Draft work programme for the next CIS cycle 2019-2021

Eurelectric comments

September 2018

Eurelectric represents the interests of the electricity industry in Europe. Our work covers all major issues affecting our sector. Our members represent the electricity industry in over 30 European countries.

We cover the entire industry from electricity generation and markets to distribution networks and customer issues. We also have affiliates active on several other continents and business associates from a wide variety of sectors with a direct interest in the electricity industry.

We stand for

The vision of the European power sector is to enable and sustain:
- A vibrant competitive European economy, reliably powered by clean, carbon-neutral energy
- A smart, energy efficient and truly sustainable society for all citizens of Europe

We are committed to lead a cost-effective energy transition by:

investing in clean power generation and transition-enabling solutions, to reduce emissions and actively pursue efforts to become carbon-neutral well before mid-century, taking into account different starting points and commercial availability of key transition technologies;

transforming the energy system to make it more responsive, resilient and efficient. This includes increased use of renewable energy, digitalisation, demand side response and reinforcement of grids so they can function as platforms and enablers for customers, cities and communities;

accelerating the energy transition in other economic sectors by offering competitive electricity as a transformation tool for transport, heating and industry;

embedding sustainability in all parts of our value chain and take measures to support the transformation of existing assets towards a zero carbon society;

innovating to discover the cutting-edge business models and develop the breakthrough technologies that are indispensable to allow our industry to lead this transition.

WG Hydro
WG Environmental Protection

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Based on the set of questions presented at the meeting of the Strategic Co-ordination Group on 17 May 2018, Eurelectric would like to point out a few key issues that should be considered important and be raised in the framework of the discussion of the new work programme for the next CIS cycle 2019-2021. Eurelectric thanks the Commission for the work so far and is looking forward to being actively involved within the next CIS cycle.

Please find our answers to the questions below:

1. OBJECTIVES OF THE CIS

Q1. The current objectives of the CIS are broad and allow the CIS to work on both long and short term tasks. Do you agree that these objectives should be maintained also for the next period?

Yes, the long-term perspective is of intrinsic importance for a comprehensive issue such as water policy as any sustainable progress can only be evaluated in the long term. In addition, a focus on short term tasks is necessary in order to facilitate the implementation of the WFD. In this context, following questions might be relevant:

- Do the objectives for the CIS work include the review of WFD?
- How is climate change (CC) addressed in the CIS work?
- How will CC impact on water resources and water quality? How and where are these issues handled?
- Water Storage – will it need more attention due to CC?

Q2. Do you agree that the focus of the next CIS Work Programme should continue to move from the development of guidance to the exchange of good practices?

Yes, benchmarking stimulates the further development of scientific knowledge as well as of the development of mitigation measures. The efforts of the CIS work show that strict guidance may not always be the "right instrument" whereas the exchange of good practices has proven to support development and progress. However, showing good practice examples rather reflects the different character of hydro in Europe.

In addition, it has to be pointed out that currently there are already numerous guidance documents. As not all of them (e.g. identification of WBs) are very well in line with the WFD wording, they could even lead to unpractical implementation.

2. DURATION OF THE NEXT CIS WORK PROGRAMME

Q3. Given the current state of implementation of the WFD, associated Directives and Floods Directive, do you believe that three years is still the ideal duration of the next Work Programme? Would it make sense to bring the CIS Work Programme cycle in line with the cycle of implementation of the Directives, making the next Work Programme a 6-year programme? The Work Programme would start with the conclusions of the assessment of the 2nd RBMPs and 1st FRMPs and end with the conclusions of the assessment of the 3rd RBMPs and 2nd FRMPs.

This is a point at issue. It is hard to say whether a 6-year CIS work programme would be more appropriate.

Q4. The conclusion, in 2019, of the evaluation of the WFD and associated Directives and of the Floods Directive, may lead to the need to adjustment in these general objectives or in the details of the Work Programme. Similarly, if it is decided to have a longer duration for the next Work Programme, adjustments may be needed during its implementation. Do you agree that the Work Programme that will be adopted in November 2018 will need to be reviewed and, if necessary, modified regularly?

