenol. EQS should be derived on scientific knowledge – in that case, it is possible to have a delegated act.
122	Article 3 paragraph 1 point 5	Not support	
123	Article 3 paragraph 1 point 6	Not support	Full article was revised by council members
124	Article 3 paragraph 1 point 6	Support	
125	Article 3 paragraph 1 point 6	Not support	We do not agree. JRC might assess and develop effect based methods, however, without obligatory involvement of member states. Member state should have a freedom to select monitoring method. We are in favour of Council compromise

EP amendment	Reference in the text	SK position	SK comment
			text. This article has a good intention about the substances and their mixtures, however, it is expensive. After effect based method use, chemical analyses would be required anyway.
126	Article 3 paragraph 1 point 7	Not support	Maximum of 5 substances (not "minimum of 5 substances"). However, the rest of EP amendment needs more time to understand the meaning
127	Article 3 paragraph 1 point 7	Not support	Not support, Commission has already sufficient amount of options to propose candidates to the Watchlist.
128	Article 3 paragraph 1 point 7	Choose an option ↓	
129	Article 3 paragraph 1 point 7	Support	
130	Article 3 paragraph 1 point 7	Not support	
131	Article 3 paragraph 1 point 7	Choose an option ↓	
132	Article 3 paragraph 1 point 7 a)	Not support	EPR should be dealt with in a separate directive/regulation. The same reservation was in case of UWWT directive
133	Article 3 paragraph 1 point 7 b)	Not support	EPR should be dealt with in a separate directive/regulation. The same reservation was in case of UWWT directive.
134	Article 3 paragraph 1 point 8	Support	
135	Article 3 paragraph 1 point 8a new	Choose an option ↓	
136	Article 3 paragraph 1 point 8 b new	Choose an option ↓	
137	Article 3 paragraph 1 point 8 c new	Support	
138	Article 3 paragraph 1 point 8 d new	Choose an option ↓	
Annexes			

EP amendment	Reference in the text	SK position	SK comment
139	Annex I paragraph 1 point 10 a new	Not support	Monitoring is a long-term planning process, with heavy administrative cost involved. Not possible to monitor various substances in various frequencies and various seasons
140	Annex I paragraph 1 point 18	Not support	Not relevant
141	Annex II paragraph 1 point 1	Not support	
142	Annex III	Not support	
143	Annex III	Not support	
144	Annex III	Not support	We do not agree with stricter quality standards for active substances in pesticides (incl. relevant metabolites) without providing scientific studies and justification.
145	Annex III	Not support	We do not agree with setting the quality standard for PFAS - total by the Commission delegated act. We support the Council's proposal, whereby "PFAS-total" will be monitored on a voluntary basis and using the method developed in accordance with Article 13(7) of the Directive (EU) 2020/2184.
146	Annex III	Not support	We do not agree with stricter quality standard for Carbamazepine without providing scientific studies with proper justification.
147	Annex III	Not support	We do not agree with stricter quality standard for pharmaceuticals without providing scientific studies with proper justification.
148	Annex III	Not support	We support the Council members revised QS for nrMs.
149	Annex IV	Not support	
150	Annex V paragraph 1 point 2	Not support	We reject. EQS are scientifically derived and verified by SCHEER. We cannot change the EQS based on intuition.
151	Annex V paragraph 1 point 2	Not support	
152	Annex V paragraph 1 point 2	Choose an option ↓	
153	Annex V paragraph 1 point 2	Partially support	Agreement with the establishment of technical guidelines. No agreement with delegated act
154	Annex V paragraph 1 point 2	Not support	
155	Annex VI	Not support	
156	Annex VI	Support	

FINLAND

Table for comments – Priority substances

Table for MS comments reflecting on the amendments proposed by the EP

Notes: When completing the table, please keep the following rules:

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- do not use active track-changes
- use the drop-down list in Column 3 to indicate the national position.
- please fill in and send the table in word format

