



FEPORT Feedback on the proposal for a Directive on Integrated Water Management

1. Introduction

FEPORT represents the interests of 1225 private port companies and terminals performing cargo handling and logistics related activities in European seaports. FEPORT members employ more than 390.000 port workers and have invested more than 56€ billion in equipment (superstructure), training and intermodal solutions over the last 10 years.

On the 26th of October, 2022, the EU Commission issued a [proposal](#) for a Directive on Integrated Water Management.

Through this paper, FEPORT, which represents the interests of 1225 private port companies and terminals performing cargo handling and logistics related activities in European seaports, would like to give its feedback regarding the Integrated Water Management Directive proposal, in particular regarding those elements impacting port connectivity and navigability of the inland waterways.

The Directive proposal amends a number of water related directives already in place, namely:

- Directive 2000/60/EC establishing a framework for community action in the field of Water Policy (**Water Framework Directive**)
- Directive 2006/118/EC on the protection of groundwater against pollution and deterioration (**Groundwater Directive**)
- Directive 2008/105/EC on environmental quality standards in the field of water policy (**EQS Directive**)

With the Directive, the Commission is proposing to **update the lists of water pollutants** to be more strictly controlled in surface waters and groundwater.

The proposal also updates and introduces Environmental Quality Standards (EQS) for a number of substances to be found in sediments.

2. The EQS introduced for sediments containing tributyltin (TBT)

FEPOR agrees that the Directive should include Environmental Quality Standards for sediments as it requires Member States to improve water quality, but is regarding the EQS introduced for TBT in sediments.¹

Until 2008, when an international ban was introduced, TBT was used for the **anti-fouling paint of ships**. However, although TBT is harmful for the environment, it is also degraded in the environment meaning that the levels of TBT have been decreasing since 2008.

Yet, although TBT levels are decreasing, some sediments in Europe's fairways, also around ports, still contain TBT. This means that dredging works might be jeopardized as dredging in this case means removing sediments considered as polluted from one part of the water environment and relocating it to another.

At the same time, dredging works are crucial to ensure the navigability of Europe's inland waterways as well as port connectivity. FEPOR is therefore concerned that the inclusion of the EQS for TBT in sediments could frustrate a number of policy goals as laid down in the Green Deal and the sustainable and smart mobility strategy which lay down ambitious targets for modal shift to clean modes such as IWT transport. In addition, dredging is crucial to ensure port connectivity and thereby the completion of the core TEN-T network.

FEPOR acknowledges the [SCHEER advice](#) to include TBT and its validity from an environmental perspective, but stresses that it overlooks economic aspects or impacts on the transport sector, and thereby also fails to acknowledge how modal shift and enhanced port connectivity can contribute to the decarbonization of transport.

3. Conclusion

FEPOR supports the Integrated Water Management Directive proposal and its stricter targets and update of the lists of water pollution. However, when assessing EQS introduced for TBT in sediments, also the impact on dredging works and the role dredging places in ensuring navigability and port connectivity should be taken into account.

In addition, when introducing environmental quality standards for TBT, it should be considered that since the international ban in 2008, its levels in the environment have already been decreasing.

¹ See p.18 of [Annex V](#) of the EU Commission proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL amending Directive 2000/60/EC establishing a framework for Community action in the field of water policy, Directive 2006/118/EC on the protection of groundwater against pollution and deterioration and Directive 2008/105/EC on environmental quality standards in the field of water policy