



Région
PACA



PILOT ACTIONS ON THE APPLICATION OF THE DIRECTIVE 2000/60/EC “WATER FRAMEWORK DIRECTIVE”



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MAREMED Working Group on Water Framework Directive



Index

Introduction.....	3
Objective.....	3
Selection of pilot area.....	4
Participant regions.....	4
Deliverable.....	4
PILOT ACTION 1: Advanced Questionnaire	5
Intercalibration	5
Water Planning.....	6
WISE System	6
Transitional waters.....	7
Sampling	8
Priority substances.....	8
PILOT ACTION 2: Coastal monitoring sampling points.....	11
PILOT ACTION 3: WFD Interpretation and implementation.....	13

Introduction

MAREMED – Maritime Regions cooperation for Mediterranean, is a project started in 2010 and co-funded by the MED Programme, that involves 15 partners among Regions and local administrations from France, Italy, Spain, Greece and Cyprus together with the Conference of Peripheral Maritime Regions (CPMR)

The project is dealing with the following themes: maritime policy governance, the integrated management of coastal and maritime areas, fisheries, adaptation to climate change in coastal areas, efforts to reduce pollution and data management.

Its objective is to develop tools for enhancing and coordinating regional, European and Mediterranean policies on these six thematic strategies

Within the first work phase (diagnosis phase), developed during 2010 and 2011, it was carried out an overview of the policies implemented and their governance by the project partners. The second phase, corresponding to this stage, identifies pilot coastal zones in which it will be promoted transnational management initiatives and share operational tools to aid in decision-making for the six thematic strategies.

Objective

FEPORIS, as coordinator of the Water Framework (WFD) Directive Working Group has identified some pilot actions to be developed on this issue. The original envisaged single pilot action has been divided into three actions in order to facilitate their completion since each one may be addressed to different interviewees /groups of experts.

The aim of these pilot actions is to better understand those problems related to the technical and operative aspects of the implementation of the WFD in order to find common problems, best practices, etc, that could improve the implementation process and also to help other regions with their implementation of the WFD. The purpose is to establish a comparative framework on the state of implementation of the WFD among the project participant regions and informing the European Commission on the difficulties and problems found in the Mediterranean area for applying and duly interpreting the WFD.

Pilot actions identified are:

- **Advanced questionnaire.** This questionnaire focuses on several topics inside the WFD like:
 - Intercalibration
 - Water Planning
 - WISE system
 - Transitional waters
 - Sampling
 - Priority Substances

The questionnaire will also take advantage for clarifying those questions from the diagnosis phase questionnaire that were not well asked/answered due to different reasons.

- Coastal monitoring sampling points
- WFD Interpretation and implementation

Selection of pilot area

In order to make easier the development of the pilot actions, a local area or zone will be chosen for each participant region. The selected area has to be a representative coastal area facing common problems related to water quality/management in the coast. Ideal areas are those close to port areas, river mouths, coastal industrial areas, protected areas with high human pressure, etc...

Participant regions

Participant regions are those involved in MAREMED as partners:

- PACA
- Corse
- Crete
- Emilia-Romagna
- Lazio
- Liguria
- Marche
- Toscana
- Comunidad Valenciana
- Larnaca

Deliverable

A publishable document showing and analyzing main findings and conclusions will be delivered in order to inform the European Commission on the application of the WFD in Mediterranean coastal areas. The document will focus on the participating regions and their pilot areas but conclusions will be extrapolated to other Mediterranean areas if appropriate. FEPORTS will try to involve in these actions other Mediterranean coastal areas in order to have a wider perspective of the problems related to the WFD implementation.

It's expected to print around 600 copies of such document to be distributed among the partners, European Institutions, regional governments, etc. It will be also distributed in PDF format through the Internet.