EP amendment	Reference in the text	MS position	MS comment
1	Recital -1 new	Support	
2	Recital -1a new	Neutral	The recital is quite loosely related to the WFD, more related to the DWD
3	Recital 1	Neutral	
4	Recital 1a new	Neutral	
5	Recital 1b new	Neutral	
6	Recital 1c new	Neutral	
7	Recital 1d new	Neutral	
8	Recital 1e new	Support	
9	Recital 1d new	Neutral	
10	Recital 1g new	Neutral	
11	Recital 1h new	Neutral	
12	Recital 1i new	Neutral	
13	Recital 1j new	Neutral	
14	Recital 1k new	Neutral	
15	Recital 2a new	Not support	
16	Recital 3a new	Support	
17	Recital 3b new	Neutral	
18	Recital 4	Not support	
19	Recital 4a	Not support	art 16

EP amendment	Reference in the text	MS position	MS comment
20	Recital 5	Not support	art 16
21	Recital 7	Neutral	
22	Recital 7a new	Neutral	
23	Recital 7b new	Not support	The number maximum number of substances or group of substances stated in the directive.
24	Recital 8	Neutral	
25	Recital 8a new	Choose an option ↓	
26	Recital 8b new	Not support	
27	Recital 8c new	Neutral	
28	Recital 8d new	Not support	
29	Recital 8d new	Not support	
30	Recital 9a new	Neutral	
31	Recital 10	Support	
32	Recital 10a new	Not support	
33	Recital 10b new	Not support	
34	Recital 10c new	Neutral	
35	Recital 11	Not support	
36	Recital 11a new	Not support	
37	Recital 12	Support	Support that the Annex I could only be reviewed in an ordinary legislative process.
38	Recital 12a new	Support	
39	Recital 13a new	Support	
40	Recital 13b new	Support	
41	Recital 15	Not support	
42	Recital 20a new	Neutral	Not relevant
43	Recital 21	Support	
44	Recital 23	Neutral	
45	Recital 31	Neutral	
46	Recital 31new	Support	
47	Recital 31b new	Neutral	

EP amendment	Reference in the text	MS position	MS comment
48	Recital 31c new	Neutral	
49	Recital 32	Support	
50	Recital 32a new	Partially support	
51	Recital 32b new	Not support	
52	Recital 32c new	Support	
53	Recital 32d new	Not support	
54	Recital 34a new	Support	
55	Recital 34b new	Support	
Directive 2000/60/EC			
56	Article 1 paragraph 1 point 1 introductory part	Neutral	
57	Article 1 paragraph 1 point 2 point c	Not support	
58	Article 1 paragraph 1 point 2 d)	Support	The methods used should always be scientifically proven to be reliable and easily accessible in Member States.
59	Article 1 paragraph 1 point 2 d) a) new	Support	Reference to new DWD is ok.
60	Article 1 paragraph 1 point 2 d) b) new	Support	
61	Article 1 paragraph 1 point 3	Neutral	
62	Article 1 paragraph 1 point 4 point 1	Not support	Prefer the council Coreper mandate. These issues are included in renewed art 16 of the council compromise.
63	Article 1 paragraph 1 point 4 point ba	Not support	The protection of areas in annex IV are taken into account already by following the most stringent requirements set in the directives of which the protection of those areas is based on.

