



BATHING WATER QUALITY CONSULTATION

Surfrider Foundation Europe's answers to the citizen consultation

November 2021

The European Commission has launched a citizen consultation in the context of the review of the [Bathing Water Directive](#) (BWD). Surfrider Foundation Europe (Surfrider Europe) invites every European citizen to take part in the consultation in order to make the voice of the Ocean and its lovers heard. This European directive has a direct impact on the users' health preservation and the ocean's protection against pollution.

To guide you in the process, Surfrider Europe shares with you its answers to the consultation. **This document aims at informing you about our positions and answers as an environmental NGO, but the consultation remains yours to answer.** You should answer honestly, in adequation with your habits, knowledge and feelings about the water quality. Do not hesitate, in your answer to the consultation, to support our demands for [Healthy Waters](#). Surfrider Europe trusts each of you and your love for the Ocean to defend it in your own way before the Commission.

The consultation is divided in two parts: a general section and an expert section. Surfrider Europe, as an environmental NGO, has answered both, but it's up to you to decide whether you want to fill the 2nd part in. The question marked by a "*" are mandatory. We provide our answers in English and French, but you can answer the consultation in your native EU language.

Part I: Your views on bathing water quality

1. *Do you work in any of the fields listed below or have a particular interest in them? (Please select one or more answers as relevant)

- **Environment, nature**
- Water Management
- **Bathing water management**
- **Health**
- Education
- **Sport**
- **Recreation**
- Tourism
- Other
- I don't carry out activities, nor have a particular interest, in any fields above

2. *At what times of the year do you go to a bathing site – whether at sea or at a lake, a pond or a river?

- **All year long (as long as the meteorological and hydrological conditions allow)**
- During more than one season of the year
- In one season (e.g. in the summer)
- Never

3. *How often during the year do you go to a bathing site – whether at sea or at a lake, a pond or a river?

- **More than 30 times a year**
- Between 5 and 30 times a year
- Up to 5 times a year
- Never

4. *Where do you visit a bathing site – whether at sea or at a lake, a pond or a river? (Please select one or more answers as relevant)

- **In my place of residence (village, town, city) – local user**
- **At a location in my country that I travel to specifically for bathing – domestic tourist**
- **At a location in another EU country that I travel to specifically for bathing – EU tourist**
- **At a location in another EU country that I travel for bathing and also for other tourism purposes – EU tourist**
- **At a location outside the EU – international tourist**
- None of the above

5. *Why do you go to the beach or a bathing site? (Please select one or more answers as relevant)

- To bathe – only in summer
- To do water sports – only in summer
- **To bathe – all year round**
- **To do water sports – all year round**
- To sunbathe
- For recreation (e.g. jogging, volleyball...)
- To take a walk
- To socialize
- I don't visit bathing sites
- Other

6. *How important for you is the water quality of the bathing site?

- **Very important**
- Important
- Moderately important
- Of little importance
- Unimportant
- No opinion

7. *How important is the water quality of bathing site at the destination for your decision where to go on holidays?

- **Very important**
- Important
- Moderately important
- Of little importance
- Unimportant
- No opinion

8. *How do you check the water quality of beaches/bathing sites? (Please select one or more answers as relevant)

Careful: this is the response of the NGO Surfrider, which has been working on water quality issues over more than 20 years. It is important that you answer this question considering your habits in terms of information on water quality.

- **Interactive map on EEA website**
- **Annual report on the bathing water quality in the EU on EEA website**
- **EU information portals (EEA website, Europa Website for Water)**
- **National sources e.g. governmental website dedicated to the quality of bathing water**
- **Information available directly at the beach**
- **Bathing water profiles**
- **Local and national media**
- Information available at Blue Flag
- I don't check it
- Other : **Surfrider uses all the sources at its disposal. It seems that citizens use more local sources. We invite the authorities to improve the readability and means of making information available (app..)**

9. *How familiar are you with the Bathing Water Directive?

Careful: this is the response of the NGO Surfrider, which has been working on water quality issues over more than 20 years. It is important that you answer this question considering your habits in terms of information on water quality.

- I have heard of it but unsure what it does
- Some familiarity with the Directive and its provisions
- **Highly knowledgeable about the Directive and its provisions**
- Not familiar at all

10. *In general, do you consider the information on water quality provided by national or regional authorities that manage bathing sites to be timely and regularly updated?