PILOT ACTION 1: Advanced Questionnaire

This action is aimed at deepening into the understanding of the practical problems and hindrances related to the implementation of the WFD in maritime and coastal areas and identifying common problems / ways of proceeding. The proposed questionnaire is divided into sections and its purpose is to help to better understand the status of the WFD implementation in the considered areas and the use of management tools. Please, take the space you need if you want to remark or comment anything:

Intercalibration

To define the “Good Ecological Status”, in the first phase of intercalibration, which ended in 2008, it was not possible to intercalibrate all biological quality elements in all water categories. The existing gaps were due mainly to the lack of development of WFD compliant national assessment methods and the lack of data for some quality elements. The intercalibration exercise was therefore continued in a second phase from 2008 to 2011 in order to achieve comparable and WFD consistent class boundaries for all biological quality elements.

After the conclusions of the last intercalibration meeting (17-18 November):

1. Is the intercalibration process considered as finished?

The intercalibration process is not totally completed regarding our regional territory.

2. What are the main problems identified in your country/region respect to the intercalibration exercises?

The intercalibration process is not achieved for the phytoplankton descriptor (abundance) and the fish descriptor for transitional waters. Generally speaking, the challenge is to make all scientists work in perfect synergy. Indeed, each scientist developed its own methods and means to enforce them. But intercalibration is a large scale project that requires a precise job. Scientists must work as managers, constraint by deadlines and with limited funding.

3. Do you think intercalibration exercises have been good enough in order to compare different water bodies in different European regions? Why?

Yes. Because with all intercalibration exercises done so far, the sharing and linking of scientific data will facilitate the comparison and then the harmonization of thresholds by quality elements. Intercalibration is all the more important than water bodies often superate administrative boundaries, because River basin Authorities detain prerogatives upon one or more regions within a same state, and also because EU water bodies ignore also Member States' boundaries (International River Basin). Intercalibration method is also relevant for territories which share similar geo-physical and hydrological characteristics (Liguria/PACA or Languedoc-Roussillon/Cataluña for instance). Intercalibration is an innovative method in so far as it relies on the pooling of all the scientific data of each Member state. It obliges Member States to examine their methods, their results and make them consistent with other countries, and on all biological parameters.

Water Planning

Regarding River Basin Water Planning:

4. Has your River Basin Authority (or the correspondent management authority) got some specific DOCUMENT (study, assessment, analysis) for analyzing the previous situation of your River Basin/s?

The documents are in open access within the Agence de l'Eau Rhône-Méditerranée-Corse (AERMC) website, which is the competent River Basin Authority for PACA, Corsica, Rhône-Alpes and Languedoc-Roussillon Regions.

5. If so, could you give some link to it? Please, do not refer to monitoring networks or tools but documents¹ that analyze or assess the results of these networks or tools.

See links to the reports on the web server of the AERMC:

<http://www.rhone-mediterranee.eaufrance.fr/donnees-documents/index.php>

6. Could you identify these concrete studies (title, author, and year) and specify a link to them?

Cf. above.

WISE System

7. Do you know what WISE system is?

Yes, WISE was created under a partnership between the European Commission (DG Environment, Joint Research Centre and Eurostat) and the European Environment Agency. It gathers information and data collected by EU institutions on European water issues.

Does your region use the WISE System? Who?

The French State through its Water Agencies is in charge of data reporting to the European Union through the WISE system. In France a Water Agency is responsible for discussing the French position to hold in European meetings and explaining the scientific principles and issues for the year. It also embodies the role of "focal point" by tracing scientific information at the Ministerial and ONEMA (Office National de l'Eau et des Milieux Aquatiques) levels. ONEMA is the technical and scientific French reference organism on knowledge and monitoring of water status and ecological functioning of aquatic ecosystems. It was created by the French law on water and aquatic environments of 30 December 2006 (LEMA) and by the subsequent decree of 25 March 2007. A Water Agency also assumes a mediator function within the French Environmental Ministry (Ministère de l'Ecologie, du Développement durable et de l'Energie).

