

Dutch water companies call on German environment minister Lemke to set limits on PFAS discharges into the Rhine

Dutch water companies that depend on water from the Rhine to make drinking water have sent a letter to German minister Lemke asking for limits to be placed on PFAS discharges into the Rhine. With these discharges, Germany is also failing to meet agreements made on water quality, as laid down in its own national and European legislation. Dutch citizens and companies have a growing need for clean drinking water in the coming years, but producing it is becoming increasingly expensive due to industrial discharges in Germany.

In the letter, the drinking water companies (united in RIWA-Rijn) remind that the German government, with the Netherlands, Denmark, Norway and Sweden, is a co-initiator of a European PFAS ban. RIWA-Rijn director Gerard Stroomberg says: 'The German government takes the view that PFAS compounds are so harmful that they should be banned throughout Europe, which is a position we warmly welcome. We call on the minister, until the PFAS ban is in place, to set limits on the discharge of PFAS compounds into the Rhine now. Our source of drinking water for 5 million people in the Netherlands deserves the highest possible level of protection.'

Prevention crucial

Pollution prevention is crucial. Because what is not discharged upstream into Rhine water does not need to be taken out by the Dutch drinking water companies. To improve this situation, RIWA-Rijn is committed to international cooperation and defining and enforcing rules. For the latter, it is essential that industrial discharge permits include emission limits that protect the river's drinking water function. RIWA-Rijn's annual report shows that in 2023, PFAS concentrations in the Rhine (sum of 23 PFAS compounds) exceeded the drinking water guideline value recommended by RIVM by a factor of 3 to 4.

Germany

In Germany, the government does not prescribe binding emission limit values for the discharge of PFAS compounds, the only exception being PFOS. For this reason, industrial discharge permits in North Rhine-Westphalia, for example, use orientation values for a sum of 14 PFAS compounds that are not legally enforceable. Even exceeding these orientation values by a factor of 10 has no legal consequences. For the lack of emission limit values, people point to the lack of a Best Available Technique (BAT) for the treatment of PFAS from industrial wastewater. This 'best technique' will be determined in cooperation with industry in a European context and only then will the German government be able to set emission limit values. RIWA-Rijn thinks this is the wrong course of action. Legally enforceable limit values, possibly with an implementation deadline, will encourage industry to develop better purification techniques or possibly alternatives to PFAS compounds more quickly.

Rhine Convention and European Industrial Emissions Directive

This year marks the 25th anniversary of the Rhine Convention in which the Rhine bordering countries guarantee in Article 5 'that the discharge of waste water that may affect water quality is subject to prior authorisation or to a generally binding regulation setting emission limit values'. And also according to Article 14 of the European Industrial Emissions Directive, 'the competent authority may

set stricter permit conditions than those achievable by using the best available techniques as described in the BAT conclusions. Member States may adopt rules allowing the competent authority to set such more stringent conditions.'

Rhine water quality targets structurally not met

On Tuesday 3 September 2024, RIWA-Rijn will publish its annual report for 2023. This report describes the water quality of the Dutch part of the Rhine river basin in 2023 at the border crossing at Lobith and at the intake points at Nieuwegein, Nieuwersluis and Andijk. Again this year, RIWA-Rijn concludes that a large number of substances exceed ERM target values. As a result, water companies are unable to make clean and healthy drinking water using simple natural purification methods. The objective of Article 7.3 of the Water Framework Directive (WFD) (... to reduce the level of purification required for the production of drinking water.) is also not being met. Stroomberg: 'In particular, we see the load of substances from urban wastewater, such as medicine residues, increasing. This is contrary to the 30% reduction target of the 2020 Rhine Ministerial Conference. To reduce medicine residues, it is important to speed up the upgrading of sewage treatment plants by improving these with a 4th cleaning step.'

Web links:

The Dutch version of the European River Memorandum (ERM) can be downloaded here:

<https://www.riwa-rijn.org/riwa-rijn/european-river-memorandum/>

The RIWA-Rijn theme report on the development of the required treatment effort for drinking water companies along the Rhine can be found here:

<https://www.riwa-rijn.org/en/publicatie/removal-requirement-and-purification-treatment-effort-for-the-dutch-rhine-water-from-2000-2018-2/>

The ICBR report describing the assessment of the 30% reduction target can be downloaded here:

<https://www.iksr.org/nl/publieksvoorlichting/documenten/archief/rapporten/rapporten-en-brochures-afzonderlijk/287-vermindering-van-microverontreinigingen-in-het-rijnstroomgebied-monitoring-en-beoordelingssysteem>

About RIWA-Rijn: *In the Netherlands, 5 million people depend on the Rhine for their drinking water. RIWA-Rijn, the Association of Rhine Water Companies, is a knowledge centre and advocate for the member drinking water companies in the Dutch Rhine basin. RIWA-Rijn is committed (inter)nationally to the good quality of Rhine water so that clean and healthy drinking water can be produced from it using natural, simple purification methods. RIWA-Rijn develops, gathers and disseminates knowledge in the Rhine basin and in Europe to achieve this goal. RIWA-Rijn works in the International Association of Drinking Water Companies in the Rhine River Basin (IAWR) together with 120 drinking water companies from six Rhine riparian states; Germany, France, Switzerland, Liechtenstein, Austria and the Netherlands.*