- Yes
- To some extent
- **No**
- Don't know

*If you replied "no", please explain below:

Information on sites not always in place; long time between samples/analyses and display; lack of clarity; difficulties of access; lack of updates of the information...

11. ***Do you consider the information provided in the Annual report on the bathing water quality in the EU on the EEA website to be useful?**

- Yes
- **To some extent**
- No
- I'm not familiar with it
- I'm not aware of it

*If you replied "To some extent", please explain below:

Missing qualitative information; no information on challenges and management measures to improve water quality; useful report but too little dissemination; missing communication between UE and MStates

12. ***Do you consider the information provided about the bathing water quality on the interactive map on the EEA website to be useful?**

- Yes
- **To some extent**
- No
- I'm not familiar with it
- I'm not aware of it

*If you replied "To some extent", please explain below:

Useful for experts to have a comprehensive map at UE level; Lack of information on beach profiles, on the reasons for poor water quality and on management measures taken; Lack of "real time" updates.

13. ***Do you know what bathing water profiles are?**

- **Yes**
- No

14. ***Bathing water profiles provide a description of bathing waters and the potential impacts and threats to water quality, both as an information for citizens and as a management tool for the responsible authorities. Have you ever consulted a bathing water profile available online to gain more information about a specific bathing site?**

- **Yes**
- No

15. **If you consulted a bathing water profile, have you found the information presented therein as:**

- Clear and understandable: **Partially**
- Useful: **Fully**
- Complete: **Not at all**
- Up to date: **Not at all**
- Easily accessible: **Not at all**

16. **How satisfied are you with the accuracy of the information on bathing water quality available through the following sources?**

- [*EEA interactive map](#): **Dissatisfied**
- [*Annual report on the bathing water quality in the EU on EEA website](#): **Dissatisfied**
- *EU information portals (EEA website, Europa Website for Water): **Dissatisfied**
- *National website dedicated to bathing water quality: **Dissatisfied**
- Information available directly at the beach: **Dissatisfied**
- Bathing water profiles: **Dissatisfied**
- Local and national media: **Dissatisfied**
- [Blue Flag](#) website (not operated by the EU): **Neither satisfied nor dissatisfied**

17. *Have you ever participated in a public consultation regarding the identification of bathing sites in your country?

- Yes
- **No**

18. *Do you know what measures your national/local authorities take to improve the quality of bathing water?

- Very well informed
- Well informed
- **A little informed**
- Not informed
- No opinion

19. *In your opinion, has the Bathing Water Directive ensured the same level of protection/safety for everyone and everywhere in Europe?

- Yes
- **No**
- No opinion

20. How important are, in your opinion, the following aspects when considering if bathing waters are safe for bathing?

- Clarity of water: **Very important**
- Color and appearance: **Very important**
- Presence of faecal bacteria/virus/parasites/ algae: **Very important**
- Dangerous Chemical Substances: **Very important**
- Floatables, such as tarry residues, wood, plastic articles, bottles, containers, glass or any other substances: **Very important**
- Algal bloom - (*Harmful algal blooms (HABs) represent a natural phenomena caused by a mass proliferation of phytoplankton (cyanobacteria, diatoms, dinoflagellates) in waterbodies. Blooms can be harmful for the environment, human health and aquatic life due to the production of nocive toxins and the consequences of accumulated biomass (oxygen depletion) - Source: JRC Publications Repository - Algal bloom and its economic impact (europa.eu)*): **Very important**
- Presence of Jelly fish: **Not at all important**
- Presence of sea urchin: **Not at all important**
- Presence of animals (dogs, horses, birds) on the beach and in the water: **Very important**
- Presence of vessels (yachts, speedboats...): **Very important**
- Odor: **Very important**
- Beach litter: **Very important**
- Cleanliness of the sand: **Very important**
- Weather conditions: **Somewhat important**
- Water temperature: **Somewhat important**

- Information about bathing water quality available at the bathing site: : **Very important**
- Information about bathing water quality available online: **Very important**
- Information about different risks not associated with bathing water quality (e.g. landslides, waves, current...): **Very important**
- Early warning system (in case of short-term pollution or water rise): **Somewhat important**
- Lifeguard Surveillance: **Somewhat important**
- Public toilets with controlled sewage disposal: **Very important**
- Number of people on the beach: **Somewhat important**
- Monitoring of the quality of bathing water also outside the bathing season: **Very important**
- Other: **Very important**

*If you selected “other”, please list below:

- **Monitoring of the quality of recreative areas**
- **Address the source of proven pollutions**
- **The question is unclear: some information falls outside the scope of the directive, more related to safety than health issues.**

21. *How would you assess the management of bathing sites in the EU, in particular regarding pollution management measures?

