

■■■■■ (SPF Santé Publique - FOD Volksgezondheid)

From: ■■■■■@envcoord.health.fgov.be on behalf of ■■■■■ <■■■■■@vmm.be>
Sent: mardi, 28 novembre 2023 14:49
To: ■■■■■ (SPF Santé Publique - FOD Volksgezondheid)
Cc: ■■■■■@envcoord.health.fgov.be
Subject: ■■■■■ RE: Council of the European Union - Delegates Portal: Community document(s) registered between November 13, 2023 00:01 and November 20, 2023 00:01

Dear ■■■■■

I suppose your reaction is based on the following comment in the Belgian position

b) Discussion with MMSS the following topics:

1. PFAS:

Considering consistency with DWD and efficiency, *should the parameter "Per- and poly-fluorinated alkyl substances (PFAS) - sum of 24" be change to "Sum of PFAS" as is set in DWD?*

Therefore, should it be changed the QS from 0.0044µg/L, expressed as PFOA-equivalents, to 0.1µg/L as is set at DWD.

BE COMMENT/PROPOSAL

We support the adoption of science-based quality standards, but they should also be harmonized across different legislative initiatives. However, the lack of this alignment is problematic for PFAS. We recognize that the recent work published by EFSA put into question the current value included in the DWD. But to our opinion, there remains a lack of scientific evidence regarding the use of the value of 4,4 ng/l from the EFSA-study applied as QS for the sum of 24 PFAS expressed as PFOA-equivalents. It seems to us impossible to explain to the public that there is no problem drinking tap water with a concentration of 100 ng/l of PFAS, but that the same water should not be discharged nor infiltrated because it can cause deterioration of the environment. (pollution of groundwater or surface water).

The message we tried to give is that

- We are in favor of science based EQS
- We note that much higher EQS are applicable in the drinking water directive
- The scientific information on the derivation of the value of 4.4 ng/l for the sum of 24 PFAS expressed as PFOA-equivalents is missing in the Commission documents
- We see a 'communication problem' when we have to explain that the EQS set for the environment is much stricter than for human health
- We believe there is currently a discrepancy between 2 legislative texts from the Commission

To be clear, we did not plea to set the EQS for groundwater at 100 ng/l, but we wanted to draw the Commissions attention to the fact that the discrepancy exist.

The Commission admits that the EQS in the drinking water directive is outdated, but we see no initiative from the Commissions side to review de drinking water directive.

If you need more information on the discussions we had within the group on this subject, please contact [REDACTED] [REDACTED]
[REDACTED] He is the sub-pilot for groundwater for this file.

[REDACTED]
[REDACTED]
[REDACTED]
VLAAMSE MILIEUMAATSCHAPPIJ

[REDACTED]@vmm.be



Van: [REDACTED]@envcoord.health.fgov.be <owner-[REDACTED]
[REDACTED]@envcoord.health.fgov.be> **Namens** [REDACTED] [REDACTED] (SPF Santé Publique - FOD
Volksgezondheid)

Verzonden: dinsdag 28 november 2023 11:22

Aan: [REDACTED]@envcoord.health.fgov.be

Onderwerp: [REDACTED] RE: Council of the European Union - Delegates Portal:
Community document(s) registered between November 13, 2023 00:01 and November 20, 2023 00:01

Chers collègues,

Au vu de l'actualité en Wallonie pour les PFAS, nous nous posons, au SPF Environnement (service REACH), les questions suivantes en relation au document en annexe (daté du 14/11) et en particulier sur la position belge qui y est exprimée :

- n'est-il pas logique de fixer la qualité des eaux souterraines à un seuil bas (plus bas que pour l'eau potable) afin de pouvoir encore effectuer si nécessaire des mélanges d'eaux comme c'est le cas actuellement afin de repasser sous les 100ng/l dans l'eau potable ?
- comment un seuil de 100ng/l dans les eaux souterraines peut-il être compatible avec un seuil de vigilance de 30ng/l comme proposé en Wallonie ?
- pourquoi la position belge semble-t-elle dire que le problème de santé (norme de l'EFSA) et les concentrations dans l'eau souterraine sont deux problèmes distincts, en disant que les eaux souterraines seraient une question environnementale ? Il nous semble qu'une des principales justifications des seuils dans les eaux souterraines est la protection de la santé humaine (eau potable).
- quelles conséquences aurait une situation où les eaux souterraines seraient à terme à 100ng/l, et que donc une épuration à charbon actif s'avèrerait nécessaire de manière généralisée ? (sans compter que les courtes chaînes seraient peu retenues par ces filtres).

Bien cordialement,



Santé publique
Sécurité de la Chaîne alimentaire
Environnement

[REDACTED]
[REDACTED]
[REDACTED]@health.fgov.be

From: [REDACTED]@envcoord.health.fgov.be <owner-[REDACTED]@envcoord.health.fgov.be> On Behalf Of [REDACTED] - Belgium - Brussel EU
Sent: lundi, 20 novembre 2023 15:16
To: [REDACTED] <[REDACTED]@vmm.be>; [REDACTED]@envcoord.health.fgov.be
Subject: [REDACTED] FW: Council of the European Union - Delegates Portal: Community document(s) registered between November 13, 2023 00:01 and November 20, 2023 00:01

USAGE INTERNE - INTERN GEBRUIK

FYI - les commentaires des EM.