8. Do you consider this system useful?

Yes because it helps centralize, refine and gives visibility to data in order to achieve the WFD objectives for 2020.

¹ In the diagnosis phase some of the partners said that they carried out specific studies about the impact of the pressures of human activity on the water in the maritime and/or port areas.

But it would be very useful to be able to visualize easier the results done and shown at EU level at the scale of regions in order to improve coastal and maritime policies in function of these results.

Transitional waters

The WFD does not specify a minimum size for surface water categories, so the criteria for water bodies has been used to identify transitional waters that require designation. The Directive states that a water body must be 'discrete and significant'

9. In these terms, have your coastal transitional waters been completely identified and defined?

Yes (Rhône delta, Etang (Estanque) de Berre, Etang de Vacarès, Etang de Vaïne, Etang de Bolmon).

10. What are the specific problems encountered (if any)?

No specific problems are encountered regarding the identification of PACA transitional waters as defined by the WFD ("transitional waters" are defined as "bodies of surface water in the vicinity of river mouths which are partially saline in character as a result of their proximity to coastal waters but which are substantially influenced by freshwater flows").

11. Do you have any criteria to identify the size of a "transitional water body"?

Yes, the criterion chosen for "transitional water bodies" is > 50ha.

12. Do you think it is solved the problem for establishing the chemical quality status and ecological potential in the transitional waters of your region?

Yes, it is solved as the data measurement campaign has been carried out in 2006, 2009, and 2012 (every 3 year).

13. Could you list and give a map of the coastal transitional waters of your region?

Cf. 10 and:

http://www.paca.developpement-durable.gouv.fr/IMG/pdf/etat_ecologique_cle287df9.pdf

For an exhaustive overview, see the DREAL (Direction régionale de l'environnement, de l'aménagement et du logement) PACA Internet site dedicated section:

http://www.paca.developpement-durable.gouv.fr/cartopas-r345.html?page=rubrique&id_rubrique=345&id_article=366&masquable=OK

Sampling

14. What are the main problems do you face in order to establish the chemical quality /ecological status of your coastal waters? Please specify if they are technical (what specific problems: for example taking samples, sampling frequency, buoys or sensors access, management and maintenance, analysis time, delays, complexity in determination of certain parameters, uncertainties, etc), financial (lack of budget, lack of funds), administrative (lack of staff, lack of coordination, competences overlapping, lack of law development, etc).

The technical problem of the assessment of the chemical quality has been solved by using indirect measurement when the threshold level is under the detection range of the direct measurement.

15. What would be your necessities in order to make your work easier and to fulfill the WFD requirements?

The first necessity would be: adapt the threshold to the measurement which is really done.

Priority substances

Please: consult to an expert in this issue:

16. Have you identified the common priority substances to be monitored in your coastal waters?

Yes

17. Could you list the main priority substances that are being monitored?

The main priority substances which are being monitored are the complete list of annex 10 of the WFD.