- Satisfactory
- Not satisfactory
- No opinion
- **Could be improved**

*If you have replied “could be improved”, please explain below.

Improve communication to the public especially during short-term pollutions; obligation to prevent pollution at source; encourage public participation; ensure use and visibility of beach profiles

22. *What would happen if the Bathing Water Directive were repealed?

- Nothing, all will be the same
- **Quality of bathing water in my Member State will deteriorate**
- Quality of bathing water in my Member State will improve
- I would have less or no information on the quality of the bathing water
- Don't know

23. *Would you like to have more bathing options than today? (Please select one or more answers as relevant)

- **More naturel bathing sites in the cities**
- **More bathing sites at rivers**
- **More bathing sites at lakes**
- **More bathing sites at the seaside**
- **Bathing season lasting the whole year**
- **Bathing sites monitored throughout the year**
- **Other**

*If you selected “other”, please specify below.

- More sites for water sports or recreative uses. Since 1976, the uses of the coastline and the sea have evolved and developed. Today, there are many water sports activities on the coast and all users deserve the same health guarantees as bathers

- Guarantee healthy waters all year round
- Promote the possibility for citizens to participate and propose new areas to be monitored and managed.

24. *Are you familiar with the Blue Flag Programme?

- Yes
- No

Part 2:

Technical questions – Your views on the performance of the Bathing Water Directive

This part is more technical than the first one, dedicated to people who know the Directive and its effects (experts and specialized public). Feel free to fill this part too if you want.

25. *What role do you have in the implementation of the Bathing Water Directive? (Please select one or more answers as relevant)

Careful: this is the response of the NGO Surfrider, which has been working on water quality issues over more than 20 years. It is important that you answer this question considering your role.

- Designation of bathing sites and selection of monitoring points
- Management/operation of a bathing site
- **Sampling and analysis of samples**
- Classification of bathing sites
- **Public information and participation**
- None
- **Other**

If you selected "other", please specify below.

Whistleblower

**Representative of the Ocean community (Ocean lovers as well as sports enthusiasts)
Invited to participate in sites management by local authorities; link/facilitator between stakeholders**

26. *What do you think are the benefits linked to the identification, monitoring, classification and management of bathing waters? (Please select one or more answers as relevant)

- **Health and well-being of bathing sites users and local community in general**
- **Environment improvement (improved water quality and the health of water ecosystem)**
- **Recreation opportunities**
- Spiritual and cultural benefits
- Well-being of bathing sites users and local community in general
- Stimulation of tourism and financial benefit to communities based on tourism activities
- Education and research (-Datasets gathered over the years allow for the analysis of trends)
- **Satisfaction of knowing that future generation will have access to nature's benefits**
- Other

If you selected "other", please specify below

Identification of sources of pollution and adoption of appropriate measures to prevent and stop pollution. Very important to prevent pollution at source to ensure the full benefits!

Monitoring the environment and the health status of a site

Involve citizens in the management of their environment.

27. *In your opinion, how do the following, current requirements regarding identification, monitoring, classification and management of bathing waters contribute to the protection of human health?

- *Identification of bathing waters based on 'a large number of bathers' expected at the bathing site by the competent authority: **Weak contribution**
- *Monitoring of bathing waters – only during the bathing season (summer months mostly) when a large number of bathers is expected by the authorities: **Weak contribution**
- *Classification of bathing waters – four grades (poor, sufficient, good, excellent) based on two microbiological parameters over last four bathing seasons: **Weak contribution**
- *Management of bathing waters (e.g.: ways of dealing with short term pollution events and abnormal situations, measures taken to improve bathing water quality at 'poor' and 'sufficient' bathing sites) : **Weak contribution**

28. *Is monitoring of the two faecal bacteria parameters (E.coli and Intestinal enterocci) on which current bathing water classification is based, enough in your opinion to assure a sufficient protection of human health?