EP amendment	Reference in the text	MS position	MS comment
64	Article 1 paragraph 1 point 6 point a	Partially support	Not in favour of the delegated acts. Implementing acts are more relevant in this matter.
65	Article 1 paragraph 1 point 6 point a) a) new	Neutral	The EP proposal might increase the monitoring requirements, administrative burden, and costs. (Council amendments to point 3)
66	Article 1 paragraph 1 point 6 b)	Partially support	The correction to the reference to groundwaters is favourable. But no not support the yearly based reporting of the monitoring data so prefer the council Coreper mandate text: "made available every three years".
67	Article 1 paragraph 1 point 7 a new	Neutral	All EU legislation should be used to reach the environment objectives. End of pipe measures are one of the many measures. In many cases the diffuse pollution is cause of the deterioration of the status.
68	Article 1 paragraph 1 point 7 b) new	Neutral	
69	Article 1 paragraph 1 point 8 a new	Not support	The suspension of permit is based on the legislation of which the permit is granted.
70	Article 1 paragraph 1 point 9	Neutral	
71	Article 1 paragraph 1 point 9	Neutral	
72	Article 1 paragraph 1 point 9 a	Not support	Commission has other tools to react to the issue.
73	Article 1 paragraph 1 point 9 a new	Partially support	In principle, Finland welcomes the right of access to justice in all environmental matters. It's necessary that there is enough flexibility for member states to apply their own decision-making systems, f.e. the rule should not prevent Member States from requiring a preliminary review procedure before an administrative authority if such requirement exists in national law. The rule should also be in line with other environmental directives.

EP amendment	Reference in the text	MS position	MS comment
74	Article 1 paragraph 1 point 10	Not support	The interim reporting of the measures should be removed from the requirements, because the monitoring requirement will increase.
75	Article 1 paragraph 1 point 10 a new	Not support	
76	Article 1 paragraph 1 point 12 point b	Not support	Commission's interim reporting is no longer needed and should be deleted.
77	Article 1 paragraph 1 point 18a new	Not support	FI is in favour of digitalization of monitoring aspect, but it is important to not increase the reporting requirements.
78	Article 1 paragraph 1 point 20	Neutral	
Directive 2006/118/EC			
79	Article 2 paragraph 1 point 2	Support	
80	Article 2 paragraph 1 point 2	Not support	
81	Article 2 paragraph 1 point 4 point a) a) new	Not support	
82	Article 2 paragraph 1 point 4 point c)	Not support	
83	Article 2 paragraph 1 point 4 point d)	Support	
84	Article 2 paragraph 1 point 4 a new	Support	
85	Article 2 paragraph 1 point 6	Not support	The maximum number of the substances or groups of substances should provide.
86	Article 2 paragraph 1 point 6	Not support	Prefer the revised text in Council mandate text.

EP amendment	Reference in the text	MS position	MS comment
87	Article 2 paragraph 1 point 6	Neutral	
88	Article 2 paragraph 1 point 6	Not support	
89	Article 2 paragraph 1 point 6	Not support	
90	Article 2 paragraph 1 point 6	Not support	
91	Article 2 paragraph 1 point 6	Not support	The requirement should be in line with the requirement in EQS directive.
92	Article 2 paragraph 1 point 6 a new	Not support	
93	Article 2 paragraph 1 point 6 b) new	Not support	
94	Article 2 paragraph 1 point 6 c) new	Not support	
95	Article 2 paragraph 1 point 6 d) new	Partially support	Fi find that the extended producer responcibility causes administrative burden.
96	Article 2 paragraph 1 point 7	Not support	The review should be harmonized with the planning cycle of the WFD.
97	Article 2 paragraph 1 point 7	Not support	Prefer the council compromise text. All changes to the list of pollutant should be done in and ordinary legislative proposal.
98	Article 2 paragraph 1 point 7	Not support	The Commission shall take all relevant information into account when adopting legislative proposals.
99	Article 2 paragraph 1 point 7	Neutral	
100	Article 2 paragraph 1 point 7	Neutral	Prefer the Council compromise text.
101	Article 2 paragraph 1 point 7	Not support	Prefer the Council compromise text regarding PFAS quality standards. No delegated acts to commission in order to set new EQS values.

