

1. The European Policy on Water¹

From the EU Water Framework Directive to the Plan to safeguard Europe's Water Resources

The EU remained “blocked” compared to the initial plans developed in the Sixties regarding the European integration. The initial plans aimed at creating a real Union (not anymore “Community”) founded on a European Single Market and Currency (flexible as to the participation of Member States). The EU has not succeeded, to this day, in providing itself with supranational political powers to manage economy, welfare, finances and foreign policy (including foreign trade).

Result: the EU policies, in order to be recognised and approved by Member States, tend always more to fall back on economic and legal-economic elements (costs, benefits, opportunities, growth, competition, organisation of the markets, competitiveness, financing, etc...) and, in this way, they legitimate the economic mechanisms of the Single Market.

For what concerns environment, in the last ten years, the concept of “European common policy” has passed through a reductive evolution: the adjective “common” (as well as “community”) has almost disappeared from the EU dictionary. It has been replaced by the idea of policy defined and managed on the basis of partnerships with stakeholders (“parties prenantes”, in French) to realise shared projects. The EU decisions are always more similar to intergovernmental treaties with the change that the signing parties are not only States, but stakeholders of different nature, public, private or mixed-ownership (including Member States, Regions, local communities, etc...) The stakeholders participate by cooptation and, “formally”, on equal basis. This point is important and it is worth remembering because, according to the official declarations of the European Commission, the second important objective of the WFD is to promote the *citizen participation* (Art. 14). The slogan used by the European institutions in order to describe the spirit and the aim of the Directive was “Getting Europe's water cleaner. Getting the citizens involved”.²

As already said, the WFD established that by 2015 all Member States shall achieve a good ecological status of their water resources. To this purpose, the Directive introduced another key principle of the EU political vision in the field of water, namely the hypothesis that river basin districts (constituted by one or more basins) shall be the base unit on which organising water management (Art. 3 par. 1) and the obligation for States to submit by 2009 their “river basin management plan”. The Directive establishes that river basin management plans shall be implemented by 2012. According to the agenda set by the Directive, the year 2013 is dedicated to the assessment of progress made and possible solutions in order to ride out and remove the obstacles that impede the achievement of the main objective by 2015.

It is how the Plan to Safeguard Europe's Water Resources was born. It is also known as The Water Blueprint.³

2. The EU policy on water according to the Water Blueprint

¹ Extract from: REGIONAL PUBLIC HEARINGS ON THE WATER - First Hearing "The European issues in a global context,"

² <http://ec.europa.eu> of 21 September 2012.

³ Communication of the European Commission on “A Blueprint to Safeguard the Europe's Water Resources” COM (2012) 673 final of 14 November 2012.

2.1 What is the Water Blueprint

The Water Blueprint doubtless is the most important political document proposed by the European Commission in the field of “water management” after the WFD. It was conceived as the key instrument to plan the programmatic basis of the EU decisions facing water problems until 2030. In fact, following the very limited progress made in implementing the Directive during the first ten years, the EU decided to postpone the deadline for the achievement of the objective from 2015 to 2027. It means that, if the EU Council of Ministers and European Parliament approve the proposals contained in the Blueprint, the EU policy on water will be already defined until 2030 and it may be difficult to change it before this deadline.

The Water Blueprint has the same thematic structure of the Directive. The first pages focus on land use. The Commission is very clear: data show an alarming increase of environmental degradation despite the progress made. According to the studies conducted by the European Environment Agency, in 2010 the good ecological status was achieved only in 43% of waters. This is expected to increase to 53% by 2015. The Commission’s document affirms that “the ecological and chemical status of EU waters is threatened, more parts of the EU are at risk of water scarcity and the water ecosystems (...) may become more vulnerable to extreme events such as floods and droughts”. This situation leads the Commission to analyse in detail the double issue of the vulnerability of the Europe’s water resources vis-à-vis the unpredictable effects of climate change (floods and droughts) and the increasing scarcity of the EU water. According to the Commission, the phenomenon of water scarcity is doomed to intensify, water has become and it will remain a rare and scarce resource.

Among the main causes determining the failure of the objective 2015, the Blueprint includes:

- The inadequate and insufficient knowledge of water resources, water flows, water balances and the interaction of various elements in all phases of the long hydrologic cycle. For this reason, the Commission underlines the worth of research, innovation and technology and the importance to improve the interconnection between science and policy-makers;
- The limited support to the implementation of the Directive by Member States in terms of monitoring of waters’ chemical status, measures against excessive use, leakage from water distribution networks, phenomena of pollution and contamination and poor investments in “green infrastructures”;
- The ineffective application of economic instruments in water planning and management, that is to say the ineffective application of the principles declared in Art. 9 on water price (“full recovery cost”, “the consumer pays” and “the polluter pays”). According to the Commission, the failure to implement an efficient pricing system in a rigorous, consistent and extended manner should be considered one of the main causes of water inefficiency problems in the EU.
- A poor water governance (public participation based on the involvement of stakeholders);

2.2 The objectives of the Plan: the pillars of its programmatic structure.

The Safeguard Plan reaffirms the same inspiring principles, rules and intervention tools proposed by the WFD. Firstly, indeed, the Plan affirms that there is no need to modify the existing legislative instruments (no revision of the Directive). The objective “to ensure the sustainability of all activities that impact on water, thereby securing the availability of good-quality water for sustainable and equitable water use” (p. 4) remains unchanged. For the drafters of the Plan, the major problem is to remove the obstacles that so far have impeded the effective implementation of the Directive. For this reason, according to the European Commission, the most important function of the Plan is to strengthen the regulatory and programmatic dimension of rules and instruments of the Directive and to better organise the European cooperation between States and stakeholders so that Member States can fulfil their obligations.