- Enough and satisfactory
- **Not enough**
- Could be improved
- No opinion

29. To what extent do you find that the BWD has led to the following (intended) benefits?

- *Assuring an enhanced and expanded participatory process by involving citizens' in the process of the identification of bathing sites **Some extent**
- Assuring an enhanced and expanded participatory process by involving citizens' in the process of the identification of bathing sites **Not at all**
- *Enhancing bathing water quality management to effectively protect citizens' health **Some extent**
- *Enhancing bathing water quality management to effectively protect the environment **Not at all**
- *Assuring appropriate and adequate identification of all bathing sites **Not at all**
- *Assuring adequate classification of the bathing sites **Not at all**
- *Assuring overall health protection by monitoring the bathing water quality **Some extent**
- *Assuring the timeliness of information provided to the public **Some extent**
- *Increasing awareness of quality of bathing waters **Some extent**
- *Increasing coordination at EU, national and regional levels **Some extent**
- *Contributing to the EU's global commitments like the Sustainable Development Goals (SDG 6 Clean water and sanitation and SDG 14 Life below water) **Some extent**
- *Other benefits **Large extent**

*If you selected "other benefits", please list them below:

Contribute to demonstrate the inherent link between the environment and health.

30. To what extent has the implementation of the Directive benefitted the following sectors?

- *Innovative industries (all sectors) **Some extent**
- *SMEs (all sectors) **Some extent**
- *Tourism sector **Some extent**
- *Passenger transport sector **Some extent**
- *Hospitality sector **Some extent**
- *Agriculture sector **Some extent**
- *Water treatment sector **Some extent**
- *Healthcare sector **Some extent**
- *Competent public authorities **Large extent**
- *Scientific research sector **Some extent**
- *Other sector(s) **Large extent**

*If you replied "other sectors" please specify below

Water sports enthusiast: Large extent

If correctly implemented, prevention of pollution could benefit to a larger number of sectors. Excellent water quality would produce benefits (direct or indirect) for all economic sectors.

31. *In your opinion, how do the costs of implementation of the Directive compare with the benefits brought about by the Directive (e.g. benefits including those listed in the previous question)?

- **Benefits much greater than costs**
- Benefits slightly greater than costs
- Costs similar to benefits
- Costs slightly greater than benefits
- Costs much greater than benefits
- Don't know

32. Identification, monitoring, classification and management of bathing waters result in costs. How would you rate the level of expenditure for actors involved in the following areas:

- *Public consultation **Very low**
- *Preliminary surveys to determine the technical and financial feasibility of a complete monitoring programme **Low**
- *Monitoring design (e.g. the selection of variables, station location, sampling frequency, sampling apparatus) **Neither high nor low**
- *Field monitoring (including in situ measurements, sampling of appropriate media, sample pre-treatment and conservation, identification, storage and shipment) **Neither high nor low**
- *Hydrological monitoring (e.g. measurements of water discharge, currents, tides, water levels, thermal profiles) **High**
- *Laboratory activities (including concentration measurements, biological determinations, etc.) **High**

- *Data quality control (consisting of analytical quality assurance within each laboratory and amongst all laboratories participating in the same programme) **High**
- *Data storage and treatment (Widely computerised. It involves the use of databases for data storage, reporting, statistical analyses, trend determinations, multifactorial correlation, etc. together with presentation and dissemination of results) **Neither high nor low**
- * Data interpretation (involving the comparison of water quality data from different stations. For specific problems, and the evaluation of the environmental significance of observed changes, external expertise may be needed) **High**
- *Water management (i.e. decisions concerning the redesign of assessment operations in order to improve the monitoring programme and to make it more cost-effective) **High**
- *Communication of the results to the public (on-line, social media, in situ) **Low**
- *Data reporting to the Commission **Low**

33. To what extent the following sectors have born costs (direct and indirect) due to the implementation of the Directive?

- *Innovative industries (all sectors) **Don't know**
- *SMEs (all sectors) **Don't know**
- *Tourism sector **Some extent**
- *Passenger transport sector **Don't know**
- *Hospitality sector **Don't know**
- *Agriculture sector **Don't know**
- *Water treatment sector **Some extent**
- *Healthcare sector **Don't know**
- *Competent public authorities **Some extent**
- *Scientific research sector **Some extent**
- *Other sector(s) **Some extent**

*If you replied "other sectors" please list them below

Water sports enthusiast: Some extent

34. Is there scope for simplifying the requirements and reduce the costs and administrative burden?

- Yes
- **No**
- Don't know

35. In your view, have there been sufficient resources invested to implement the Bathing Water Directive?

- From EU funding **No**
- From national funding **No**
- From other funding (including polluters) **No**

36. *What are the main pressures affecting negatively the bathing water quality? (please choose up to three answers from the list below) – at most 3 choices(s)