EP amendment	Reference in the text	MS position	MS comment
102	Article 2 paragraph 1 point 7	Neutral	This should be in line with other articles and with the planning cycle of the WFD.
103	Article 2 paragraph 1 point 8	Not support	Prefer the Council compromise text.
104	Article 2 paragraph 1 point 8	Not support	Prefer the Council compromise text.
105	Article 2 paragraph 1 point 8	Support	
106	Article 2 paragraph 1 point 8	Not support	Prefer the Council compromise text.
107	Article 2 paragraph 1 point 14	Neutral	
Directive 2008/105/EC			
108	Article 3 paragraph 1 point 1a new	Neutral	
109	Article 3 paragraph 1 point 3 point a	Neutral	Prefer the Council compromise text.
110	Article 3 paragraph 1 point 3 point a	Not support	
111	Article 3 paragraph 1 point 3 point a	Not support	
112	Article 3 paragraph 1 point 3 point c)	Partially support	Prefer the Council compromise text.
113	Article 3 paragraph 1 point 3 point c)	Not support	Prefer the Council compromise text.
114	Article 3 paragraph 1 point 4	Not support	The Commission report every 6 years would be more appropriate as in Commission proposal and in Council compromise text.
115	Article 3 paragraph 1 point 4	Not support	

EP amendment	Reference in the text	MS position	MS comment
116	Article 3 paragraph 1 point 4 a new	Neutral	
117	Article 3 paragraph 1 point 5	Not support	Prefer the Council compromise text. Should be in line with the WFD planning cycle.
118	Article 3 paragraph 1 point 5	Partially support	The Annex I should only be changes with an ordinary legislative proposal by the Commission.
119	Article 3 paragraph 1 point 5	Not support	
120	Article 3 paragraph 1 point 5	Not support	
121	Article 3 paragraph 1 point 5	Not support	There is a proposal of EQS for bisphenol-A in the Commission proposal.
122	Article 3 paragraph 1 point 5	Partially support	The timetable should be harmonize with other article and the WFD planning cycle.
123	Article 3 paragraph 1 point 6	Not support	
124	Article 3 paragraph 1 point 6	Neutral	
125	Article 3 paragraph 1 point 6	Not support	
126	Article 3 paragraph 1 point 7	Not support	
127	Article 3 paragraph 1 point 7	Not support	Prefer the Council compromise text.
128	Article 3 paragraph 1 point 7	Neutral	
129	Article 3 paragraph 1 point 7	Neutral	
130	Article 3 paragraph 1 point 7	Not support	Prefer the Council compromise text. It is not feasible to change the monitoring programmes so quickly. Not clear what is meant by the impact of energy transition in practice. Too much administrative burden.

EP amendment	Reference in the text	MS position	MS comment
131	Article 3 paragraph 1 point 7	Partially support	Prefer the Council compromise text.
132	Article 3 paragraph 1 point 7 a)	Not support	
133	Article 3 paragraph 1 point 7 b)	Partially support	Not in favour of the extended producer responsible.
134	Article 3 paragraph 1 point 8	Support	
135	Article 3 paragraph 1 point 8a new	Not support	
136	Article 3 paragraph 1 point 8 b new	Not support	
137	Article 3 paragraph 1 point 8 c new	Not support	
138	Article 3 paragraph 1 point 8 d new	Not support	
Annexes			
139	Annex I paragraph 1 point 10 a new	Not support	The EP amendment would increase the monitoring.
140	Annex I paragraph 1 point 18	Not support	The EP amendment would increase the administrative work to analyse the cause of the trends in groundwater.
141	Annex II paragraph 1 point 1	Not support	
142	Annex III	Not support	The new standards proposed for groundwaters cannot be applied in 6 months taking into account the River Basin management cycle.
143	Annex III	Not support	
144	Annex III	Not support	The quality standard should be in line with the DWD.
145	Annex III	Not support	Prefer the Council compromise text. No delegated acts to commission in order to set new EQS values.

