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Till: [Arvid Palmkvist](#)
Ärende: WP Environment 31/5 - Water pollution - Call for a swift adoption of the updated list of pollutants
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[Position Paper - French Shellfish Farming sector - List of water pollutants and EOS - FINAL.pdf](#)

Dear Mr Palmkvist,

Ahead of discussion tomorrow morning on the Commission's proposal to update the lists of priority pollutants of surface and groundwater, we would like to urge you to **ensure a swift adoption that adequately updates the water legislation to protect aquatic ecosystems, animal health and human health without undermining fundamental provisions of the Water Framework Directive.**

About shellfish farming

The French National Shellfish Farming Committee (*Comité national de la conchyliculture – CNC*) is the interprofessional association representing the French shellfish breeders, processors and distributors. France is Europe's leading shellfish producer, with an annual value of over 500 million euros. At European level, the shellfish farming sector represents an annual production worth 1170 million euros, and more than 50% of aquaculture production.

Shellfish farming is a form of aquaculture that consists in rearing molluscs such as oysters, mussels, cockles, clams, etc. in open marine environments, generally in shallow areas. This type of aquaculture is 100% natural, with no inputs or medication, and provides several ecosystem services such as reducing water turbidity through its filtration, absorbing nitrogen which limits the risk of algal bloom, habitats creation and local biodiversity increase, as well as carbon sequestration.

Shellfish as sentinels of water pollution

Bivalve molluscs filter water, feed from nutrients present in the water and act as bioindicators of the concentration of pollutants in a body of water. At the same time, by accomplishing their biofilter role, **they are however vulnerable to harmful substances accumulation that can compromise their viability, their growth and/or their hygienic-sanitary quality.**

Chemical contaminants such as dioxins, polychlorinated biphenyls, heavy metals (particularly lead, mercury, cadmium and arsenic) and polycyclic aromatic hydrocarbons, as well as micro and nanoplastics, from the surrounding waters are also problematic for shellfish health and their sanitary quality. We also know that PFAS are accumulated in bivalve molluscs and maximum levels in these food products have been defined. **It is essential to ensure pollution reduction in the aquatic environment where these shellfish are grown.**

Climate change increases pressures on water and aquatic life with changes in temperature, precipitations, ocean acidification, hypoxia incidence and prevalence and sea levels. Effects are already seen in shellfish production areas and **only reinforce the need for greater and faster chemical pollution reduction and regular updates of the list of pollutants and corresponding environmental quality standards.**

We call on you to...

- Avoid further delay in the adoption of this modifying Directive, ensure that new lists of EU water pollutants and their associated standards, considering the effect of **chemical mixtures, are adopted before the Member States start planning measures under the next cycle of River Basin Management Plans** in 2025 and **minimise derogation possibilities.**
- To **reject the proposed modifications on non-deterioration obligations** (WFD art 4) as these fall outside of the scope of the mandate of the ongoing update of the Directives and would weaken one of the core obligations under the WFD.

Please find attached the position paper of the French Shellfish Farming Committee for more information.

Thank you in advance for your consideration,

Sincerely,

| Julie ALEKSANDROVA

**COMITÉ
NATIONAL
DE LA
CONCHYLICULTURE**

About the CNC and EU policies : click [here](#)
EU Transparency register: 927325533716-39

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