The analysis of the ideological pillars on which the analytical structure and the propositional architecture of the new Commission’s document are built highlights the full adhesion of the Plan to the inspiring principles, rules and intervention tools of the Directive. Like all the other main actors of the European system, the Commission develops its strategy starting from the inevitable persistence and worsening of water scarcity and water conflicts in the future, as it was already described in the first section. The Plan talks about “worrying trends showing the increase and wider spread of **water scarcity and stress**, which is expected to affect in 2030 about half of EU river basins.” (p. 11)

To respond to this, the Commission proposes two series of measures: first, implementing pricing policies providing an incentive to use water efficiently. The Commission says that it needs to put “the right price on water” even because “not putting a price on a scarce resource like water can be regarded as an environmentally-harmful subsidy.” (p. 11) Second, “fostering water efficient technologies and practice. These water efficiency measures fit into the overall resource-efficiency objective of Europe 2020.” (p. 11)⁴

An important point to understand the ideological and political roots of the Plan is the explicit placement of water strategy in the “Strategy Europe 2020”, which is focused on the economic growth and energy problem and, in general, on the use of the European resources. It is also easy to understand the important role assigned to innovation and technology and, first of all, to knowledge. Knowledge is interpreted not only as knowledge of water resources in natural and physical terms, but also as knowledge of water balances and accounts (p. 12). According to the Plan, the water accounts “provide the ‘missing link’ in many river basins for water management” and, moreover, “water accounts fill the gap by bringing together knowledge that so far was only available in a scattered and piecemeal manner.” (p. 12)

For what concerns innovation and technology, it is redundant to remind that, in the European Commission’s culture, innovation has become the ideological “pass” for all Member States, business and financial world, as the term “competitiveness” has been since Eighties. In the name of innovation for competitiveness, all proposals become “politically correct” and therefore realistic, possible. It is meaningful that the European Innovation Partnership on Water (EIP-Water) was approved few days after the publication of the Plan and presented by the Commission as the main driving force supporting the implementation of the Plan’s objectives by 2027-2030.⁵

⁴ Communication from the Commission on “Europe 2020. A Resource Efficient Europe” COM (2011)21 and Communication from the Commission “Roadmap to a Resource Efficient Europe” COM(2011) 571.

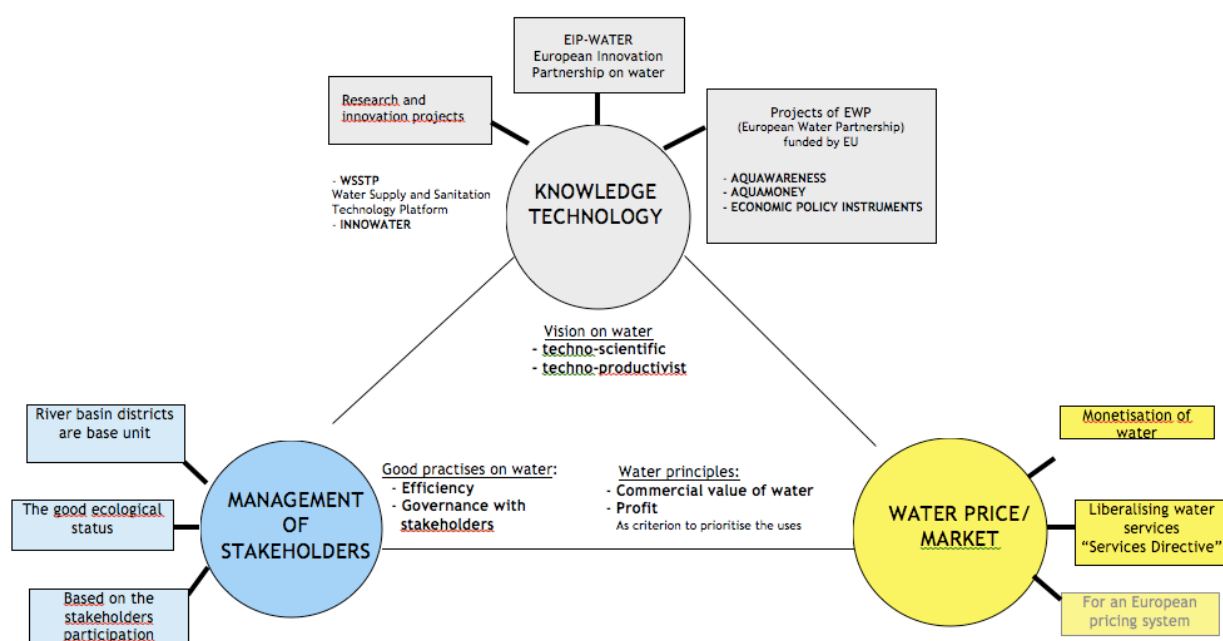
⁵ Communication of the Commission on the “European Innovation Partnership on Water” COM (2012)216 of 10th May 2012.

From this perspective, it is also clear the choice of the Commission to consider, especially in the last ten years, the stakeholders' participation (mostly from industrial and financial world) as critical condition to implement the Plan. This position stems from the double hypothesis (partially contestable) according to which: a) the most important techno-scientific and managerial knowledge is a prerogative of enterprises, especially private enterprises; b) financial resources needed to invest in innovation are located in capital markets and largely depend from private investments. For this reason, the several advisory and steering Committees created by the Commission in the field of water have a large majority of stakeholders' representatives from the industrial and financial world.

The definition of water, given by the European Commission in the first line of the document, is the following: "Water is essential for human life, nature and the economy." Doubtless, including the reference to "economy" aims at pointing out the nature of the resource the Commission is referring to, that is a "productive" resource, belonging to the "economic sphere". This concept is in line with the prevailing opinion considering economy as science and management practice of resources and means available to optimise production, accessibility and consumption of products and services which are aimed at meeting individual needs. The document does not mention any other definition. The European Commission does not think that water is an essential and irreplaceable resource for human life, a "social" good. The concept of "being indispensable" is a softer concept than "being essential" or "being irreplaceable". Something indispensable could be substituted and could stop being indispensable, it could be not essential, and not to have an industrial value or an exchange utility (commercial).

Water quality also is seen as an important and indispensable instrument because no efficient (and therefore, valuable, profitable, fostering economic growth and well-being of humans and nature) economic activity is possible if water resources are not in a good ecological status.

FIGURE 2 - THE THREE PILLARS OF THE PLAN



The Commission does not refer to water as “public resource” and, least of all, as “common good”. Its vision on water is dominated by a techno-productivist and utilitarian conception. The most frequent terms referred to water are mass/masses, flow/flows, balance/balances, availability, accessibility, use, consumption, efficiency, cost, price, trade. For the Commission, water has a high exchange value, profitable according to free economy principles in a competitive (actually oligopolistic) market.

Based on these considerations, “putting a right price on water”, in a general framework of monetisation of water and nature, represents the adequate tool for an effective management of water-commodity. Consequently, it is logical that the Commission decided to connect, deal in and assign to the economic stakeholders (both private and public) the task of monitoring, managing and prioritising the uses and modalities of use.

2.3 The building blocks of the Plan

The Plan was drafted during a long and complicated analysis, planning and political engineering. The Commission started from what it calls the “building blocks”, namely a series of studies, national policy assessments, public consultations and investigations on floods and droughts in Europe. Most of these acts are part of a required procedure, while others arise from decisions taken by the Commission under the pressure of some Member States. It is the case of the “Fitness check” which is an investigation conducted by the Commission in order to identify legislations, measures and political and economic practices that, at the national and European level, according to the Commission, prevented Member States from relieving themselves of the “burden” of regulations, bureaucracy, “social” and “environmental” limitations and, therefore, from applying the WFD provisions. Regardless the content, introducing in the European political language the notion of “fitness”, as if policies could be examined in terms of “fat loss”, and “agility and elegance during the march”, definitely, it is not an inspired initiative.