EP amendment	Reference in the text	MS position	MS comment
146	Annex III	Not support	
147	Annex III	Not support	Prefer the Council compromise text. Large number of substances, more scientific knowledge is needed to set more strict values. No reliable methodology for such low EQS.
148	Annex III	Not support	Prefer the Council compromise text. The EQS values should always be based on resent scientific data.
149	Annex IV	Not support	
150	Annex V paragraph 1 point 2	Not support	Prefer the Council compromise text; move to Part C of Annex II.
151	Annex V paragraph 1 point 2	Not support	
152	Annex V paragraph 1 point 2	Not support	
153	Annex V paragraph 1 point 2	Not support	
154	Annex V paragraph 1 point 2	Not support	This would not be in line with the quality standards set for individual pharmaceuticals.
155	Annex VI	Not support	
156	Annex VI	Neutral	

SWEDEN

Table for comments – Priority substances

Table for MS comments reflecting on the amendments proposed by the EP

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EP amendment	Reference in the text	MS position	MS comment
1	Recital -1 new	Neutral	
2	Recital -1a new	Neutral	
3	Recital 1	Support	
4	Recital 1a new	Neutral	
5	Recital 1b new	Not support	
6	Recital 1c new	Not support	
7	Recital 1d new	Neutral	
8	Recital 1e new	Neutral	
9	Recital 1d new	Not support	
10	Recital 1g new	Partially support	
11	Recital 1h new	Not support	
12	Recital 1i new	Not support	
13	Recital 1j new	Not support	
14	Recital 1k new	Not support	
15	Recital 2a new	Not support	
16	Recital 3a new	Not support	
17	Recital 3b new	Not support	
18	Recital 4	Not support	
19	Recital 4a	Not support	

EP amendment	Reference in the text	MS position	MS comment
20	Recital 5	Support	
21	Recital 7	Partially support	
22	Recital 7a new	Partially support	
23	Recital 7b new	Not support	
24	Recital 8	Partially support	SE is open to discuss a compromise with EP. The instrument for implementation needs to be discussed as SE does not support delegated acts
25	Recital 8a new	Not support	
26	Recital 8b new	Not support	
27	Recital 8c new	Not support	
28	Recital 8d new	Partially support	SE is open to discuss a compromise with EP.
29	Recital 8d new	Partially support	SE is open to discuss a compromise with EP.
30	Recital 9a new	Partially support	
31	Recital 10	Neutral	
32	Recital 10a new	Not support	
33	Recital 10b new	Not support	
34	Recital 10c new	Neutral	
35	Recital 11	Partially support	SE is open to discuss a compromise with EP. SE does not support delegated acts.
36	Recital 11a new	Neutral	
37	Recital 12	Partially support	SE support that it is important that the legislation follows technical and scientific developments to not incur unnecessary costs. SE does not support delegated acts.
38	Recital 12a new	Not support	
39	Recital 13a new	Neutral	
40	Recital 13b new	Not support	
41	Recital 15	Not support	
42	Recital 20a new	Not support	
43	Recital 21	Support	
44	Recital 23	Not support	

EP amendment	Reference in the text	MS position	MS comment
45	Recital 31	Support	
46	Recital 31new	Not support	
47	Recital 31b new	Partially support	SE can discuss the wording in a recital concerning <i>Access to justice</i> , SE:s position is that the recital in that case should be similar to the wording in other related directives.
48	Recital 31c new	Partially support	SE can discuss the wording in a recital concerning <i>Access to justice</i> . SE:s position is that the recital in that case should be similar to the wording in other related directives.
49	Recital 32	Not support	
50	Recital 32a new	Not support	
51	Recital 32b new	Not support	
52	Recital 32c new	Not support	See recital 14a in the council mandate.
53	Recital 32d new	Not support	
54	Recital 34a new	Neutral	
55	Recital 34b new	Not support	
Directive 2000/60/EC			
56	Article 1 paragraph 1 point 1 introductory part	Support	
57	Article 1 paragraph 1 point 2 point c	Not support	
58	Article 1 paragraph 1 point 2 d)	Not support	
59	Article 1 paragraph 1 point 2 d) a) new	Support	SE support to update the reference to the current drinking water directive
60	Article 1 paragraph 1 point 2 d) b) new	Not support	
61	Article 1 paragraph 1 point 3	Not support	

