Water UK position paper

Setting of parametric values for pesticides

Summary position

- Water UK considers that, on balance, the 0.1 / 0.5ug/l standard is appropriate and that at this stage does not need to be changed in Annex 1 of the Drinking Water Directive.
- Water UK considers that the Commission should continue to develop the evidence base ahead of making future changes to parametric values.

Background

Annex 1 (Part B) of the Drinking Water Directive (98/83/EC) (DWD) sets parametric values for individual and total pesticides (including relevant metabolites) as 0.1ug/l and 0.5 ug/l respectively with the exception of Aldrin, Dieldrin, Heptachlor and Heptachlor epoxide all have individual values of 0.03ug/l. The DWD also states that only those pesticides which are likely to be present in a supply need to be monitored.

In general standards for pesticides in drinking water were set arbitrarily and at the time represented the best available understanding of the impacts on health. These were not health based rather based on a consensus and consideration given to public perception (with the exception of those that have 0.03ug/l parametric value).

There has been criticism of the parametric values in that they not specific to the health impacts of the individual pesticide or active (with the exception of the 0.03ug/l substances) and that pesticide standards set as a political standard to reflect the importance to the public of providing water that is deemed safe to drink.

UK perspective

In the UK the DWD is transposed into national laws in the three administrations and with a direct application of the Annex 1 (Part B) values.

Over the past 25 years water utilities have invested heavily in drinking water treatment technology to ensure that water for consumption does not exceed these standards. In recent years a number of pesticides have caused persistent problems that have led to these being exceeded (e.g. metaldehyde, MCPA and mecoprop). The options for treatment to address these pesticides are costly and would require substantial further investment.

Water utilities in the UK augment the end-of-pipe treatment options with a catchment based approach whereby they will work closely with farmers and agronomists to raise awareness of the impacts of pesticides and to work to

manage their application in such a way that the interaction with water courses is minimised.

This twin track approach of addressing the issue at source and investing in treatment options where necessary has been beneficial in managing pesticides in drinking water. However the use of risk based approaches, catchment management and voluntary agreements are still in relative infancy and more could be done to demonstrate their effectiveness.

Where there are specific challenges that this approach cannot mitigate then it may be necessary for governments to prohibit substances being used or to mandate product substitution in high risk areas. This approach needs careful consideration. Whilst it may address the application of a specific individual pesticide there could be consequences to the ability of an area to produce specific crops, thus impacting local economies, or the substance being used in its place could also have impacts on drinking water, especially if prohibition results in a change of crop with different crop protection product needs.

Considerations for the future of EU and national legislation

There is an argument that the revision of the DWD in 2016 should focus on the parametric values for pesticides with the view to relax them or introduce product specific standards. On balance Water UK considers that at this stage there are too many unanswered questions about the overall, long-term impacts of pesticides and their metabolites (particularly where they exist as mixtures) that the values set in the current DWD and corresponding national legislation should be retained.

However the Commission should:

- continue to develop the evidence base on pesticides and their metabolites and base future decisions on the outcomes of research.
- continue to ensure that other relevant EU legislation (WFD, Plant Products Regulation) supports the ability of a MS to be able to address its own pesticide specific challenges.

The number and type of pesticides is constantly evolving, and in particular some of the newer pesticides are very difficult to remove using normal currently accepted treatment (GAC or ozone/GAC or similar). The Commission and MS legislators could support the sector by promoting the benefits of considering the impacts on water at the point of product registration or licensing.

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