In [Figure 3](#), other blocks have been added beyond those mentioned by the Commission. The aim was to allow a better understanding of the key elements that have actually structured the draft of the Plan. The Commission does not explain the reasons of their omission.

Thus, no mention is made of the big building block representing the researches funded by the Commission before and after the WFD, in particular between 2002 and 2012. These researches are focused on the economic value of water and assessments on environment and natural resource costs and benefits: a “new” field of research called “the ERCB problem” (Environment and Resource Costs and Benefits). The studies on the ERCB are very important in order to: a) clarify and stronger legitimate the content of Art. 9 of the Directive relating to “water price”. The Commission, indeed, assigns a central role to this Article in implementing an “effective management” of water resources in Europe; b) define and create the European hydro-economic model. This model, according to us, probably constitutes one or even the big innovation of the Plan.

The progress made in the monetisation of water is fostered by the ERCB researches.

The Commission funded, among others, four projects:

1. In 2002, the WAT-ECO (“Water Economy”) Project which starts off the ERCB studies;

2. Between 2006 and 2009, the AQUAMONEY Project (its cost was more than 2 million Euro), aimed at the in-depth analysis and operational definition of key elements in order to create a water pricing system. 16 research centres of 13 EU Member States participated in this project.
3. Between 2009 and 2011 the WAT Intereg Project (Water and Territories), on the economic analysis of water demand in a certain region.
4. From 2011 to 2013 the EPI-Water Project ("Evaluating Economic Policy Instruments for Sustainable Water Management in Europe"), which was funded with about 3.5 million Euro.

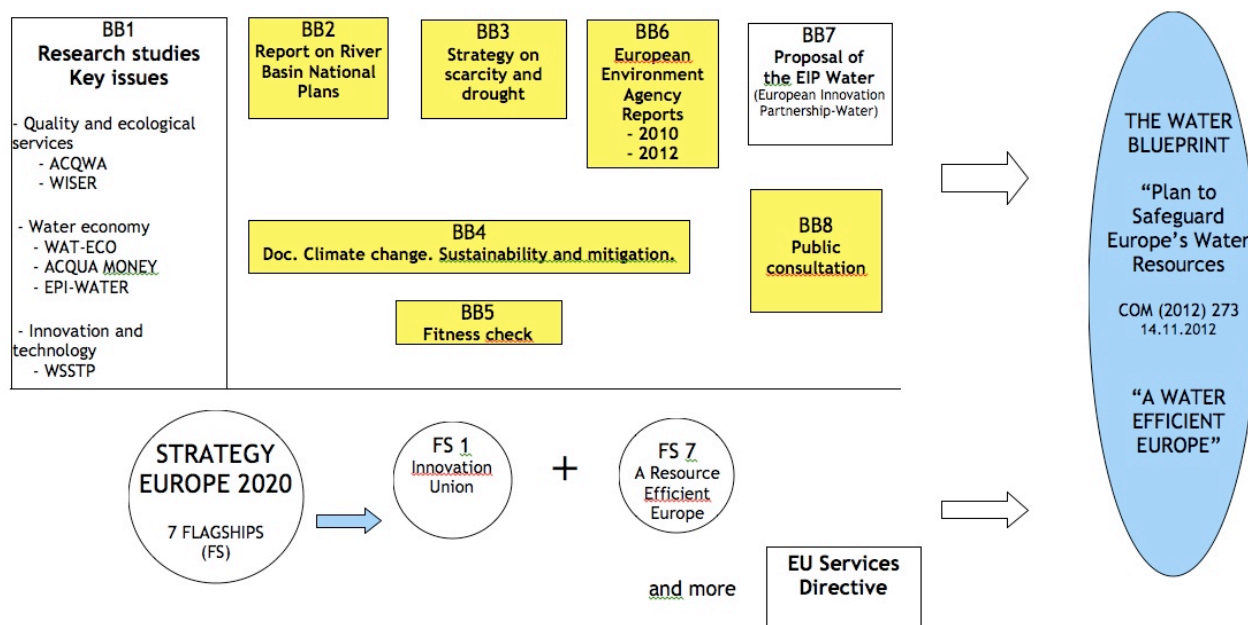
Among the most involved and active organisations in this field there is the OFWAT, the United Kingdom Office of Water, that is the Water National Agency (or Authority). It was created in the United Kingdom following the water services and water infrastructures privatisation realised by the Thatcher government, in 1989. Since then, the OFWAT is, within the EU, one of the most committed actors promoting the privatisation and monetisation of water. Considering the political role of the United Kingdom in the decision-making process and functioning of the EU, it is easy to realise that the mentioned researches influence the decisions of the EU Commission and the Council of the Ministers.

The 2006 Services Directive⁶ has a different and maybe major influence on water policies; a proposal for a new Directive was presented by the Commission in 2011.⁷ In case the Council of Ministers and the European Parliament formally or *de facto* (lacking a clear political agreement on this issue) decide that water services, both services of the short cycle (water abstraction, making drinking water, distribution, sewers and sewage disposal) and all the other related services have to be considered as part of the SGEI (Services of General Economic Interest), since they are services with an economic value, the provisions contained in the WFD and the Plan will be definitely confirmed. In this case, the possibility to change the economic vision on water would disappear until 2030.

⁶ *Supra*, n. 13.

⁷ Communications of the Commission on public procurement, COM(2011) 896 final of 20th December 2011, and on the award of concession contracts, COM(2011) 897 final of 20th December 2011.

FIGURE 3 – HOW THE “WATER BLUEPRINT” WAS BUILT
THE “BUILDING BLOCKS” (*)



(*) This expression was used by the European Commission in its Communication on the Blueprint. The coloured BB were explicitly mentioned by the Commission.

Finally, it is important to note the fundamental and decisive role of the Strategy Europe 2020 in framing the water policy. The title of the Communication from the Commission of 3rd March 2010 is clear: “Europe 2020: A strategy for smart, sustainable and inclusive growth.” Smart: through the development of knowledge and innovation. Sustainable: based on a more green, effective and competitive economy. Inclusive: aimed at promoting employment and social and territorial cohesion. However, the objectives to achieve by 2020 currently seem rather unfeasible:

1. 75% of the population aged 20-64 should be employed;
2. 3% of the EU's GDP should be invested in R&D;
3. According to the "20/20/20" climate/energy targets, the carbon emissions should be reduced to 20%; the use of renewable energy should increase to 20%, the energy effectiveness should increase to 20% (including an increase to 30% of emissions reduction if the conditions are right);
4. The share of early school leavers should be under 10% and at least 40% of the younger generation should have a tertiary degree.
5. 20 million less people should be at risk of poverty.

