Recast DWD Conceptual Model Questionnaire

- Statement to the MS feedback received -

A Remarks on data requirements

The DWD does not give justification to report the required data in the tables "Member States", "National Summary", "WSZWater Supplier", "WSZLinkto WFD", "WSZParameterFrequency", "WSZExceedancesInformation", "WSZExceedancesCause", and also in the other tables there are data that is not required by DWD to be reported.

The tables "Member States", "National Summary" and "WSZWater Supplier" have been removed. Information requested in the initial table "WSZLinkto WFD" was reduced to a minimum. The remaining information requested (euWaterBodyCode, SurfaceWaterBodyCategory, euGroundWaterBodyCode) was included in the new table "WaterSupply". Information that was supposed to be covered by the table "WSZParameterFrequency" is included in the table "MonitoringProgramme" now. The suggested table ""WSZExceedancesInformation" has been removed. Information requested in the initial table "WSZExceedancesCause" was reduced to a minimum.

We don't see the relevance of items listed under (9) Protected AreaType_Enum. In our view, the only relevant is Article 7 Abstraction for drinking water.

The code list was deleted together with the table it was referring to (see above).

Elements 'ExceedanceCauseSubcategory',' ExceedanceRemedialSubcategory' and 'IncidentCauseSubcategory' must be removed from the conceptual model. If these elements are maintained, they must be optional. Same applies for the reasons and remedial actions for explaining incidents.

All three elements were deleted.

In Art. 18 (1) lit. c only exceedances regarding parameters in Annex I Parts A and B have to be reported, the conceptual model in the excel sheet "tables" also requires reporting on all data regarding the indicator parameters (Part C). In the excel sheet "elements" only Annex I Parts A and B are mentioned.

A code list for the DWD monitoring parameters will be created for all parameters included in Annex I Parts A, B and C of the recast DWD. The list is adapted to the requirements of the recast DWD.

Maintaining the monitoring frequency table is not justified because according to the new directive, the monitoring frequency may be reduced or increased and some parameters may even be eliminated according to the risk assessment. In addition, this requirement is not provided in art. 18. We consider that it should be removed.

As Art. 18 (1) lit. b will be implemented later than Art. 18 (1) lit. c-e, the information request on sampling frequency for single parameters is still part of the conceptual model as part of the table “MonitoringProgramme”.

B Questions and comments on incidents reporting

It is unclear which necessary information is required by the following: IncidentUseRestriction, IncidentUseProhibition, IncidentRestProhreason, IncidentRestrProhtimeframe.

The element “IncidentRestProhreason” has been removed. The element “IncidentRestrProhtimeframe” was renamed to “incidentRestrictionProhibitionTimeFrame”. A description of the information needs for these elements is included in the guidance document provided.

Code list for "(17) IncidentCategory": There are also further possible cause subcategories. Please insert: C-Prolonged drought, C-Flooding, C-Accidental pollution. Spelling correction needed: Water interruption (uplanned) – (unplanned).

The suggested categories were added to the code list. The Typo was corrected.

For the code list (15), suggestions should be possible when the elements E, S, N are selected in the code list (14), otherwise there is a dead end since nothing can be selected in the code list (15).

The code list for “(15) RemedialSubcategory” was removed.

If an accident or disaster leads to the exceedance of a parameter – shall they be seen as one or considered two separate incidents?

The conceptual model allows for the linking of one incident identifier to an exceedance but for the allocation of more than one incident cause to an incident. Thus, the incidents should be considered as one if the characteristics of the incident are identical. If this does not apply, the incidents should be considered as two and only one of the incidents can be linked to the exceedance of the parameter.

The DWD speaks of incidents “that have caused a potential risk to human health”; at what point do water scarcity or water interruption by themselves pose such a risk?

Within the working group it was discussed that water scarcity and unplanned water interruptions can indeed pose a potential risk to human health.

“ExceedanceID” is a required field, but according to the definition in the DWD, the exceedance of a parameter is not a prerequisite for an incident. This element should be optional. The element “ParameterCodeAnnexI(A,B,C)” should then be conditional.

Both elements were removed from the table “incidents”.

