

**Discussion paper of Association of Water Companies (AWC) and Association of
Industrial Ecology (AIE)
2nd ICPDR Stakeholder Forum, June 29–30, 2009, Bratislava, Slovakia**

1. AWC and AIE state, that transposition of the European directives into national legislation and implementation process of Water Framework Directive are not going in Slovakia in compliance with timetable and work program according this directive. Most activities taking place currently are rather formal without ambitious to achieve target solutions.
2. Draft of the national DRBMP (part B) is only general document containing only aggregated data without links on more detailed background documents like databases, reports, guidelines. Draft of the national part B DRBMP is less detailed than part A – Roof Report. In additional there were found rather big discrepancies between aggregated data presented in the national draft of RBMP and the data in part A (Roof Report). And different data are also provided in the reporting documents sent for European Commission within reporting obligations. **There arises a question if data provided for ICPDR and EC from Slovakia are correct.** Programme of measures are not addressed, stakeholders are not sufficiently informed about the tasks that they should realize in the next three years.
3. Communication with interested parties has rather declarative character, ongoing activities can hardly be considered as real dialog between competent authority and individual stakeholders. Repeatedly offered cooperation from AWC and AIE, addressed to competent authority with the aim to achieve active involvement into planning process, have not been accepted.
4. Written application of AWC addressed to competent authority to make available background documents with detailed information used for designing of the National programme for implementation of the Directive 91/271/EHS on Urban Waste Water Directive (UWWTD) was dealt with by the Ministry of the Environment only formally with reference to the reporting documents containing only aggregated data and this decision was justified as follows: *"background documents are individual data, which are necessary to be protected. Providing of these data is possible only with the agreement of the data provider. Currently Ministry of the Environment does not have this agreement"*.
5. Due to insufficient transposition and implementation of Water Framework Directive and little concrete and no-address character of programme of measures in the draft of national part of DRBMP, interested parties are not allowed to apply for justified exemptions from environmental objectives according the to conditions described in the article 4 § 4, § 5, § 6, § 7 of WFD.
6. Current water-pricing policy of the government does not create conditions for financing of measures needed for fulfillment of the UWWTD requirements. Article 9 of WFD is being transposed into national legislation only these days. However transposition process seems to be only formal. None concrete steps towards implementing of article 9 WFD are taking place and also are planning in the RBMP.
7. Officially adopted long-term strategy for solution of contaminated sites is not in compliance with the requirements of WFD in particular concerning environmental objectives and timetable given for realization of necessary measures. Legal act introducing new rules for contaminated sites was adopted by the Parliament these days. It is supposed, that this act will have serious economic impact on industry inadequate to effect on the environment. Necessary measures for contaminated sites were not included into the national DRBMP and competent authority will not be responsible for this kind of point sources of pollution.