

# European Federation of the Associations of Dietitians

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Public consultation on Quality of Drinking  
Water in the EU  
European Commission  
Directorate General Health and Consumers,  
Unit D2  
Rue Breydel 4  
B-1040 Brussels

18 September 2014

Dear Sirs

## Re Public consultation on Quality of Drinking Water in the EU (Directive 98/83/EC)

The European Federation of the Associations of Dietitians (EFAD) and the European Specialist Dietetic Network (ESDN) in Public Health welcomes the opportunity to contribute to this consultation and evaluation of the EU Drinking Water Directive 98/83/EC.

EFAD is the only European professional organisation representing dietitians. It is a federation of thirty-three (33) National Dietetic Associations from twenty-six (26) EU countries, representing approximately 32,000 dietitians, which we estimate is half the dietetic workforce in Europe. Our Education Associate Membership is open to Higher Education Institutes that have education programmes for dietitians, creating a wide network of professionals with an expertise in nutrition and dietetics. One of the aims of EFAD is to support Member Associations in developing the role that dietitians have in reducing inequalities and improving nutritional health in Europe. By embedding dietetic education, professional practice and research activity throughout Europe, we enable high quality engagement at all levels, thereby addressing health determinants and creating supportive environments for healthy lifestyles and prevention of disease through nutrition. EFAD communicates its aims and objectives by fostering exchange of knowledge and best practice. The ESDN Public Health is a network within EFAD for European specialist dietitians sharing best practice and expertise to improve public health services.

EFAD supports the need for this EU initiative related to the quality of drinking water and concludes that implementation of the council Directive is essential for public health. A climate of openness and transparency is required and EFAD particularly would like to stress the importance of easily accessible information on the quality of drinking water.

We would like to comment on article 4 (general obligations) where it is mentioned that drinking water intended for human consumption must be wholesome and

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clean a) regulated to be free from any micro-organisms, parasites and any substances which in number or concentration constitutes a potential danger to human health and b) meets minimum requirements for microbiological parameters and chemical parameters. However, indicator parameters including colour, odour and taste are not included in the fulfilment of the obligations in article 4. Indicator parameters are only used for monitoring purposes and in article 8 (paragraph 6) as a consideration of risk to human health.

However EFAD believes that the sensory aspects of odour, colour and taste, whilst not imposing a direct risk for human health, may be a cause for concern and indirectly pose a risk to human health. If the sensory aspect is not included in the obligatory fulfilment there is a risk of people in areas where the tap water does not fulfil the sensory aspect buying bottled water for drinking rather than using tap water. In these cases the environmental cost of producing and distributing bottles (both plastic and glass) should be considered.

Other options such as carbonated drinks and sugary drinks could potentially also be used as a substitute for water which has direct implications on human health and in particular dental health. Reducing consumption of sugary drinks especially in children is an important part of the public health agenda. High quality tap water should be available to all and also be offered free of charge in all restaurants, catering outlets, schools, hospitals, public fountains, streets etc. Making the choice of tap water the easy option will help to reduce any environmental impact and also reduce intake of carbonated and/or sugary drinks.

The Directive suggests that for small water supplies (less than 1000m<sup>3</sup> distributed per day) the monitoring is on four samples per year and the audit monitoring of samples one per year. According to the commission's report on the Quality of Drinking Water in the EU which examined the Member States' reports for the period 2008-2010 there were reported problems in quality of drinking water from small supplies potentially affecting 11.5-15.5 million people in the EU. The Directive also suggests that Member states should report derogation to the commission for water supplies exceeding 1000m<sup>3</sup> per day or supplying more than 5000 people. We are concerned that less frequent monitoring of small water supplies could affect the development of high quality water from these supplies. Again the result could be that people choose carbonated and/or sugary drinks instead of water.

Dietitians in Member States would welcome the opportunity to work with the relevant bodies in addressing the issues raised above and look forward to the issue of the revised Directive.

Yours sincerely

Anne E de Looy  
Honorary President of EFAD