- Storm water overflows
- Agriculture run off (faecal pollution, nutrient surplus, pesticides and other chemicals used in agriculture)
- **Urban run off**
- **Improperly collected or treated urban waste water**
- Point source pollution from industrial activities
- Other diffuse pollution than from agriculture (pollution widespread activities with no one discrete source, e.g. acid rain, diffuse urban run-off, navigation, traffic)
- Eutrophication of the water body where bathing sites is located
- Animals in/on bathing water and beach (dogs, birds...)
- Lack of water, draught and high temperature that allow the proliferation of algae (relevant for inland bathing sites)
- **Other**

*If you selected “other”, please specify below

Agricultural and industrial activities are proposed in this question as sources of pollution but the pollution produced by these activities, chemical, is NOT included in the scope of the BWD.

Chemical pollution can be problematic for human health by itself and also lead to issues for environment and human health as Harmful algal blooms... This is why SurfRider Europe calls for the monitoring of new parameters to assess water quality such as chemicals, marine litter, HAB

37. Has the Bathing Water Directive been flexible enough to respond to the following new and emerging issues?

- *Swimmer’s itch **No**
- *Antimicrobial resistance **No**
- *Microplastics **No**
- *Pharmaceuticals and other substances of emerging concern **No**
- *Other **No**

*If you selected “other”, please specify below

Harmful Algal Blooms

Climate change challenges

Marine Litter

Chemical pollution

Protection of watersport enthusiasts’ health

38. *The WHO’s new Guidelines on Safe Recreational Water Quality call for health-based targets for recreational water bodies. Do you think that such targets should be:

- Set at EU level
- Set at national level
- **Other**
- Don’t know

*Please explain your answer below

The targets should be defined at EU level, with obligations for Member States to implement cross-border and/or local cooperation. In addition to the EU level, the regional level targets must be coherent with the MSFD.

For Surfrider Europe, it is important to take into account not only health but also environmental criteria.

39. The WHO's new Guidelines on Safe Recreational Water Quality also call for the development of recreational water safety plans for priority bathing sites. Should such plans be:

- Required in Eu legislation
- Left to EU Member States to decide
- **Other**
- Don't know

*Please explain your answer below

The plans should be defined at EU level, with obligations for Member States to implement cross-border and/or local cooperation. In addition to the EU level, the regional level targets must be coherent with the MSFD.

40. How important, in your opinion, should the following risk elements be in recreational water safety planning?

- *Faecal pollution **Very important**
- *Harmful algal blooms **Very important**
- *Other microbial hazard **Very important**
- *Pathogens of concern in beach sand **Very important**
- *Chemical hazard **Very important**
- *Aesthetic (obvious pollution of water body, turbidity, scums or odour) and nuisance aspects (jellyfish, insects, wildfowl and dogs) **Somewhat important**

41. Are there emerging risks or challenges not sufficiently addressed by the Bathing Water Directive?

- **Yes**
- No
- Don't know

*If you replied 'yes', please list below

Surfrider Europe believes that it is important to go further and take into account emerging risks and concerns such as chemical pollution, HAB, climate change...as well as long-term health and environmental risks. The new directive should also integrate the evolution of coastal uses. The review of the WB Directive must be ambitious!

42. In your opinion, are there any significant gaps, overlaps or inconsistencies between the Bathing Water Directive and the following EU policies, strategies and initiatives? (Multiple choice per row)

- Common Fisheries Policy **Don't know**
- Drinking Water Directive **Gaps**
- Environmental Impact Assessment and Strategic Environmental Assessment Directives **Don't know**
- Environmental Quality Standards Directive **Don't know**
- EU Biodiversity Strategy **Gaps**
- Floods Directive **Gaps**
- Ground Water Directive **Gaps**
- INSPIRE Directive **Don't know**
- Marine Strategy Framework Directive **Gaps**
- Maritime Spatial Planning Directive **Gaps**
- Nitrates Directive **Gaps**
- Port Reception Facilities Directive **Gaps**
- Ship-source Pollution Directive **Gaps**
- Single-use Plastics Directive **Gaps**
- The European Green Deal **Gaps**
- Urban Wastewater Treatment Directive **Gaps**
- Waste Framework Directive **Gaps**
- Water Framework Directive **Gaps**
- Zero Pollution Action Plan **Gaps**
- Other **Gaps**

*If you selected "other", please specify below

All EU policies related to chemical pollution, whether they regulate the use of substances (REACH,...) or establish frameworks for certain activities (Cosmetics, PAC,...), should be linked to the BW Directive.

