

Szczecin, Uppsala, 13.05.2020

Marek Gróbarczyk

**Ministry of Maritime Economy
and Inland Navigation**

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Commissioner for Environment, Oceans and
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Dear Mr. Marek Gróbarczyk,

Following my letter dated 04/03/2020 regarding the meeting of the Environment Council (ENVI) and previous correspondence from the European Environmental Bureau (EEB) side regarding the position of the Ministry in the "fitness check" process of the Water Framework Directive (DGWiZS.WPW letter .027.2.2.2019.MD) I would like to propose, together with supporting Polish scientists Science for Nature, solutions related to legal provisions. This time of water crisis is hard for us all. Water and its good condition concern us all, regardless of our position, social status, origin or place of residence.

At the meeting of the Environment Council, the Polish delegation expressed the opinion that European regulations on water management require modification due to the growing environmental problems related to the effects of climate change and the occurrence of pharmaceuticals and microplastics in the aquatic environment. Ministry has pointed out that the current Water Framework Directive does not specify it sufficiently, also in the context of EU funds allowing for the continuation of activities aimed at achieving environmental goals after 2027.

However, the conclusion of the "fitness check" process states: *"the Water Framework Directive is sufficiently prescriptive about the pressures that need to be addressed, and at the same time flexible enough to strengthen its implementation where necessary in relation to emerging challenges not listed in the directive, such as climate change, water scarcity and pollutants"*.

We believe that the lack of consideration of the aspect of pharmaceuticals and microplastics indicated by the Ministry is easy to fill out at the level of European and national law:

- by including these substances in the provisions of the national act on waste and packaging management, which has already happened in part, as well as in the water law.
- by taking into account the abovementioned substances in Directive 2008/105 / EC of the European Parliament and of the Council of 16 December 2008 on environmental quality standards in the field of

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water policy, possibly also in packaging management. The problem of microplastics should find a solution in waste management and introduction to the widespread use of biodegradable materials in place of plastic. So we see no reason to move the WFD because of this. The conclusion in this respect therefore refers to the effective implementation of waste policy in order to obtain better indicators than required by Directives 2018/851, 2008/98 / EC, 94/62 / EC.

We are worried about the attempts to weaken the monitoring system, which result from the content of the comments/position of the Ministry forwarded to the European Commission towards the WFD. Strengthening the efficiency of water monitoring is a social and scientific expectation. The last planning cycle and the year 2027 are approaching and we are obliged to achieve irrevocably good ecological status of waters. We expect that in accordance with the progressive movement, Polish Waters will start implementing the National Surface Water Renaturalisation Program (KPRWP), proving the actual change in water management towards greater care for the strategic natural resource, which is water and environmental quality. Recognizing KPRWP as a priority and our common goal, we count on its efficient implementation as the flagship program of Poland, distinguishing Polish water management amongst European countries.

By acting modern, drawing on the experience of other countries and developing modern own solutions, we will meet the requirements of the WFD and the European Green Deal, becoming a leader.

We believe that Polish water management, thanks to the wide implementation of the KPRWP, can effectively change the bad picture of the state of our country's environment (smog, huge water consumption in energy and agriculture, river pollution) by joining the mainstream of European Green Deal implementation. We are open to contact, meeting and conversation.

Kind regards,

Ewa Leś
Polish Ecological Club
member of [CCB](#), [KRR](#), [EEB](#)

Jakub Skorupski, PhD, Eng.,
Chairman
Coalition Clean Baltic

Prof. Roman Żurek
Institute of Nature Conservation
of the Polish Academy of Sciences
signatory of [Scientists4WFD letter](#)



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