To be consistent: a potential given fact or situation listed in the Excel file "Draft Conceptual data model.xlsx", Tab "code lists" column "T" (accident, exceedance of DWD water quality parameters, outbreak, physical disaster, water interruption unplanned, water scarcity, other) is only considered as an incident, when all 3 conditions of Art. 18.1 point d are fulfilled. Is this right? In other words, a specific situation that affects the drinking water distribution system is not automatically an incident; to be considered as an incident, it has to fulfil these 3 conditions (more than 10 days, more than 1000 people affected and potential risk for human health)?

Yes.

Exceedance/Incidents: could an exceedance be/become at the same time an incident? Has it to be reported two times and will the incident ID be the same as the exceedance ID, in this case?

An exceedance cannot become an incident but an incident ID can be linked to an exceedance ID as additional information.

Is an exceedance of one parameter considered as an incident or is it only available to be considered as an incident when more than one parameter exceeds the water quality limit? (same questions as at the previous point.

An exceedance of one parameter cannot be considered as an incident but it can be caused by an incident (see answer to the question before).

The category "Exceedance of DWD water quality parameters", that should not be considered as an incident category, as all the other categories can involve (or not) an exceedance.

The category has been removed from the code list.

Example: We found just one issue which is not clear. 7 years ago, we had big water-borne outbreak in Prague, which affected about 10 thousand consumers which became ill, but the event lasted just about 1 week - i. e. less than 10 days. According to the definition, as just one condition was met, this outbreak should not be reported (as the incidence). Are we right in our judgement?

Yes.

The causes are very numerous, but could be included in:
- *Malfunction of the purification treatment*
- *Accident in a warehouse or in the distribution network*
- *Natural disaster*
- *Meteorological causes: Persistent drought or flood*

We discussed this suggestion within the working group but decided to keep the suggested structuring due to the fact that it is more in line with existing incident reporting practices of the member states.

Multiple-choice options should be available when MS report incident cause in the model. Because sometimes a physical disaster could be a cause of exceedance which in turn could lead to an outbreak.

The possibility to choose more than one incident cause when reporting an incident was included in the updated version of the conceptual model.

Can you confirm that incidents related to the catchment/treatment plant when there was no potential risk / exceedance at the tap or no use restriction or prohibition should not be reported?

Yes.

C Questions and comments on exceedances reporting

We suggests to add "Leakage" as a subcategory in the list (13) "CauseSubcategory". This new code "Leakage" can be related to " P Public Distribution Network related" in accordance with the list (12 Cause).

The code list "CauseSubcategory" was removed.

For the code list (13), suggestions should be possible when the elements D, S, O and U are selected in the code list (14).

The code list (13) "CauseSubcategory" was removed.

TotalAnalysis - Is this the number of analysis, which have to be performed during one year? Does it include all the supplementary analysis, which were necessary to remedy exceedances (one occurrence, or all occurrences during one year)?

Yes.

"ExceedanceCause" and "ExceedanceCauseSubcategory" are reported in the table "WSZExceedancesCause", therefore we wonder if in the element "ExceedanceCauseSubcategory" should be implemented as a single-choice or multiple-choice? Whereas the option "S Combined Causes" from the list (12) suggests that the "ExceedanceCauseSubcategory" should rather be a multiple-choice than a single-choice option.

The element "ExceedanceCauseSubcategory" was removed.

For some chemical parameters (e.g. lead, chromium) a transitional regulation in the drinking water directive is granting a transitional timeframe to lower parametric values nationally (e.g. compliance with the parametric value of 5 µg/l for lead has to be assured no later than 12th of January 2036; before that date the value of 10 µg/l is valid). Therefore, it should be specified which parametric value will be the reference for reporting exceedances during the granted transitional timeframe.

The table “MonitoringProgramme” includes additional elements to define the “parameterThresholdValue” and “parameterThresholdValueUnit” now.

Do we only have to fill in the table for the parameters with a “restprohreason” (column M table code lists)? Or will it be possible to leave the line ‘empty’.

We included the option “other” in the code list.

Causes and causes subcategories (as well es remedial and remedial subcategories) are listed in the EXCEL table with the same codes. Will the subcategories get a more specific code?

Fields to enter cause subcategories and remedial subcategories were removed.

D Questions and comments on derogations reporting

There are 2 tables for incidents or exceedances to characterise these elements (WSZexceedances, WSZexceedancesinformation, WSZincidents, WSZincidentsinformation) there is only one for each derogations (derogationDx). It may be simpler to regroup the 2 tables for each element.