To this purpose, the Commission proposed seven flagship initiatives, two of which pertain to water policy:

- The Innovation Union, to promote the production of innovative products and services, particularly those interconnected with climate change, energy effectiveness and health. In this context, EU developed four European innovation partnership plans, one of them has been already mentioned, and it is the EIP-Water. The aim of the EIP-Water is threefold: to accelerate innovation processes in the field of water; to contribute to the sustainable development and to employment; to stimulate the adoption of innovation in the field of water by markets and society, putting together public and private actors and all measures aimed at supporting the balance between supply and demand of water;

- The initiative for a “Resources Efficient Europe”, to support a sustainable management of resources and to reduce carbon emissions, supporting the European competitiveness and its energy security.

The objectives of the “Resources Efficient Europe” constitute a general political and operational framework; within this framework there is “A Water Efficient Europe” that represents the task assigned by the Commission to the “new” water policy through the Plan.

In this context, the Plan has to face and solve two big challenges:

1. To manage the interconnections between water, agriculture, industry, energy, transports, housing (city), and territory.
2. To implement the objective “get citizens involved”, citizen participation.

2.4 The two challenges for the “Water Efficient Europe”

The “governance” of the interconnections between water, agriculture, industry, energy, transports, housing (city), and territory.

According to the Commission, the success of the Plan will largely depend on the concept developed in “A Water Efficient Europe” and how it will be implemented. Indeed, using water efficiently means acting at the core of the interconnections between water, agriculture/food, health, energy, transports, then housing and the organisation of our cities and regions as integrated systems of agricultural, industrial and energy activities, transports and lifestyles.

Currently in Europe (EU), the most of water abstraction is for: cooling water in energy production, first of all, in nuclear power plants, and irrigating. Data reported in the Plan are clear: “agriculture accounts for 24% of water abstraction in Europe” while “the 44% abstracted for cooling water in energy production”

(p. 13). Relating to pollution and contamination, the main causes are agricultural activities and industrial production characterised by chemical-intensive processes and considerable use of toxic substances.

The economic management is another critical point of the current interconnections: the abstraction for domestic use represents on the average less than 20%, while it represents about 80% of payments. Certainly, the access to a cubic meter of drinking water (for domestic use) per capita costs considerably more than a cubic meter of water for irrigation or industrial and energy use. The difference between the water cost for domestic use and that for other uses is too high. This is true especially if we consider the costs of pollution and contamination caused by energy, industrial and agricultural activities (except for new pollution forms caused by domestic waters (WC-urine) because of the excessive toxicity of drugs absorbed by an elder and elder population with a high level of medicalisation).

One of the strongest and well-founded criticisms in relation to the WFD was that it had not faced, in a consistent and strong manner, the management of interconnections between quantity of accessible safe water and sources of deterioration. The analysis of the causes related to agricultural production, industrial activities, energy system, land use, and territory management is weak, and “too politically correct”; moreover the measures aimed at providing the society with a real power to control and sanction are limited and inadequate.

Surely, the Plan is more effective. The Commission is right when it insists on the weakness of the “governance” of interconnections at the national level. This weakness emerged from the assessment of the operational national plans. It does not seem that the Commission has done the regulatory and programmatic changes needed to promote an effective and integrated European policy on water, able to provide EU, and in particular its different regions, with the capability to respond on cooperative basis to the

challenges of interdependence. The proposal of the Plan to act mainly in the field of economic politics (economic mechanisms and public incentives) and the promotion of innovation and technology is not enough. The most powerful users and the richest and most developed regions already have an articulated and effective control on these instruments. Moreover, the “governance” of interconnections cannot be left to a single region in a context of high competitiveness for the access to the resources. As experience abundantly shows us, in these conditions, only strong and competitive regions can “survive” and this goes against the sustainable development of a “Water Efficient Europe”. The most part of the Mediterranean regions, including Italian, Central and East-European regions, won’t be able to achieve the objective of water efficiency.

Since the conditions and economic and political power of the regions are very different, it is not desirable that all the responsibility for the management of interconnections is transferred to them. It would be better to share responsibilities at the river basin level, so as to eliminate inequality factors. These factors, indeed, determine enormous gaps among the regions in the agricultural, energy, industrial and financial field, in terms of power to control and use available resources.

The other big challenge: “get citizens involved”, citizen participation.

As said, “get citizens involved” was presented by the EU authorities as the second “big” objective of the WFD. Art. 14 is specifically dedicated to this and it affirms: “The success of this Directive relies on close cooperation and coherent action at Community, Member State and local level as well as on information, consultation and involvement of the public, including users”.

To this purpose, the Directive establishes three obligatory steps for States in view of the River Basin Management Plans drafting by 2009: to make available to the public (by 2006) a timetable and a work programme for the production of the plan; to make available (by 2007) an interim overview of the significant water management issues identified in the river basin, on which all social actors can present their comments; to make available (by 2008) the draft copies of the River Basin Management Plan.

This allows us to formulate some brief observations to introduce the issue of citizen participation according to the current vision of the Commission and in the light of the ongoing practices. First of all, it is necessary to underline the variety and vagueness of the terms used on this issue. The text talks about public information, consultation and participation of the public, including users, and social actors that are allowed to comment, without any specification. In other words, European legislators interpret “participation” only as information and consultation processes: information from the top (public powers) to the bottom (public opinion, social actors), and a not binding consultation limited to the submission of comments on the most important issues related to water management. In reality, it is not enough to talk about citizen participation. We all know that information and not binding consultations represent only the first elementary stages in the participation process, but they do not represent participative processes. Participation means a combination of forms and modalities through which citizens are directly involved in the definition and selection of problems and priorities, in fixing the objectives and in taking decisions on a public plan, in the definition and approval of a law (for example, a popular initiative, abrogative referendum, etc...), an administrative measure, a collective intervention plan, in the follow-up of policies, plans, and even in the management of a public project and part of a public service.

But, in 2000, Europe already had a “fortune” of legislations, experiences and projects concerning citizen participation in territory management policies, sustainable development and sustainable cities. Remember,

among others, the Aalborg Charter (Charter of European Cities and Towns Towards Sustainability) of 1994 and the Aarhus Convention of 1998 on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters.

Actually, even before 2000, the EU authorities had progressively interpreted and transformed the concept of citizen participation in the administration and management of the *res publica* into the concept of “stakeholder governance”. Today, the prevailing vision is that the only important participation is that of “economic governance” where stakeholders are the main characters. Among the “characters” are also included citizens and representative public institutions, including States and Regions.