From: [REDACTED]@consilium.europa.eu <[REDACTED]@consilium.europa.eu>
Sent: Monday, 20 November 2023 00:06
To: [REDACTED] - Belgium - Brussel EU <[REDACTED]@diplobel.fed.be>
Subject: Council of the European Union - Delegates Portal: Community document(s) registered between November 13, 2023 00:01 and November 20, 2023 00:01



DELEGATES PORTAL

Community notification

Document(s) registered
between November 13, 2023 00:01 and November 20, 2023 00:01

Documents that have been published recently

Working Party on the Environment

L WK 14878 2023 INIT

[Priority Substances in Water: Follow-up to the VTC of the members of the WPE on 25 October 2023 - comments from delegations](#)

Original Language: EN Language: EN

Acronyms: ENV; CLIMA; AGRI; FORETS; ENER; TRANS; CODEC;

Interinstitutional code(s): 2022/0344(COD);

Documents that have been linked to meetings of your communities

Working Party on the Environment

P ST 11566 2023 INIT

ENVIRONMENT | (06/10/2023); INFORMAL VTC
ENVIRONMENT | (27/07/2023); ENVIRONMENT |
(20/11/2023); ENVIRONMENT | (16/11/2023);

[Proposal for a DIRECTIVE OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL on Soil Monitoring and Resilience \(Soil Monitoring Law\)](#)

Original Language: EN Language: EN

Acronyms: ***; RECH; FORETS; ENV; CODEC; CLIMA; AGRI; TRANS; ENV/821; CLIMA/345; AGRI/381; FORETS/79; RECH/341; TRANS/301; CODEC/1,309;

Interinstitutional code(s): 2023/0232(COD);

P ST 11566 2023 ADD 1

ENVIRONMENT | (06/10/2023); INFORMAL VTC
ENVIRONMENT | (27/07/2023); ENVIRONMENT |
(20/11/2023); ENVIRONMENT | (21/11/2023); ENVIRONMENT
| (16/11/2023);

[ANNEXES to the proposal for a Directive of the European Parliament and of the Council on Soil Monitoring and Resilience \(Soil Monitoring Law\) \[...\]](#)

Original Language: EN Language: EN

Acronyms: ***; RECH; FORETS; ENV; CODEC; CLIMA; AGRI; TRANS; ENV/821; CLIMA/345; AGRI/381; FORETS/79; RECH/341; TRANS/301; CODEC/1,309;

Interinstitutional code(s): 2023/0232(COD);

P CM 5202 2023 REV 1 Removed from agenda

ENVIRONMENT | (17/11/2023); ATT. & EXP. ENVIRONMENT |
(14/11/2023); ENVIRONMENT | (13/11/2023); ENVIRONMENT
| (14/11/2023);

[Working Party on the Environment](#)

Original Language: EN Language: EN

Acronyms: ENV;

L WK 12853 2023 ADD 1

ENVIRONMENT | (06/10/2023); ENVIRONMENT |
(16/11/2023);

[Soil Monitoring Law Directive: Follow-up to the WPE on 6 October 2023 – Commission presentations](#)

Original Language: EN Language: EN

Acronyms: ENV; CLIMA; AGRI; FORETS; RECH; TRANS; CODEC;

Interinstitutional code(s): 2023/0232(COD);

P ST 14265 2022 ADD 1

ENVIRONMENT (SUITE 2/2) | (11/11/2022); INFORMAL VTC
ENVIRONMENT | (25/10/2023); ENVIRONMENT COUNCIL |
(20/12/2022); ATT. ENVIRONMENT | (12/06/2023); INFORMAL

VTC OF THE MEMBERS OF THE WP ON ENVIRONMENT | (27/09/2023); VTC INF.ENVIRONMENT | (22/11/2023); ENVIRONMENT COUNCIL | (20/12/2022); ENVIRONMENT | (12/06/2023);

[ANNEXES to the 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](#)

Original Language: EN Language: EN

Acronyms: ***; FORETS; ENV; ENER; CODEC; CLIMA; AGRI; TRANS; ENV/1,092; CLIMA/558; AGRI/600; FORETS/110; ENER/553; TRANS/677; CODEC/1,645;

Interinstitutional code(s): 2022/0344(COD);

P ST 14265 2022 INIT

ENVIRONMENT (SUITE 2/2) | (11/11/2022); INFORMAL VTC ENVIRONMENT | (25/10/2023); ENVIRONMENT COUNCIL | (20/12/2022); ATT. ENVIRONMENT | (12/06/2023); INFORMAL VTC OF THE MEMBERS OF THE WP ON ENVIRONMENT | (27/09/2023); VTC INF.ENVIRONMENT | (22/11/2023); ENVIRONMENT COUNCIL | (20/12/2022); ENVIRONMENT | (12/06/2023);

[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](#)

Original Language: EN Language: EN

Acronyms: ***; FORETS; ENV; ENER; CODEC; CLIMA; AGRI; TRANS; ENV/1,092; CLIMA/558; AGRI/600; FORETS/110; ENER/553; TRANS/677; CODEC/1,645;

Interinstitutional code(s): 2022/0344(COD);