EP amendment	Reference in the text	MS position	MS comment
62	Article 1 paragraph 1 point 4 point 1	Not support	
63	Article 1 paragraph 1 point 4 point ba	Not support	
64	Article 1 paragraph 1 point 6 point a	Not support	
65	Article 1 paragraph 1 point 6 point a) a) new	Neutral	SE does not oppose to that COM publish an assessment of possible application of online pollution monitoring systems of water quality
66	Article 1 paragraph 1 point 6 b)	Not support	
67	Article 1 paragraph 1 point 7 a new	Not support	SE prefer the council mandate where source-control is addressed in article 4.
68	Article 1 paragraph 1 point 7 b) new	Not support	
69	Article 1 paragraph 1 point 8 a new	Not support	
70	Article 1 paragraph 1 point 9	Not support	
71	Article 1 paragraph 1 point 9	Not support	
72	Article 1 paragraph 1 point 9 a	Not support	
73	Article 1 paragraph 1 point 9 a new	Not support	SE is open to discuss an amendment concerning <i>Access to justice</i> in the recitals 31b and 31 c (please see above)
74	Article 1 paragraph 1 point 10	Not support	
75	Article 1 paragraph	Not support	

EP amendment	Reference in the text	MS position	MS comment
	1 point 10 a new		
76	Article 1 paragraph 1 point 12 point b	Not support	
77	Article 1 paragraph 1 point 18a new	Not support	
78	Article 1 paragraph 1 point 20	Support	
Directive 2006/118/EC			
79	Article 2 paragraph 1 point 2	Support	
80	Article 2 paragraph 1 point 2	Not support	
81	Article 2 paragraph 1 point 4 point a) a) new	Not support	
82	Article 2 paragraph 1 point 4 point c)	Not support	
83	Article 2 paragraph 1 point 4 point d)	Support	
84	Article 2 paragraph 1 point 4 a new	Partially support	The text needs to be updated. This EP proposal is covered in Annex IV part D
85	Article 2 paragraph 1 point 6	Not support	
86	Article 2 paragraph 1 point 6	Partially support	SE is open to discuss monitoring of microplastics and AMR. However, we do not support the sentence concerning sulfates.
87	Article 2 paragraph 1 point 6	Not support	
88	Article 2 paragraph 1 point 6	Not support	

EP amendment	Reference in the text	MS position	MS comment
89	Article 2 paragraph 1 point 6	Support	SE is open to discuss that the watch list can be updated in case scientific evidence emerges that would necessitate the list to be updated.
90	Article 2 paragraph 1 point 6	Not support	
91	Article 2 paragraph 1 point 6	Not support	
92	Article 2 paragraph 1 point 6 a new	Not support	
93	Article 2 paragraph 1 point 6 b) new	Not support	
94	Article 2 paragraph 1 point 6 c) new	Not support	
95	Article 2 paragraph 1 point 6 d) new	Partially support	SE prefer the text related to the monitoring facility in the council mandate (Art 1 (6) point 6). However, the suggested definitions of functions (a-c) are relevant and could be included in the review.
96	Article 2 paragraph 1 point 7	Not support	
97	Article 2 paragraph 1 point 7	Not support	
98	Article 2 paragraph 1 point 7	Not support	
99	Article 2 paragraph 1 point 7	Neutral	
100	Article 2 paragraph 1 point 7	Not support	
101	Article 2 paragraph 1 point 7	Partially support	SE is open to discuss a compromise with EP, however the instruments for implementation will have to be discussed.
102	Article 2 paragraph 1 point 7	Not support	
103	Article 2 paragraph 1 point 8	Not support	

EP amendment	Reference in the text	MS position	MS comment
104	Article 2 paragraph 1 point 8	Not support	
105	Article 2 paragraph 1 point 8	Support	
106	Article 2 paragraph 1 point 8	Not support	
107	Article 2 paragraph 1 point 14	Not support	
Directive 2008/105/EC			
108	Article 3 paragraph 1 point 1a new	Not support	
109	Article 3 paragraph 1 point 3 point a	Not support	
110	Article 3 paragraph 1 point 3 point a	Not support	
111	Article 3 paragraph 1 point 3 point a	Not support	
112	Article 3 paragraph 1 point 3 point c)	Not support	
113	Article 3 paragraph 1 point 3 point c)	Not support	
114	Article 3 paragraph 1 point 4	Not support	
115	Article 3 paragraph 1 point 4	Neutral	
116	Article 3 paragraph 1 point 4 a new	Not support	