For the EU, “get citizens involved” means most of all “get stakeholders involved”. The Plan has adhered to this vision. “Stakeholders” are systematically mentioned as critical actors in implementing the Plan. The term “citizens” is never used. The Plan asserts: “the success of the approach proposed by the Blueprint will depend on Member States’ willingness and action to involve stakeholders and follow up to the Commission’s proposals (...)” (p. 4).

Who are the stakeholders? The stakeholders have become the main character of all European policies. Their participation is regarded as the condition to legitimate and optimise the EU policy management. For the Commission, in the field of water, they are:

1. Public institutions (national governments, ministers, regional governments, and local administrations)
2. Mixed-ownership agencies (e.g. the EUREAU, European Federation of National Associations of Water and Wastewater Services)
3. Companies (including financial ones) and their sector associations (e.g. the ELO – European Landowners Organisation) or professional companies (e.g. the Italian Federutility)
4. Academic-research community and their European networks
5. NGOs.

Trade unions rarely appear among the stakeholders taken into consideration. The definition and acknowledge of stakeholders at the EU level raise some questions about the academic-research community and NGOs. Currently, the academic-research community is more and more characterised by the presence of private actors, more than public actors. In some cases, although participating actors have formally public nature, they are strongly influenced by multinational companies that guarantee financial support for research contracts and sponsor different projects and activities. The same is true in relation to the NGOs that are directly funded by governments or companies, often through their foundations.

The WWF case is a good example. In 2007, the WWF signed a partnership contract with the Coca Cola Company in order to safeguard the freshwater in the world. The WWF often is the only representative of the NGOs’ family in the advisory councils, steering committees and task forces, created by the Commission to implement the European water policy. On the other hand, the Coca Cola Company participates in the same committees as representative of companies. This situation would deserve a re-examination by the EU authorities.

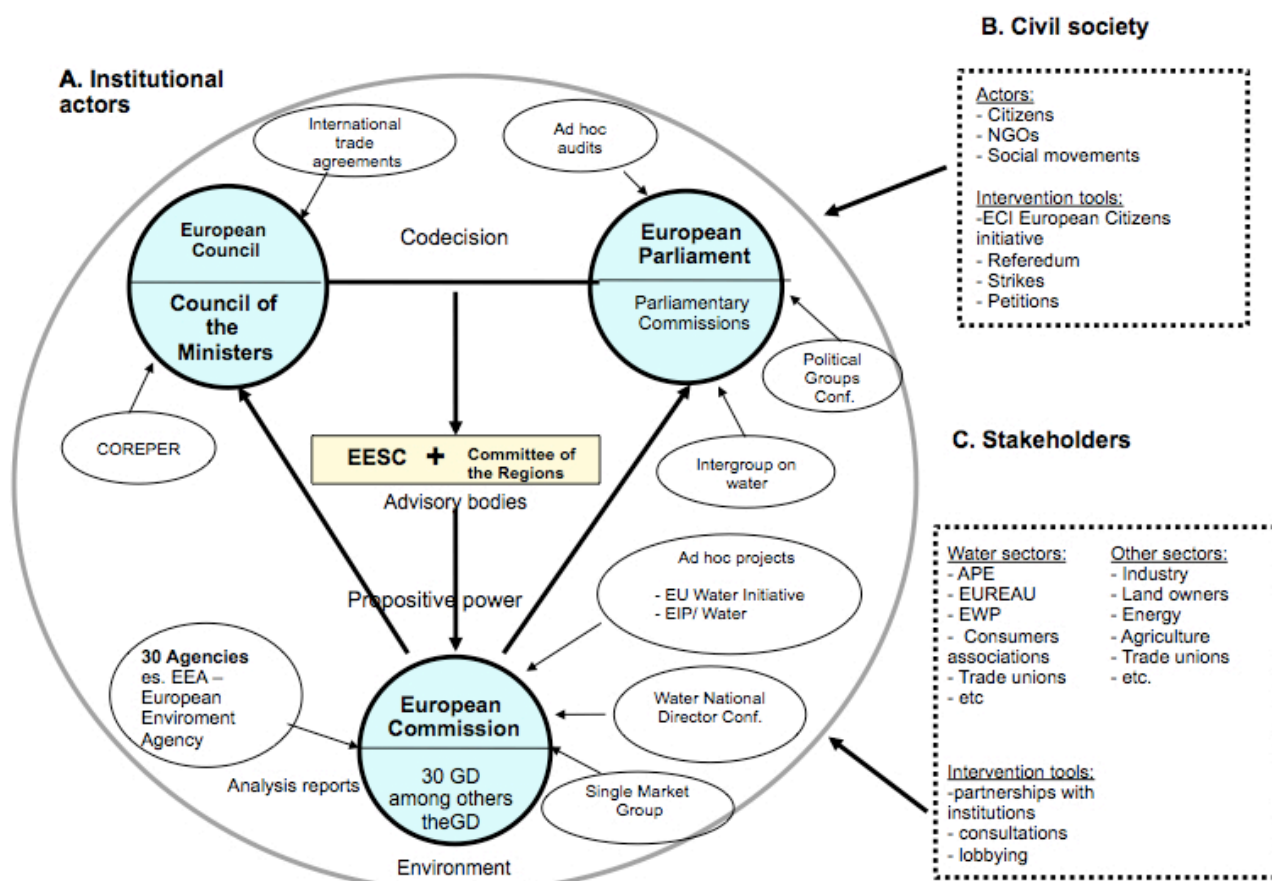
In order to analyse and illustrate how the stakeholders influence water policy, we are going to give a general overview on key actors in the field of water at the European level (Fig. 4); then, we are going to analyse in detail two examples: the research sector and the innovation and technology sector (Fig. 5 & 6).

In Figure 4, we did not highlight the lobbies’ action around the Member States Permanent Representations to the EU, because we all know of their existence and the power they have on media. The stakeholders

have also a formal direct and specific role into the two EU representative advisory institutions that do not have legislative powers: the European Economic and Social Committee (EESC) and the Committee of the Regions (CoR). It is worth to note that the Committees and bodies revolving around the European Parliament and Commission are the most important bodies where the stakeholders act, but they are not the only ones.

We have deliberately introduced the distinction between the concept of “civil society” and that of “stakeholders”, because we have been noting for years the tendency to incorporate all forms of civil society organisation into the category of “stakeholders”. Not all forms of society organisation turn into or have to turn into “corporate interests” or group interests that, since they exist, they have to be included in ongoing governance processes and public-private partnerships. Similarly, it does not seem appropriate to regard representative public institutions, such as the Regions, as stakeholders; in this way, they would be accounted as private stakeholders, however good and important it may be their territorial and/or sectorial representativeness (e.g. the Tuscany Regional Company Union or the Sicilian Agricultural Cooperatives Federation).