Liste des 41 substances utilisées pour caractériser l'état chimique des eaux

	Les Substances Dangereuses Prioritaires de l'annexe X de la DCE (SDP)	Les Substances Prioritaires de l'annexe X de la DCE (SP)	Substances "Liste I" de la directive 76/464/CEE non incluses dans l'annexe X de la DCE
Objectifs de réduction nationaux (circulaire du 7 mai 2007)	50 % du flux des rejets à l'échéance 2015 (année de référence 2004)	30 % du flux des rejets à l'échéance 2015 (année de référence 2004)	50 % du flux des rejets à l'échéance 2015 (année de référence 2004)
Objectifs DCE sur les rejets	Suppression des rejets d'ici 2021 (20 ans après adoption par la Commission européenne de la liste des substances)	Réduction des rejets (pas de délai fixé)	Pas d'objectifs DCE sur les rejets
substances ou familles de substances concernées	Composés du Tributylétain (TBT) (Tributylétain-cation) PBDE (Pentabromodiphényléther) Nonylphénols (4-(para)-nonylphénol) Chloroalcane C10-C13 Somme de 5 HAP = * Benzo (g, h, i) Pérylène * Indeno (1, 2, 3-cd) Pyrène * Benzo (b) Fluoranthène * Benzo (a) Pyrène * Benzo (k) Fluoranthène Anthracène HAP *** Pentachlorobenzène Mercure et ses composés Cadmium et ses composés Hexachlorobenzène Hexachlorocyclohexane (Lindane) Hexachlorobutadiène Endosulfan *** (Alpha-endosulfan)	DEHP (Di (2-éthylhexyl) phtalate) Chlorure de méthylène (Dichlorométhane ou DCM) Octylphénols (Para-tert-octylphénol) Diuron Nickel et ses composés Plomb et ses composés Fluoranthène Chloroforme (Trichlorométhane) Atrazine Trichlorobenzène (TCB) Chlorpyrifos Naphtalène Alachlore Isoproturon Chlorfenvinphos Pentachlorophénol Benzène Simazine 1,2 Dichloroéthane Trifluraline	Perchloréthylène (Tétrachloroéthylène) Trichloroéthylène Aldrine Tétrachlorure de carbone DDT (Dichlorodiphényltri-chloroéthane) Dieldrine Isodrine Endrine

18. Are priority substances being measured in port waters?

No. But the Region helps finance studies, assessments and analysis regarding polluted sediments in ports. Our Region also initiated an action together with AFNOR (Association française de normalisation) and ECN (European Committee for Standardization), the "Ports Propres" sustainable and important initiative concerning Marinas in PACA for Ports managers. Even if WFD Annex 10 priority substances analysis is not an action part of "Ports Propres". Thus they are not being measured via this initiative. "Port Propres" is a joint action among the Regional Council, coastal provinces, the Water Agency, the national Agency for Energy (ADEME, Agence de l'Environnement et de la Maîtrise de l'Energie) and the decentralized state level dealing with environmental issues (DREAL PACA). Furthermore, PACA is also involved in the SEDIMED project alongside with "Pôle Mer PACA":

<http://www.polemerpaca.com/Environnement-et-amenagement-du-littoral/Port-du-futur/SEDIMED>

<http://www.regionpaca.fr/uploads/media/230.pdf>

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19. What are the main technical problems encountered when determining these specific substances? Specify for each substance the problem for the determination. For example:

Example of problems on the determination of priority substances

Priority Substance Determination problem

Mercury	WFD threshold level under the detection range of the equipment.
Lead	There's no for the moment an appropriate methodology adjusted for salt waters.
Zinc	Problems of contamination in laboratory (blank water has more zinc than the detection level requested in the WFD).
...	...

Analyses are done by national agreed laboratories that work with highest standards.

In the Mediterranean French Regions, we take into account that some analysis detection thresholds in seawaters are clearly upper the WFD thresholds and the fact that transit of contaminants in the water column is particularly variable and in Mediterranean often at an extremely low level (under analysis detection).

To solve the problem, the AERMC and Ifremer in charge decide to work with biota integrators (mussels) and passive integrators (DGT: Diffusive Gradient in Thin film) that allow to integrate the water column transit of contaminants. The results are treated after to fit with NQE ("Normes de Qualités Environnementales").

Today, methods of evaluation of the sea water by integrators of the different types are clearly important and efficient way that anyway need to be improve (particularly for some substances) through new developments.

20. What do you think about the threshold levels required in the WFD?

See above. When the threshold levels are under the detection range, the threshold must be expressed in the biota.

21. Do you think by using the present monitoring/analysis techniques is it possible to fully achieve the requirements of the WFD?