As the information requested for reporting exceedances and derogations was reduced, the number of tables to characterise these elements was harmonised.

Is the “Reporting type” (required/conditional/optional) for all derogation tables correct? (D1 is “required”, with “optional” Parameter, D2+D3 is “conditional”)

The derogations tables were revised completely. Instead of three tables as suggested in the first draft of the conceptual model, all derogations will be reported in one table now. With this, the indicated issue of inconsistencies in data needs were fixed.

There seems to be no element to indicate a parameter.

A corresponding element, called “parameterCode” was included.

We have to say we do not understand all items (information) requested. To mention some points:
a) Table 17, 19 and 21 – euWSZCode, ParameterOther, DerogationGrounds
b) Table 19 and 21- ConclusionsFirstDerogation

The elements “ConclusionsFirstDerogation” and “ParameterOther” has been removed. The element “waterSupplyZoneIdentifier” has been renamed. For more information about the required information for each of the elements, please refer to the guidance document.

What does the number of analysis, and their min, max and median values refer to?

The table on derogations was revised. All four elements were removed.

E Questions and comments on other data elements and data lists

In code list (3) monitoring parameters – under this indicated only parts B and C. Why part A is not listed? Of course in table 08 (WSZParameterFrequency) it indicate A, B, C.

The text of the code list has been corrected.

Code (4) ("WSZCategory") and Code (7) ("WaterSupplierCategory") have the same values (S serving less than 5000 people, M serving between 5000 and 50000 people, L serving at least 50000 people). Does S mean "serving more than 50 people and less than 5000 people"?

The elements "WSZCategory" and "WaterSupplierCategory" have been removed.

Is there a possibility to choose a categorisation with the amount of water supplied per day as the DWD provides for instead of the number of people served? If not, how are touristic areas taken into account. These questions are relevant for all elements which contain served people and volume (e.g. MS_TotalPopulation, MS_TotaResidentlPopulation, MS TotalVolume)

The element "volumeOfWaterSupplied" is defined as the volume (expressed in m3) of water distributed or produced each day within a supply zone.

"repCode", "euCACode": no definition for these Codes is included at the moment. Do we get this Code from the commission for every report or is there a logic to create this code?

The tables containing these elements have been removed.

Table 3 (Member State) is divided on 8 water bodies categories (MS_Groundwater, MS_Surfacewater, MS_Inlandwater, MS_Coastalwater, MS_Bankfiltrationwater, MS_Rainwater, MS_Otherwater, MS_ArtificialGrondwaterRecharge), which are different from the ones on table 7 – "euWATERBODYCODE", divided on 5 categories (LW Lake water, RW River water, TW Transitional water, CW Coastal water, GW Groundwater). We propose to use the same code list.

The initial table 3 (Member State) has been removed. The information on "SurfaceWaterBodyCategory" is included in the new table 2 (WaterSupply). The code list was adapted as suggested.

There should be a provision for additional coding when a WSZ covers more than one LAU or when a LAU contains more than one WSZ.

The element "WSZLAUcode" has been removed from the table.

(5) WSZState it is not clear this code, because if WSZ is closed there is no any data because it cannot be monitored.

The element "WSZState" has been removed from the table.

(8) WaterCategory_Enum: here there are 5 categories. To which category included waters from catchments or dams (it cannot be lake water), is it transitional water? In existing data model we have inlandwater, is it replace by transition water?

The table “WSZLinktoWFD” containing this element has been removed.

To the code list "(8) WaterCategory_Enum" add an explanation of how to report the water source, which is a water reservoir.

The table “WSZLinktoWFD” containing this element has been removed.

To the code list "(9) ProtectedAreaType_Enum" add a new item for the description: "GWTypeOfProtectedArea" namely "Bathing".

The table “WSZLinktoWFD” containing this element has been removed.

WSZ and water supplier is the same because one WSZ is covered by one water supplier; one water supplier theoretically can operate in more than one WSZ, but the accounting unit always is the WSZ.

The table “WSZWaterSuppliers” has been removed.

The meaning of ProtectedAreaType_Enum is not clear in the drinking water reporting context.

The table “WSZLinktoWFD” containing this element has been removed.