FIGURE 4 – THE KEY ACTORS IN THE EUROPEAN WATER POLICY



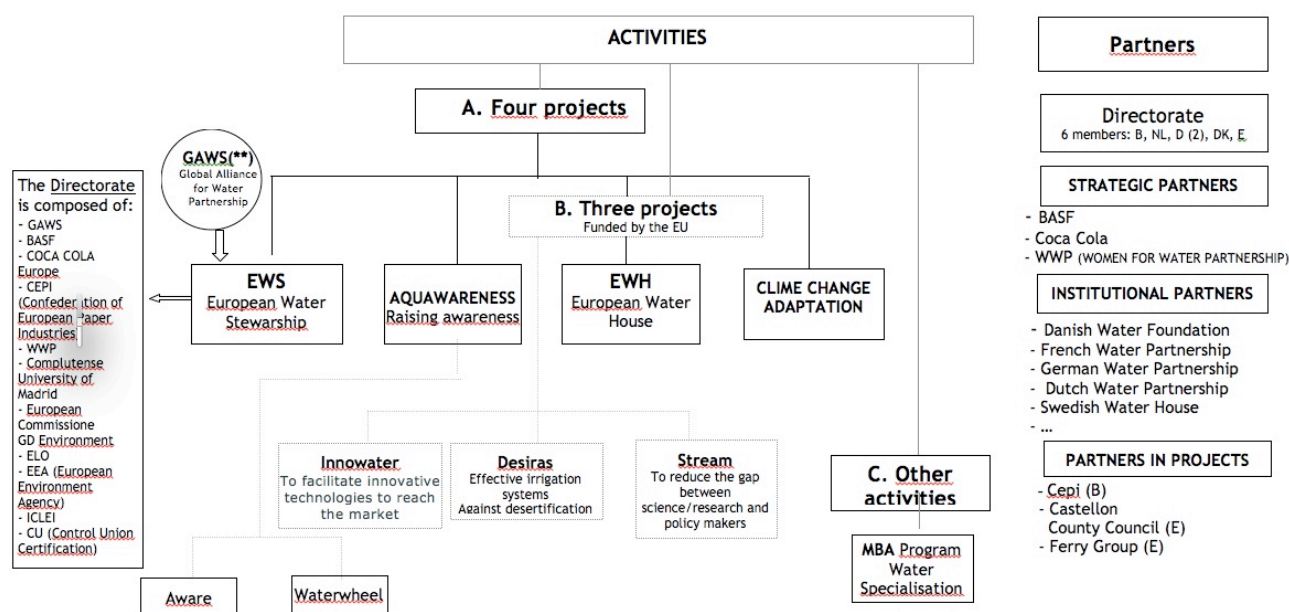
Research, innovation and technology are very important elements in the field of water because of the central role played by knowledge and innovation in the vision and in the practice of the EU institutions. We

gave a partial, but meaningful, example talking about the economic study on the value of water and on the environment and resource costs and benefits measure.

To this purpose, if we analyse the list of universities and research centres participating in the three mentioned projects (WAT-ECO, AQUAMONEY and EIP-WATER), we can observe that the most part belongs to the business school world or similar, and to research institutes oriented to or associated with the business world. There are also direct representatives of companies such as SUEZ, VEOLIA, etc... Figure 5 clearly shows the situation.

FIGURE 5 - EWP European Water Partnership (aisbl)

Financing: Research Program UE LIFE (*)



(*) The **GWP - Global Water Partnership** is an organisation created in 1996 by the **World Water Council** which was founded in 1995 by the main multinational water companies with the support of the World Bank. The World Water Council, in effect, created two instruments: 1- the **World Water Forum** aimed at promoting worldwide the vision of water as commodity and 2- The GWP with the objective to promote the implementation of that vision in the world.

(**) The **GAWS - Global Alliance for Water Stewardship** is an organisation created by tens of organisms, mostly multinational companies whose Directorate is composed of representatives of: Water Stewardship Australia, CEO Water Mandate, UNEP, The Nature Conservancy, Water Witness International, The Pacific Institute, The Carbon Disclosure Project, WWF, Water Environment Federation, EWP.

The European Water Partnership (EWP) formally is an international non-profit organisation under the Belgium legislation. It is the daughter organisation of the Global Water Partnership (GWP) at the European level. It was created thanks to European Commission's funds through the main EU research programme on the safeguard and conservation of nature which is called LIFE. The GWP was created in 1996 by the World Water Council, just a year after its creation, in 1995, on the initiative of some big multinational water companies such as SUEZ and VEOLIA, and with the support of the World Bank and the International Water Association (IWA) related to the business community for sponsor activities.⁸

⁸ On this, see Riccardo Petrella, *Capitalismo blu, supra*.

The World Water Council has created two operational tools: the World Water Forum, whose first meeting was held in Marrakesh in 1997, and the Global Water Partnership. The Forum has the function to define a world vision and long-term strategy on water consistently with the lines elaborated by the World Bank in its document/declaration of 1993, "Integrated Water Resources Management". In the last twenty years, this document has been the "bible" for what concerns water of the world ruling class. The GWP, rather, has the function to promote the implementation of the World Water Council's vision and strategy on water in the long term.