Yes

PILOT ACTION 2: Coastal monitoring sampling points

This action is aimed to better understand main differences among different countries in water sampling procedures. Some countries set the sampling points at a certain distance from the shore line (for instance 2 km) while others take the samples in the same shore-line. Results derived from the analysis of both samples will be clearly based upon different sampling procedures and therefore they won't be comparable. It's logical to think that a sample gathered 2 kms off the coast, where pollutants are more dispersed, will present more dilute values of certain parameters than a sample gathered in the shore-line close to a river mouth or a port area. According to the diagnostic phase, some Mediterranean countries are facing many troubles due to the bad quality of their coastal waters while others seem to be good status. Are different procedures and places for sampling involved in such results?

Please, give a map and/or geographical coordinates showing the main sampling points for the analysis of the parameters of each coastal water body identified for the WFD in your pilot area (you can also provide information relative to the whole regional coast). Please, specify the distance from the coast of each sampling point and, if available what parameters are measured and the frequency.

Regarding methodological aspects of the WFD declination, there are still some issues being resolved. This however does not hinder in any way the implementation of the WFD but maybe relevant to a particular characterization.

In France, WFD monitoring networks have been defined by the Working Group "WFD coastal Mediterranean" taking into account the recommendations made at the national level. This group led by the AERMC, which has met regularly since 2003 and brings together state representatives from the 3 DREAL Corsica, PACA, and Languedoc-Roussillon, and the 3 respective DDTM (Direction du Développement des Territoires et de la Mer) plus Ifremer.

At the initiative of the Water Agency Rhône-Mediterranean-Corsica and Ifremer, the results obtained by the monitoring networks of the WFD are presented in an interactive atlas. Unfortunately, the interactive atlas is under construction.

http://envlit.ifremer.fr/surveillance/directive_cadre_sur_l_eau_dce/la_dce_par_bassin/bassins_rhone_mediterranee_et_corse/fr/atlas_interactif

http://envlit.ifremer.fr/surveillance/directive_cadre_sur_l_eau_dce/la_dce_par_bassin/bassins_rhone_mediterranee_et_corse/fr/etat_des_lieux

http://envlit.ifremer.fr/surveillance/directive_cadre_sur_l_eau_dce/la_dce_par_bassin/bassins_rhone_mediterranee_et_corse/fr/frequences_d_echantillonnage

This assessment, which assesses progress in quality based on the latest results validated does not replace in any way the official inventory (put in place by the WFD text), which will be revised in 2013. Surveillance monitoring began in 2006 (Cf. supra). It is not intended to be

exercised on all bodies of water, but enough to allow a general assessment of the ecological and chemical status of water throughout the watershed. In Rhône, Mediterranean and Corsica, the choice of water masses is followed on the basis of several criteria (type of body of water, nature of anthropogenic pressures, experts' recommendations...). Thus, water bodies subject to WFD surveillance monitoring are many: 23 coastal water bodies of 47; and 15 water bodies in transition 31.

The selection of monitoring points was made taking into account existing monitoring networks and implemented by Ifremer, RINBIO (*Réseau Intégrateurs Biologiques*) and the "lagoon monitoring network" operated by Ifremer in partnership with the Languedoc-Roussillon Region and the AERMC.

Explain also the criteria followed for the establishment of those sampling points.

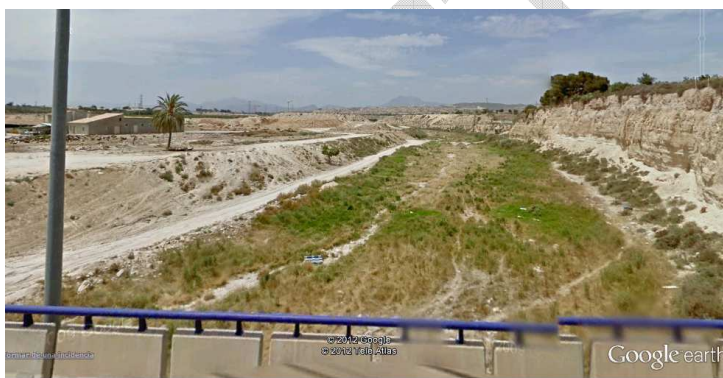
The criterion "Hydrodynamics" to identify homogeneous water masses for water sampling and geomorphology of the sea bed for the benthos sampling.