It is suggested, that in the table “National Summary” data are reported separated by category of WSZ / Water Supplier by adding an extra column (either WSZCategory or WaterSupplierCategory). The extension to all sizes of WSZ covered by the DWD will definitely increase the number of exceedances and therefore the percentage of non-compliant analyses. Based on the aggregated data, a comparison with the current reporting regarding the percentage will not be feasible anymore.

The table “National Summary” containing these elements has been removed.

It is not yet clear, whether all information has to be reported now across all sizes of water suppliers, even those < 10 m³ per day. It is also not clear on what provision in the DWD the data collection regarding the suppliers is based.

The information requested in the tables should be provided in alignment with the requirements of the DWD. For the exemptions, see Art. 3 DWD.

For small supplies, not as much data is justified as for large supplies because they provide smaller amounts of water and the parameter monitoring frequency and the number of samples / year is

much lower. Thus, the calculation of the median for all samples and the median for non-compliant samples is not significant and does not provide additional information.

The data request is based on the level of the water supply zone (not the water supplier). In order to facilitate the analyses, the information needs are identical for all water supply zones.

It is necessary to indicate more than just one competent authority „CompetentAuthorityName", as different data will be from different institutions.

Tables were modified so that it is possible to indicate more than one "ResponsibleParty" now. For each responsible party a specified role needs to be selected from the enumeration list. More than one role can be selected from the enumeration list.

- Reporting to the European Commission is the competent authority that is responsible to report to the EC.
- Incident Competent Authority is the authority responsible to report the incidents as defined in the recast DWD to the authority Reporting to the European Commission.
- Derogation Competent Authority is the authority responsible to report the derogations as defined in the recast DWD to the authority Reporting to the European Commission.

Due to the large number of data, the mean and median are considered to be equivalent. The cost in time and resources to calculate said data would not justify the information obtained.

As the calculation of mean and median values allows for more detailed statistical analyses, both values were maintained.

We ask for clarification on the detail of the information required on Table 6 -WSZWaterSuppliers:
• WaterSupplierCoverage WaterService" (population served with a percentual value?),
• WaterSupplierLink (link to the website of the water supplier?)
• WaterSupplierSize (related to WaterSupplierCategory? - defined on volume/population?)

The table "WSZWaterSuppliers" has been removed.

Regarding the reporting of monitoring of pesticides and PFAS, we wonder if MS should report individual PFAS or as 'PFAS Total'. Same with the pesticide reporting.

The conceptual model foresees the reporting of all parameters included in Annex I Parts A, B and C of the recast DWD. A code list for the DWD monitoring parameters will be created, that will include the CAS number and the parameter name. The list is adapted to the requirements of the recast DWD.

In SE we divide ground water in two different categories, one category that is affected by the surface water and one category that is not affected by surface water (just ground water). Previously we have reported those two categories as ground water simply, so the question is should we report as we have done previously.

The table "MemberState" that contained this information has been removed.

F Questions and comments on spatial data

It is not clear from the documentation whether the relation of WSZs and WFD water body/protected area can only be a one-to-one connection, or more WFD water bodies can be linked to a WSZ.

The structure of spatial data provision has been extensively modified. For more information on the provision of spatial data for DWD reporting of water supply zones, please also refer to chapter 3 of the guidance document.

Incorrect reference to code list no 16 in the spatial data sheet – it appears that the correct description should be: "to be filled if WISE Evolution is not noChange, change or deletion".

The structure of spatial data provision has been extensively modified.

How should we transmit the spatial data? There is no table in the conceptual model (excel sheet "tables") for the spatial data. Should the spatial data be available in an extra .xlsx File?

The structure of spatial data provision has been extensively modified. Spatial data should be provided as shape files allowing for polygons. For more information on the provision of spatial data for DWD reporting of water supply zones, please also refer to chapter 3 of the guidance document.

A discrepancy notified: in "spatial data" sheet, 9 row, "international ID of the water supply zone, equals euWSZcode from table [7]" , reporting type is mandatory, but in table 7 ("elements sheet"), 68 row, "reporting type" is optional.

The obligations to provide these information elements have been harmonized.

In the area of reporting the geometry object i.e. geometry: Points (optional polygons), Projections: EPSG:3035, EPSG:4258, EPSG:4326, due to the method of recording geographical coordinates (longitude and latitude separately) functioning in national databases and for the consistency of data processing, it is proposed to adopt reporting of longitude and latitude separately.