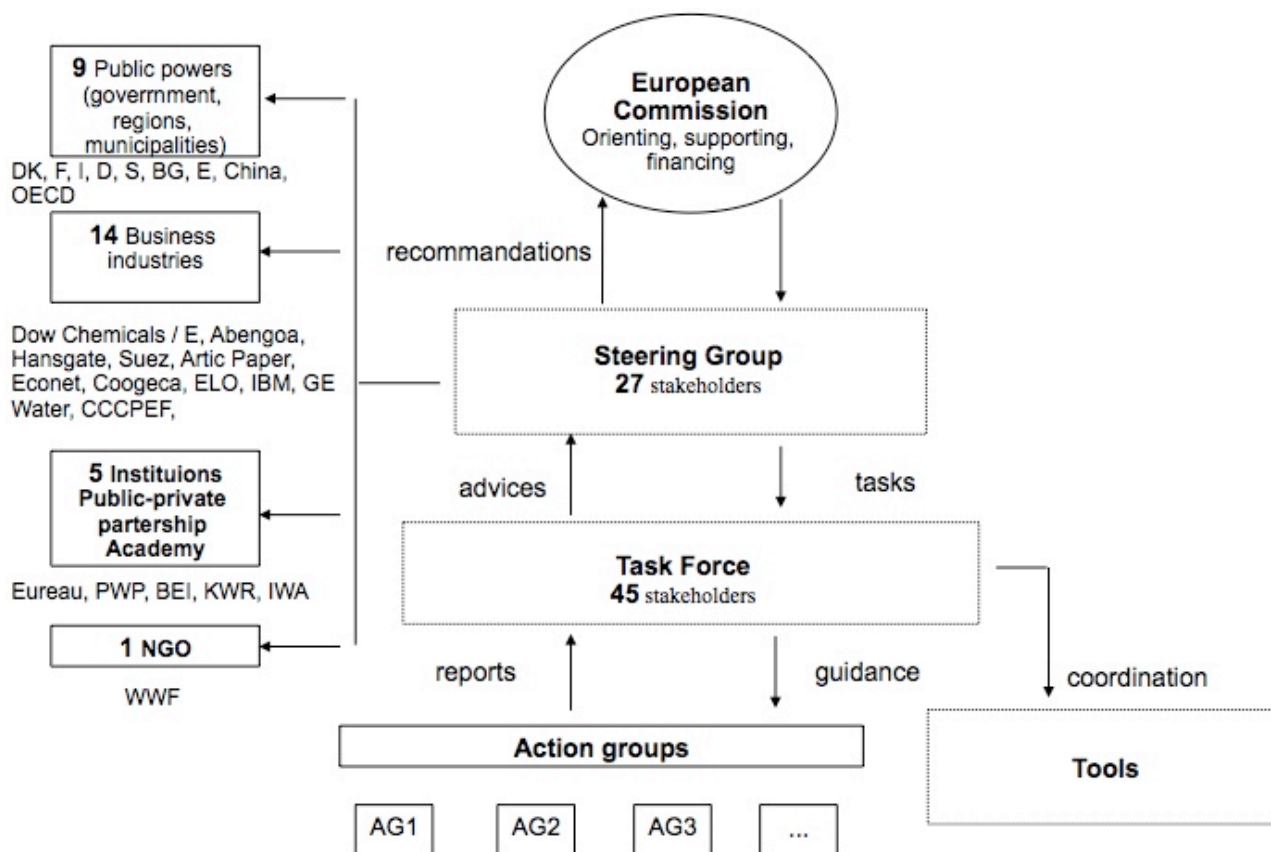
The EWP has been accepted by the European Commission authorities as a privileged spokesman in the water sector. It maintains close relations on cooperation, advising and implementation with the competent bodies of the Commission (GD Environment, GD Research and Innovation, etc...) Thanks to the financial support of the EU, the EWP manages four operational programmes and three research projects. The EWP has become one of the main channels for the following activities: ideation, debate, raising awareness, information and communication in the field of water between the Commission, the EU Member States, the European Parliament and the business and industry community (through the national associations of Water Partnership). See the list of strategic, institutional and projects partners.

Special mention deserves the European Water Stewardship (EWS) whose aim is to build a European stewardship system of water management based on stakeholders, starting from 2015, according to the lines of the Framework Directive. It does not seem that the Commission obstructs this idea, in fact, its Services form part of the EWP Steering Committee together, among few others, with Coca Cola, BASF, ELO and WWF.

The strong presence of stakeholders directly or indirectly related to the business and industrial world is confirmed also in the cases of Innotech and Stream which are research projects and, most of all, in the European Innovation Partnership on Water (EIP-Water) (Fig. 6). As known, the EIP-Water constitutes for the Commission the driving force of the Plan.

FIGURE 6 - THE GOVERNANCE OF THE EUROPEAN INNOVATION PARTNERSHIP ON WATER (EIP-Water)

L'EIP-Water is one of the 7 flagships of the “Strategy Europe 2020”



The EIP is directed by a Steering Committee composed of 27 members and a task force composed of 45 people. 8 out of 27 members of the Steering Committee represent governments and public institutions (there is only a representative for Italy, a council member of the Puglia Region), 14 are representatives of the business and industry world (among others, Dow Chemicals, General Electrics, SUEZ, ELO, etc..), 4 are from the academy-research world (known for their adhesion to the principles on which the WFD is grounded), and only 1 representative from NGO family, the inevitable WWF. The presence of the business and industrial world is even stronger into the task force.

There are no representatives of water public enterprise or their organisation, the European Public Water. The same is true as to representatives of agricultural cooperatives, associations in favour of an “alternative consumption”, and citizens’ movements in favour of water as a common good. The choice of the stakeholders co-opted by the Commission is a very clear message: innovation, for the Commission, is exclusively a technological and managerial innovation. This would justify the choice of the Commission because it selected competent organisations and experts from the business world.

Furthermore, taking into consideration the national representativeness criterion clearly emerges a strong presence of the United Kingdom, Germany, France, the Netherlands, some Scandinavian countries, Belgium and, to a smaller extent, Spain. Italy is represented to a lesser extent. The limited presence of the Central and Eastern European countries is evident. Sometimes, Poland, Hungary and Slovenia participate. The “European” policy on water seems mainly a business for stronger and more developed EU countries. The statements relating to the importance of a governance of interconnections between water, agriculture, industry, energy and territory management, through an effective water management policy, do not seem to have a concrete realisation in terms of involved actors.

In the light of these data, citizens can raise two questions.

How is it possible that, after forty years of concrete experience demonstrating that the “technology fix” led the related policies to fail, the Commission keeps on relying on technology to solve the problems created by the technology driven policies? Blindness caused by a “politically correct” techno-scientist dogmatism?

Furthermore, given that the development of agriculture and the modernisation of energy and industrial systems in Poland, Romania, Greece and Czech Republic are critical for the objectives of the Plan, would it not be better if EU authorities give more importance to the presence and real participation of these countries’ representatives?

3 An overview on the Plan’s proposals for action

3.1 Problems, specific objectives and implementation methods of the proposed actions

Concluding the analysis of problems, the Commission gives an overview on its proposals. The final general table, table 7, presents 20 objectives, around which are clustered the specific proposals, specifying their implementation methods (how to achieve the objectives) and timelines.

For what concerns the implementation methods, the Plan mentions four of them: on voluntary basis, on regulatory basis, conditionality and funding priorities.

Overview on problems and proposals

Problems	Number of proposals
1. Land use and water ecological status	5
2. Chemical status and water pollution	8
3. Water efficiency	9
4. Water vulnerability (floods and droughts)	7
5. Crosscutting solutions	10
6. General aspects (world problems)	2
Total	41

Proposals related to problem 1 concern measures on water natural retention and water resource accounts. Proposals related to problem 2 support the implementation and extension of the obligations stemming from existing directives (on nitrates, sewage disposal, etc...) and the adoption of other directives currently under examination at the Council of Ministers and European Parliament (on pharmaceuticals, quality standards, and certification).