This is a point at issue. Stakeholders obliged to implement and finance mitigation measures need a clear and stable framework ensuring sustainable reliability. Potential modifications within the working period provide risks for delay in the implementation.

Q5. If regular reviews of the Work Programme, do you agree that these would be led by the individual Working Groups and Ad-hoc Task Groups and validated by the SCG and Water Directors?

Eurelectric sees this point critical. Reviewing one's own work might not lead to fundamental improvements. However, it is crucial that Ad-hoc Task Groups represent a wide range of MS and relevant stakeholders and that their work is transparent.

3. WORKING SETUP OF THE CIS

Q6. We currently have "permanent" Working Groups on Chemical, Data and Information Sharing, Ecological Status, Floods and Groundwater. Do you agree that these Working Groups should be kept in the next CIS Working Programme?

Eurelectric supports the suggestion to keep these WGs.

Q7. Three Ad-hoc Task Groups (ATGs) were established under the 2016-2018 CIS Work Programme, on Art. 4(7), Hydromorphology and Water Reuse. The ATG on Art. 4(7) delivered the guidance for which it was created. The work of the ATG on Hydromorphology has been run in close coordination with the work of the Working Group on Ecological Status. The TG on Water Reuse participated in the process that led to the upcoming Commission Proposal for a Regulation, but once this Regulation is adopted it is likely to lead to the need for new guidance documents, namely on risk assessment. Do you agree that the work of the ATG on Art. 4(7) can be considered as concluded, that the mandate of the ATG on Hydromorphology is integrated in the mandate of the WG on Ecological Status and that an extended mandate is given to the ATG on Water Reuse in the next Work Programme?

Eurelectric proposes to keep the WGs established under the 2016-2018 CIS Work Programme, on Art. 4 (7), active. This is due to the fact that even though a guidance has already been published, the issue of exemptions will remain one of the most relevant topics for MS in the further implementation.

Eurelectric agrees with the integration of the ATG on Hydromorphology into the mandate of the WG on Ecological Status. The TG on Water Reuse is crucial to address topics such as the efficiency of water use as well as sustainability in an expected warmer climate with more frequent water stress.

Q8. The work on water and agriculture has been done, over the current Work Programme, outside the framework of the CIS, to involve the agriculture authorities and stakeholders, in addition to DG AGRI. Do you think that this is still the best way to reach progress on the links between water and agriculture?

Eurelectric believes that it is crucial to link water and agriculture related topics. Agriculture is one of the most relevant stakeholders and its active participation in implementation will be important. Furthermore, there are even other stakeholder groups whose impact/ implementation duties have so far not been fully integrated into the CIS work, such as infrastructure or fishery. Eurelectric proposes to integrate these stakeholder groups as well.

Q9. Are there other topics for which you believe a Working Group or Ad-hoc Task Group would be necessary in the next Work Programme (e.g. financing of measures)?

Eurelectric would like to point out that especially financing is a crucial topic as it constitutes one of the most relevant obstacles in achieving success in the implementation of the WFD. Financing includes various issues, such as the funding of measures, weighing methods, and even the choice of supporting instruments to boost implementation of mitigation measures from stakeholders that have not been active yet.

Furthermore, Eurelectric proposes to tackle the following issues:

- presentation of the achieved results as some external stakeholders doubt the success of the WFD so far,
- better communication: at EU-level as well as at MS level in order to improve the reputation and to attract more attention possibly leading to more research in this field,
- to interconnect with the Commission's responsibles for e.g. rural development and innovation,
- to confront water resources with the topics of water scarcity and drought.

Eurelectric pursues in all its activities the application of the following sustainable development values:

Economic DevelopmeValentina SPINA

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Growth, added-value, efficiency

Environmental Leadership

Commitment, innovation, pro-activeness

Social Responsibility

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