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PILOT ACTION 3: WFD Interpretation and implementation

This action aims at finding similar problems among regions related to water management and WFD implementation in Mediterranean coastal areas. A series of reflections are given, followed by some questions. These questions should be answered by Water Quality and Planning Managers in your regions (local or regional authorities). Every answer (yes or no) must be duly explained.

WFD enacts the ideal status of a water mass corresponds to its natural status. In Mediterranean areas there are no rivers like Rhin, Rhône or Danube. On the contrary, we find seasonal rivers similar to this:



WFD uses indicators for rivers with “constant” water, a circumstance that is not very common in the Mediterranean basin. The Mediterranean tackles with floods that oblige these kind of rivers to be regulated (dams, reservoirs, channels, etc) to prevent flooding and also to take advantage of this resource that is so scarce.

Human intervention is sometimes necessary for protecting and improving economical and environmental values. For instance, the river Serpis, in Valencia, flows into the Mediterranean Sea with a very low flow (under its ecological flow), heavy loaded with nutrients that cause eutrophication in coastal areas. A solution to protect the marine ecosystems in this area is to prevent this water to flow into the Sea by treating and diverting it (to irrigation fields/reservoirs/protected wetlands) to generate both economical and environmental wealth. These solutions apparently go against the WFD premises.

1 Could you give an example in your area representing the necessity of human intervention on Water resources in order to protect economical and environmental values?

Yes ☐

No ☐

Describe:

Below, regarding the Rhône-Mediterranean-Corsica water basin, a list of heavily modified water bodies (MEFM in French) for various reasons/purposes like hydroelectricity production, urbanization impacts... this list is directly extracted from the AERMC Internet site. For example, we can stress the Huveaune river near Marseille, some sections of the Var river and some sections of the Durance river.

The Etang de Berre at the north of Marseilles is another emblematic example of the necessity of human intervention on water resources. The eutrophication process due to water rejects inside the Etang cause various pressures on this fragile ecosystem. As with any lagoon environment, the ecosystem of the Etang is largely conditioned by the nature and quantity of inputs from its catchment: fresh water, silt, nutrients, contaminants. The freshwater input from both rainwater coming to the Etang via its watershed as well as the contributions of the EDF industrial power canal via the Durance conducted to a huge deterioration, tendency now inverted thanks to the great efforts made by the GIPREB, the organism in charge of defense and rehabilitation of the Etang de Berre (Groupement d'intérêt public pour la réhabilitation de l'Etang de Berre). The Etang de Berre was recently the object of an ecosystem contract (contrat d'étang) derivated from the WFD provisions (SAGE from the SDAGE). The Region is very attentive to the ecosystem quality and subsequent monitoring of Berre.

The European Commission, as well as elected officials or residents of the periphery of the Etang de Berre, could ask for a reopening of the litigation on the pollution of the water body invoking environmental provisions of European origin. The WFD particularly offers interesting possibilities for the Etang de Berre.

<http://www.rhone-mediterranee.eaufrance.fr/docs/dce/sdage/telechargements/RMed/exemptions/argumentaire-mefm-coursdo.pdf>

<http://www.etangdeberre.org/syndicat-mixte,2>

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2 Irrigation channels that flow into the sea and even rivers have certain amounts of pesticides, herbicides, fertilizers, etc. **Is your region carrying out any action in order to prevent these waters to pollute the sea?**

Yes ☐No ☐

Describe:

Refer for example to the same Internet link (answer 1: cf. supra) that describes river/water bodies' cards and inventory actions in order to prevent these waters to pollute the sea.