The set of 9 proposals in the field of water efficiency (problem 3) focuses on enforcement actions to ensure compliance with Art. 9 of the WFD on water prices/full recovery costs, which is an *ex ante* condition to access to the Structural and Cohesion Funds, and European Investment Bank (EIB) loans. The Commission gives also great significance to the proposal to define by 2014 the EU approach to the pricing system, in particular the ERCB assessment and the water valuation for all stages of the long hydrologic cycle. In the analysis of problem 5, the Plan comes back to these aspects, giving more details, since its main objective is to define and implement the EU hydro-economic model. To put it in simpler terms, it is the key proposal in the European water policy architecture (monetisation of water) on which, as we have already seen, the academic-research world has worked for years for want of the Commission.

The Commission considers the ERCB assessment the fundamental element for implementing the WFD-Water in the logic of “A Water Efficient Europe” objective. The ERCB is seen as the key tool to:

- Put a price on water
- Steer investment choices and use priorities
- Evaluate water efficiency for “new” technological solutions aimed at supporting an adequate water supply (e.g. the sea water desalination)
- Promote the European environmental accounting and support the competitiveness of the European water industry
- Evaluate development scenarios and action programmes of Member States and Regions.

The proposals related to problem 4 are aimed at implementing the provisions in the matter of drought risk management and strengthening the European Drought Observatory.

Coming back to problem 5, the Commission adds some proposals on raising awareness actions and on the reduction of water consumption by industries.

Finally, the Plan mentions only two actions regarding the world problems: a scanty and cursory reference to fulfil the commitments taken by the EU in the framework of the Development Millennium Goals (halve, by 2015, the proportion of the population without sustainable access to safe drinkable water and basic sanitation) and a more significant reference to promote the application of the integrated and sustainable water resources management, according to the World Bank model to which the EU has clung since 1993, when the World Bank published its report/declaration on IWRM.

In the matter of implementation methods, the “voluntary basis” method represents the favourite category of the Commission: it is mentioned 19 times, while the “regulatory basis” only 6 times. The little significance conferred to the method based on regulation at the European level is doubtless due to the fact that the Commission is in agreement with Member States’ opinion. In the last ten years, Member States have pushed the Union to leave the concept of “European common policies” aside, and to adopt and prefer that of “European coordination of national policies” applying, mystifying it, the subsidiarity principle.

3.2 Strong points and criticisms of the Plan

The Plan is pretty accurate in terms of objectives and measures to take in order to realise the main objective of the WFD, the good ecological status of EU’s water resources. Similarly, it is clear the option of the Commission in favour of three strategic choices:

- Improvement of knowledge and promotion of technological innovation. This explains the critical role conferred to the European Partnership for innovation in the field of water;
- Strengthen of pricing/tariffing systems based on the full recovery costs in a general framework of monetisation of water. This is considered a necessary and indispensable instrument for an effective management of EU's waters. For this reason, the Commission insists on the total respect of the pricing system which becomes a condition to access to Structural and Cohesion, and EIB loans;
- Governance system of European water policy based on the main role of the stakeholders. For this, the Commission prefers the "voluntary basis" method for the implementation of the Plan's objectives.

In our opinion, we have to consider the following aspects criticisms to overcome:

- a) The Plan limits itself to consider water exclusively as natural resource/essential/ with a strategic value for economy, production, well-being and sustainable consumption levels. The Plan relies on the idea that "water is essential for human life, nature and the economy", but it is totally committed to analyse, evaluate and find instruments to face and solve problems and challenges regarding water as "essential resource for economy". Besides sporadic mentions in the text, the Plan does not deepen the role of water as "essential resource for human beings" at the biological, human, social, cultural and political level. The relationship of urban population with water rather than rural people, legal systems of water ownership, cultural conceptions on rights and responsibilities, lifestyles linked to water (health, mineral water consumption, etc...), these and many other very important aspects for human beings are not taken into consideration at all. Apparently, these aspects do not pertain to the policy and management of water regarded as a scarce resource. The same is true for water as "essential resource for nature". Following some basic unavoidable mentions regarding flows, essential resource and chemical status of water, the term "nature" disappears from the text. Little is said about water footprint, food consumption, oceans, biodiversity and urban water;
- b) The Plan does not deal explicitly with the issue of the ownership of water (Who does it belong to? Who is responsible for its control and use?), but it resolves it a) leaving the Preamble of the WFD unchanged where it affirms that "water is not a commercial product like any other" and b) facilitating the commodification of water and water services through a retail pricing system and economic and managerial market instruments. The Plan does not even deal with the issue of the nature of water services, except for affirming that they need to be monetised (ERCB); it leaves this issue to coming services directive;
- c) The Plan lacks a European vision; there is no reference to the European peculiarities of the problems and perspectives on water in Europe. Acknowledging that more than 60% of the EU's waters belong to border/ transnational river basins did not lead the Commission to consider water as a common "European" resource. The Plan does not represent a European policy, but a set of proposals for the effective management of water resources in Europe. This is a Plan that, with due changes, could be implemented indifferently in any region, city or country. Apparently, the economic value of water and the European Single Market are insufficient to give unity to the water policy in Europe;
- d) There is no reference to the role of the Regions and local communities. The concepts of "city" and "community" are not mentioned. Probably, the European institution thinks that they are not even part of the issue of water as "essential resource for economy";

- e) As already reminded, the citizens' participation is regarded only as involvement of stakeholders. They participate in all expert and advisory Committees created by the Commission Services. The Aarhus Convention of 1998 in practice is not applied. The Leipzig Charter of 2007 on territorial cohesion has been shelved;
- f) The human right to water and its implementation within the European Union is not the aim of any chapter, section or proposal. Yet, it is problematic to talk about water efficiency in the EU if, in wide areas of national territories, the sewage disposal does not surpass yet the 50% of total volume of used waters. In some cases, sanitation quality is far from fulfilling the standards existing in other Member States. We cannot even talk about water efficiency when more than 50 million European citizens have not yet permanent and regular access to safe drinkable water. What are the Commission's proposals about this situation?
- g) The management of connections and interdependences with other policies (alimentation, health, agriculture, industrial activities, energy, transports, housing/city and territory management) remains very fleeting and fragmented. Some progress has been made compared with the WFD of 2000, but the proposals contained in the Plan do not allow making the difference at the political and concrete level. The maintenance of existing ownership system of urban land prevailing in the most of Member States and the speculative land regime, the fragmented land management, the weakness of the European policy on rivers and the use of rainwater, the lack of a European public financial policy based on a European cooperative bank (the EIB does not fulfil the requirements) do not allow supposing that the good ecological and chemical status of waters in Europe could be achieved by the new deadline postponed to 2027.