

Feedback from European Marine Board to European Commission's [Bathing water quality – review of EU rules \(8 March 2021\)](#)

The European Marine Board (EMB) Secretariat support and welcome the aims of this review.

We stress the importance of considering bathing water quality within the wider context of the zero pollution ambition and in connection with other relevant EU Directives. Our soil, inland waters and Ocean are all interconnected: a pollutant entering the system via soil or fresh water can flow through the system into downstream inland waters and/or the Ocean. It is therefore critical to take a holistic view of pollutants, aiming where possible to address them at their source. Reducing or removing the influx of pollutants in one medium will also prevent them flowing through the system and improve conditions in another. This will also have a naturally beneficial impact on biodiversity and ecosystem health, which are key drivers to ensure resilience of coastal areas to the impacts of climate change, e.g. sea-level rise and warming. There are additional associated benefits, e.g. an increase in food safety (fish and shellfish) as a result of reduced cumulative pollutant loads on species in different habitats along the chain.

Bathing waters are a common good that should be seen as a benefit for all (e.g. recreational users, residents, workers), not just tourists. We are seeing temperature increases in many areas as a result of climate change, with heatwaves becoming more frequent and severe. It is natural for people to seek bathing areas as a means to cool down. It is therefore critical to ensure that all areas where bathing is possible are identified as such, and are monitored and maintained to the same standards, including those in urban areas. This will ensure equality in the protection afforded to all users of all bathing waters. Therefore, we support the phasing out of the “sufficient” classification or modification of applicable standards.

As noted in the consultation, bathing waters are often used by recreational users all year round, rather than being restricted to the traditional bathing season. It is therefore critical to monitor bathing water quality year-round. The ability to demonstrate safe bathing waters in the off-season may also boost year-round tourism, which could provide additional economic benefits if appropriately managed.

At present, the Directive only requires monitoring of two faecal bacteria parameters, which while important, does not adequately address additional parameters for existing or emerging pollutants that are harmful to human health, and for which appropriate indicators and testing procedures have been developed. We would support the inclusion of additional parameters within this revision and a regular programme of Directive revisions to enable the addition of parameters in future.

Finally, although digitalization and EU space services are quite efficient at measuring and reporting on many parameters, it is not clear how these can be used to help with monitoring the current parameters on faecal bacteria or possible new parameters e.g. microplastics. We therefore encourage consideration of all options including citizen science. This could be a means to gather additional data and information from the relevant stakeholders (e.g. residents, recreational users, workers, tourists, tourism operators) to supplement official monitoring data gathered by Member States, over wider geographical and temporal scales. This can be coupled with improving water quality literacy and

awareness. Within the scope of the H2020 Project SOPHIE (Seas, Oceans and Public Health in Europe, 2017-2020), a pilot citizen science project was launched with ecotourism operators to map *Ostreopsis* outbreaks in Europe, which successfully demonstrated the potential of citizen science in such applications. There is more about this work online (<https://sophie2020.eu/activities/citizen-science/>).

The position of the EMB Secretariat does not necessarily reflect that of its members.