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European Commission
DG ENV UNIT C.2 - MARINE ENVIRONMENT & WATER INDUSTRY

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Datum
1.4.21

Bathing water quality – review of EU rules
COMBINED EVALUATION ROADMAP/INCEPTION IMPACT
ASSESSMENT

Here: Possible inclusion of water sports in the EU Bathing Water Directive

Dear Sir or Madam,

We appreciate the Commission's efforts to ensure good bathing water quality for public health.

Already in the run-up to the last amendment of the EU Bathing Water Directive from the year 2006, it was under discussion to apply the criteria not only to bathing waters, but also to waters used only for water sports.

In 2006 this topic was averted, but in view of your comments on the target group in the current roadmap, we assume that this will now be discussed again.

We would like to point out that water sports such as sailors, canoeists, rowers and partly also divers have a different vulnerability and contact with the water than bathers. A transferability of the quality standards, which are appropriate for bathers, is therefore not possible.

Clean bathing waters are highly desirable for recreational use. Water sports enthusiasts notice irresponsible use of water, we take responsibility for our waters and are involved in Germany in countless projects for the protection of water! We accept comprehensible bans for nature conservation reasons. There are more than 1000 of these bans every year in Germany alone.

Possible further bans for reasons of inferior bathing water quality are not acceptable to us (but if we are included in the target group, this would be the consequence of poor water quality). Bans for those reasons would lead to increased use of the few naturally clean areas for water sports and would have a very negative impact on these areas due to increased usage pressure on nature.

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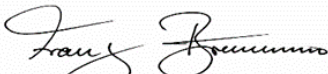
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We would like to see a consistent approach to the reasons for water pollution, and we will always provide our support for the goal of good water quality. But the target group should not be extended and generalized, water sports are very different from bathing and the exposure to water is very different among the various sports.

In case further information might be of help, do not hesitate to contact us.

With best regards,



Prof. Franz Brümmer
1. Vorsitzender



Ulrich Clausing
stv. Vorsitzender