

EuSalt Position on the Blueprint to Safeguard Europe's Waters

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EuSalt welcomes the European Commission's '[Blueprint to Safeguard Europe's Waters Resources](#)' that aims to improve water efficiency and ensure the sustainability of all activities that impact on water. EuSalt agrees that working towards better, consistent implementation of existing EU legislation and increased integration of EU sectoral policies is a good way to achieve good status of water bodies in Europe. Also we fully share the Commission's point of view setting river basin as the most relevant scale for action in order to respect the European diversity.

EuSalt values the European Commission's assessment that highlighted several options aiming to ensure a better implementation of the Water Framework Directive. Among options retained, three deserve particular attention from a salt industry point of view.

1. Water efficiency targets or life cycle approach?

Water efficiency is necessary to a sustainable use of resources as well as to ensure water availability for all. Also it holds opportunities for industry. However, establishing targets for water might conflict with other EU policy requirements, namely regarding energy, and future instruments related to resource efficiency. Ensuring a practical and workable integrated policy for resource efficiency requires a life cycle approach.

2. The risks of a water trading scheme

Resorting to economic instruments such as trading schemes to highlight the value of water might not be the most appropriate due to particularly disadvantageous side effects. Even on a voluntary basis, a trading scheme will distort competition on the Single Market for it will not be applied by all Member States. It may as well be proved imperfect given that it would not take into account positive contributions to the environment and discourage businesses to work in that direction.

3. Enhancing the protection of water ecosystems

EuSalt believes that water ecosystems deserve particular attention. Sustainable activities that contribute to the protection of biodiversity and water ecosystems need to be valorised and supported by European initiatives and policies. Solar salt works represent one of these activities, as well as old mining sites often provide favourable ground for biodiversity rehabilitation projects.

1. Water efficiency targets

EuSalt believes that water efficiency is essential in order to release pressure from water bodies while maintaining a good level of industrial activity. With this aim in view, the salt industry encourages the optimisation of the water cycle through the re-use and recycling of water, where possible. Companies can easily and quickly invest in such practices extending the life cycle of water. Setting water efficiency targets, on the other hand, could weigh further constraints on economic activities and conflict with the need for better integration of EU policies.

Water efficiency targets need to be connected with other EU policies and initiatives aiming to use the same tool in order to ensure their applicability. In accordance with the EU 2020 Strategy, which foresees saving 20% primary energy by 2020, the Energy Efficiency Directive already imposes energy efficiency targets on Member States, and industry subsequently. Furthermore, following the 'Roadmap to a Resource-Efficient Europe' the Commission will come up with indicators measuring resource efficiency – for minerals, metals, carbon, land, water.

As industry we fear that establishing efficiency targets for the different resources might result in a very complex, unworkable system that would hamper economic activity rather than making it more sustainable. From our point of view effectively integrating EU policies calls on for a life cycle approach being applied. In so doing we would look at the general impact of products and liaise with the various parameters involved in their life cycle: environmental impact, energy and water consumption, carbon emissions, and land use. All parameters can rarely be improved at the same time. Even more, achieving better water efficiency could imply more energy consumption. For instance, re-using and recycling waste water for industrial purposes might require a certain cleaning procedure that would be avoided by using clean water from the grid.

For this reason EuSalt warns against hidden facts and conflicting instruments such as efficiency targets applied in different policies with insufficient coordination. Integration of policy areas also pleads for a life cycle approach.

2. The risks of water trading scheme

The Blueprint to Safeguard Europe's Water Resources concludes to the relevance of economic instruments in tackling water-related challenges. More precisely a voluntary guidance for water trading schemes was retained as one of the best attempt to put a price on water.

Although EuSalt understands the rationale underlying water economics, it is doubtful that such a system could work towards better water efficiency. Even at river basin level a water trading scheme holds promises for inequalities and unlevel playing field for businesses as revealed under the EU Emissions Trading Scheme. There are different reasons to this concern.

Firstly, the decision whether or not to implement a water trading scheme will be left to the Member States' discretion. This paves the way for unequal treatment of water users from one country or region to another. Indeed, implementing a trading scheme would impose additional costs on businesses and subsequently increase production costs. This negative impact was attested under the EU ETS as industry saw its production costs rising and underwent a significant loss of competitiveness on the global scene. A water trading scheme would be even more pernicious for it would distort the Single Market and force relocations of activities to a certain extent.

Secondly, such taxation system often turns out to be excessively complex and cause 'significant administration costs'. It would be increasingly burdensome as well, if it would fail to take into account efforts made by companies to minimise their general impact on the environment.

For this reason, EuSalt is convinced that all policies aiming at improving efficiency and reducing industrial impact on the environment should follow a life cycle approach. The whole life cycle of a product or an activity needs to be taken into account in a fair, inclusive way, e.g. by looking at the different resources it has an impact on at the same time. We also trust that incentives would provide for better achievements than taxation and set a favourable background for investments and innovation.

3. Enhancing the protection of ecosystems

EuSalt welcomes the aim of the Blueprint to reinforce the protection of water ecosystems as long as it does not counteract with economic activities – whether artisanal or industrial – that support or even create biodiversity. As a matter of fact some activities such as solar salt works provide a favourable setting for specific flora and fauna in coastal areas and inland wetlands. Not only do solar salt works produce salt, but they are also accepted and recognised ecosystems. Likewise mining sites can be the home for new, restored biodiversity once extraction has ceased.

Several LIFE and Natura 2000 projects are taking place in both salt works and old mining sites. It is therefore essential that the Blueprint provides a supportive framework for such positive contribution to biodiversity.

EuSalt is a non-profit organization representing the common interests of salt producers located across Europe. The production of salt in Europe is estimated at 68 million Tonnes, which represents nearly a third of the worldwide production. The vast majority of the salt produced is dedicated as primary source material in the production of many chemical industrial applications of which the production of Chlorine and Soda Ash are the largest applications.