EP amendment	Reference in the text	MS position	MS comment
117	Article 3 paragraph 1 point 5	Not support	
118	Article 3 paragraph 1 point 5	Not support	
119	Article 3 paragraph 1 point 5	Not support	
120	Article 3 paragraph 1 point 5	Partially support	SE is open to discuss a compromise with EP, however the instrument for implementation will have to be discussed.
121	Article 3 paragraph 1 point 5	Partially support	SE is open to discuss a compromise with EP.
122	Article 3 paragraph 1 point 5	Not support	
123	Article 3 paragraph 1 point 6	Not support	
124	Article 3 paragraph 1 point 6	Not support	
125	Article 3 paragraph 1 point 6	Partially support	Effect based methods are an important instrument for monitoring of estrogenic substances. SE is therefore open to discuss a compromise with EP. However, the instruments for implementation will have to be discussed.
126	Article 3 paragraph 1 point 7	Not support	
127	Article 3 paragraph 1 point 7	Partially support	SE is open to discuss monitoring of microplastics and AMR. However, the selection of substances on the WL should be done according to the procedure described in article 8b.
128	Article 3 paragraph 1 point 7	Not support	
129	Article 3 paragraph 1 point 7	Neutral	
130	Article 3 paragraph 1 point 7	Partially support	SE is open to discuss a compromise with EP, concerning the need for updating the watch list more frequently if new scientific evidence emerges. SE <u>does not support</u> to evaluate every two years the impact on water quality related to the energy transition.

EP amendment	Reference in the text	MS position	MS comment
131	Article 3 paragraph 1 point 7	Not support	
132	Article 3 paragraph 1 point 7 a)	Not support	
133	Article 3 paragraph 1 point 7 b)	Partially support	SE prefer the text related to the monitoring facility in the council mandate (Art 1 (6) point 6). However, the suggested definitions of functions (a-c) are relevant and could be included in the review.
134	Article 3 paragraph 1 point 8	Neutral	
135	Article 3 paragraph 1 point 8a new	Partially support	The text in this article needs to be revised. SE does not support delegated acts.
136	Article 3 paragraph 1 point 8 b new	Partially support	The text in this article needs to be revised. SE does not support delegated acts.
137	Article 3 paragraph 1 point 8 c new	Not support	
138	Article 3 paragraph 1 point 8 d new	Not support	
Annexes			
139	Annex I paragraph 1 point 10 a new	Not support	
140	Annex I paragraph 1 point 18	Not support	
141	Annex II paragraph 1 point 1	Not support	
142	Annex III	Support	SE is open to discuss a compromise with EP.
143	Annex III	Not support	
144	Annex III	Not support	
145	Annex III	Partially support	SE is open to discuss a compromise with EP, however the instrument for implementation will have to be discussed.
146	Annex III	Support	SE is open to discuss a compromise with EP
147	Annex III	Support	SE is open to discuss a compromise with EP

EP amendment	Reference in the text	MS position	MS comment
148	Annex III	Not support	
149	Annex IV	Not support	
150	Annex V paragraph 1 point 2	Not support	
151	Annex V paragraph 1 point 2	Not support	
152	Annex V paragraph 1 point 2	Partially support	SE is open to discuss a compromise with EP. However, the instruments for implementation will have to be discussed
153	Annex V paragraph 1 point 2	Partially support	SE is open to discuss a compromise with EP. However, the instruments for implementation will have to be discussed
154	Annex V paragraph 1 point 2	Support	SE is open to discuss a compromise with EP
155	Annex VI	Not support	
156	Annex VI	Neutral	