The structure of spatial data provision has been extensively modified. Spatial data should be provided as shape files allowing for polygons. For more information on the provision of spatial data for DWD reporting of water supply zones, please also refer to chapter 3 of the guidance document.

In sheet "spatial data", line 17 for the element "name: wiseEvolutionType" contains a reference to code list 16 (TimeFrame). Isn't that a typo?

The description of the element "wiseEvolutionType" has been corrected.

How should be identified the Longitude and the Latitude of a water supply zone?

For more information on the provision of spatial data for DWD reporting of water supply zones, please refer to chapter 3 of the guidance document.

G Comments on the contents of the conceptual model and the guidance document

It is of most importance to add a description column explaining each field in detail. It would be convenient if it would be added in the sheet "elements" of "Draft Conceptual data model.xlsx", not (only) in a separate pdf document.

The excel file was intended to provide a better overview of the reporting structure and its elements. The final version of the conceptual model will be transferred to Reportnet 3.0. Detailed information on all elements of the data model is provided in a guidance document.

In the excel sheet "elements", all elements of tables 23 – 25 are missing.

The excel sheet "elements" was intended to provide a better overview of differences between old and the new reporting structure and its elements. This table will be not used hereafter. Thus, no adaptations were made to this excel sheet but the excel sheet was removed to avoid further confusion.

There has not been provided any database constraints like primary and foreign key so there might be unknown issues.

Detailed information on all elements of the data model will be provided in a guidance document.

Codelists (e.g.(3) MonitoringParameter) should be available in Excel Format.

A codelist for the DWD monitoring parameters will be created, that will include the CAS number and the parameter name, for all parameters included in Annex I Parts A, B and C of the recast DWD. The list is adapted to the requirements of the recast DWD.

We suggest, keeping the spelling of the element-names homogeneous/consistent. To give two examples: ExceedanceTotalNonCompliances instead of ExceedanceTotalNoncompliances (capital C for compliances) or ExceedanceMedianNonCompliances instead of ExceedanceMedianNonCompl (either abbreviate the terms in all the element-names, or do not use abbreviations at all).

The spelling of element names was modified and harmonized.

Why is the term of "non-compliance" always in use at that point? We thought that it would be replaced by "exceedance"! What is meant by non-compliance in this case?

The final conceptual model only contains the term "exceedance". The term "non-compliance" will not be used.

H Suggestions to improve future reporting

It would be good to be able to suggest new codes after each reporting period, as most inconsistencies will be found during reporting.

This suggestion will be included in the considerations when defining the future reporting process.

I General questions on DWD reporting to the Commission

We would appreciate a timeline for reporting provide by the Commission. The timeline should include when reporting begins, all the other necessary deadlines, validation period, correction period, and period for completion. The requested timeline (as for other annual EU reports) needs to be in place well before the reporting.

Member States have to transpose the recast DWD into national law and comply with its provisions by 12 January 2023. In relation to Article 18(c)(d)(e), Member States have to set up data sets by 12 January 2023. The importance is to ensure monitoring in compliance with Article 9 and 13 recast DWD (+ remedial actions under Article 14). Considering the last reporting period under the DWD 98/83/EC covers the period 2020-2022, monitoring results under the recast DWD will start covering data of the year 2023 and subsequently to be updated annually (2024, 2025, etc …).

At the workshop, DG ENV understood that most Member States will be able to transfer monitoring results from the year 2023 in Q2 of 2024.

We would need the commission to clarify if these incidents, which should be part of the risk assessments, are to be included in the 3 year reporting, even though article 18 1b states that risk assessment models should be updated every 6 years.

With regard to the information related to the risk assessments under Article 18(b), the data sets on information related to the risk assessments (RA) need to be updated every 6 years. The update refers to the information, not the RA models itself. The modalities for the data sets for this kind of information still need to be discussed.

Are we still going to continue with the 3-yearly report? I thought we were supposed to have annual reporting after transposition? And if so, we need to have time to analyze and report the annual data (at least 6 months)

The reporting under the DWD 98/83/EC ends by the reporting period 2020-2022 which is due by February 2024. The national data on the quality of DW supplied under the recast DWD has its starting point in January 2023 and needs to be updated annually (cf. above).