

Brussels, 17<sup>th</sup> July 2006

To: Mr Mogens Peter CARL, Director General, DG Environment, EC

**Concerning: Complaint to the European Commission concerning failure of Austria, Belgium, Denmark, Estonia, Finland, Germany, Hungary, Ireland, Poland, Sweden and The Netherlands to comply with the provisions of the EU Water Framework Directive 2000/60/EC ("WFD") Article 5§1.**

Dear Mr Carl,

With this letter we would like to inform you that today the EEB and WWF on behalf of 17 environmental organisations have submitted a complaint to Secretary General Ms Day concerning the failure of 11 countries to comply with the provisions of the EU Water Framework Directive.

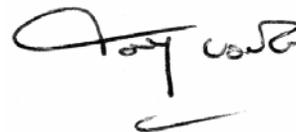
In May we published a survey about the quality of the economic elements of the 2005 national WFD implementation reports. Based on the findings, that in general environmental concerns are not integrated in the economic assessment, we have together with the involved NGOs decided to focus on a strategic element in the national WFD Article 5 Reports, the interpretation of what constitutes a "water service". We are concerned about a narrow interpretation, as Member States are only required to carry out an assessment of the recovery of costs for water services from users, including environmental and resource costs, and not for any other activity. Thus a careful identification of water services is the basis of providing adequate information and making a fair and transparent decision about who will pay for what to achieve sustainable water management. We identified those cases where countries have decided to apply in practice a very narrow interpretation, which we believe violates the definition and jeopardise the objectives of the WFD.

We call on you to support our complaint. All necessary steps should be taken to clarify the interpretation of what constitutes a water services and to correct wrong interpretations in 2008, before the programmes of measures are put in place in December 2009. Otherwise we are afraid that WFD implementation will neither be cost-effective nor bring us a step forward in making the market work for the environment.

Yours Sincerely,



John Hontelez  
Secretary General, EEB



Tony Long  
Director, WWF EPO

Annex: Collective NGO Complaint to European Commission from 17 July 2006