<http://www.rhone-mediterranee.eaufrance.fr/docs/dce/sdage/telechargements/RMed/exemptions/argumentaire-mefm-coursdo.pdf>

Despite TBT compounds (Tributyltin, a priority substance according to WFD) were forbidden in 2008 through the International Convention on the control of harmful anti-fouling systems on ships (AFS-Convention) and even a European Regulation is into force, still some amounts of TBT are detected in coastal water analysis, above all in port areas and shipping routes. Other compounds derived from illegal discharges or accidental spills (PAHs, also priority substances: anthracene, fluoranthene, etc) are also detected in these areas. They also come from the incomplete combustion of ship fuel. On the other hand, ship propellers turn over the sea bottom, increasing turbidity, affecting fauna and flora (posidonia fields, for instance).

3a Do you face similar situations in your area?

Yes ☐No ☐

Explain

2

3b Does maritime traffic (and its very high economical value) constitute a limiting factor for the real implementation of the WFD?

Yes ☐

No ☐

Explain

?

The maximum mercury level present in biota, according to the WFD is 20 µm/Kg of wet weight. Threshold level for mercury in the European legislation on foodstuffs is 0,5 mg/kg of wet weight (Commission Regulation (EC) N° 466/2001 setting maximum levels for certain contaminants in foodstuffs), i.e. **the mercury threshold level in the WFD is 25 times stricter than in foodstuff legislation**, which for some experts this fact supposes an apparent incoherence. This gives an idea of the highly strict threshold levels of priority substances requested by the WFD compared to other levels.

4 Do you think regulation makes almost impossible to fulfill the requirements of the WFD?

Yes ☐

No ☐

Why?

?

5 Does the laboratory which makes the WFD analysis in your area count on the appropriate equipment and/or procedures for analyzing such strict levels of priority substances?

Yes ☐

No ☐

Why?

6 The suitable equipment for making appropriate analysis of priority substances is very expensive and unaffordable for many institutions. Even the new list of priority substances includes the determination of hormones in very tiny concentration in water. **Do you think there is any pressure or interest group involved in such highly restrictive threshold values set by the Water Framework Directive?**

Yes ☐No ☐

Why?

7 Do you think there is a coherent proportionality among the cost of implementation of the WFD and the real environmental benefit achieved?

Yes ☐No ☐

Why?

In certain regions, like Valencia Community, there are high environmental values (like coastal marshlands, coastal reservoirs, etc.), which are protected areas (Natura 2000), but they depend on the anthropic action in order to prevail (some of them have an anthropogenic origin). For instance, the Albufera of Valencia depends on the water returns from the irrigation activities

(agriculture). Moreover, some coastal marshlands are fed with water coming from agriculture and human activities. By contrast, the WFD considers water uses as anthropogenic pressures, but these uses not only create economic wealth but environmental and ecological wealth despite being semi-artificial areas.

8 Do you have similar examples of anthropogenic high-environmental value sites, like the Albufera, in your area?

Yes ☐

No ☐

9 Do you think in general the WFD is applicable in your region?

Yes ☐

No ☐

Why?

Regarding the WFD implementation, there are no particular difficulties encountered. Besides, this problematic of implementation is sometimes misunderstood. The Member States implement European Directives. The question for us would be more on the operational implementation of the WFD through the SDAGE (Schéma Directeur d'Aménagement des Eaux) and the programmes of measures, but again, at this stage, it would be better to challenge those who are directly dealing with the operational axis of the implementation, namely the masters of works, local authorities, industrialists, managers or even the State for the regulatory part.

10 Please, select one answer:

I think the Water Framework Directive is more a:

Solution ☐

Problem ☐

Other ☐

Explain

In France, Regions do not detain the competence to apply the WFD and have not a global vision of the cost/benefit ratio of its implementation. In the coastal zone, it is difficult to have a restitution of data with an integrate vision of the quality of waters in relation with the eventual source of pollution or problem. It would be useful to orientate the territorial management in a way that could favor the regional level for the implementation.