Gaps represent a lack of ambition and means to support the effective implementation of the BW Directive.

43. Feel free to elaborate and provide examples to justify your answer to Question 42.

- **Marine litter is not included in the classification of bathing sites (Gaps in relation to Waste Framework Directive and Single-use Plastic Directive)**
- **Environmental parameters are missing from the BWD (Gaps in relation to Water Framework Directive, EU Biodiversity Strategy, Marine Strategy Framework Directive)**
- **Chemical pollutants are not monitored, lack of measures to limit chemical pollution at source (Gaps in relation to REACH, Nitrates Directive, Zero Pollution Action Plan...)**

44. How important is it to get stronger mutual support between the Bathing Water Directive and the legislation and policies in the following sectors?

- *Water industry **Very important**
- *Maritime spatial planning **Very important**
- *Coastal tourism **Very important**
- *Climate policies **Very important**
- *Blue economy **Very important**
- *Emissions/pollution control **Very important**
- *Agricultural policies **Very important**

- *EU Regional policies **Very important**
- *Research policies **Very important**
- *Space policy (satellite imagery) **Very important**
- *Waste policy **Very important**
- *Common fisheries policy **Very important**
- *Other **Very important**

*If you selected “other”, please specify below

All EU policies related to chemical pollution, whether they regulate the use of substances (REACH,...) or establish frameworks for certain activities (Cosmetics, PAC,...), should be linked and stronger support the BW Directive.

45. Feel free to elaborate your answer on the mutual support (or lack of) between the BWD and these policies listed in Question 44.

- **BWD should have regulations adapted to all the activities on the coast (not only bathing) and MSPD support in this spatial planning and activities definition**
- **Management of algal blooms in direct relation to climate change**
- **Emission/pollution control: systematic search for sources of pollution**
- **Water industry: improved water treatment and promotion of alternative wastewater facilities and management models**
- **Waste is pollution so why not downgrade a bathing area impacted by waste**

46. In your opinion, how important has the Bathing Water Directive been for strengthening collaboration and cooperation to protect Europe’s bathing waters among the following partners?

- Among EU Member States **Very important**
- With non-EU countries **Not at all important**
- Between/with private sector entities **Not at all important**
- Between/with scientific institutions **Moderately important**
- Between/with other stakeholders, like NGOs, industry **Slightly important**
- Between/with government bodies responsible for different policies **Slightly important**

47. Do you consider the following actions necessary to be considered in a possible revision of the Bathing Water Directive?

- *Alignment of the scope of the Bathing Water Directive to the needs resulting from environmental objectives of the European Green Deal, the EU Biodiversity Strategy for 2030, and the Zero Pollution Action Plan. **Very important**
- *Alignment of the scope of the Bathing Water Directive to the needs resulting from health challenges included in WHO recommendations on scientific, analytical and epidemiological developments relevant to the parameters for bathing water quality in the Bathing Water Directive (2006/7/EC) **Moderately important**
- *Alignment of the scope of the Bathing Water Directive to the needs resulting from health challenges included in WHO Guidelines on Safe recreational Water Quality (health risks due to harmful algal blooms and other microbial hazards, health risk due to pathogens in beach sand, chemical hazards, as well as aspects of aesthetic

and nuisance important in the public's perception of a recreational water area.

Very important

- *Alignment of the scope of the Bathing Water Directive to the needs resulting from societal and well being challenges (growing number of people performing water sport activities, beach recreation and relaxation throughout the year) **Very important**
- *Revision of classification system **Very important**
- *Update of the list of parameters **Very important**
- *Revision of Bathing Water Directive provisions regarding the identification of bathing sites (definition of a large number of bathers, current limitation of the scope to bathers only) **Very important**
- *Revision of Bathing Water Directive requirements regarding management measures taken by Member States (e.g. short term pollution events, ways of improving bathing water quality at 'poor' and 'sufficient' bathing sites). **Very important**
- *Revision of Bathing Water Directive provisions regarding the level and timeliness of information provided to the public **Very important**
- *Revision of Bathing Water Directive provisions regarding public participation (citizens' involvement in the process of identification of bathing sites) **Very important**
- *Revision of Bathing Water Directive provisions regarding provision of information to the public **Very important**
- *Raising attractiveness of the bathing site by adding criteria, which on top of bathing water quality, would have impact on the classification of the bathing site (See the Blue Flag Programme criteria e.g.: provision of environmental education activities for beach users; provision of information relating to local eco-systems and environmental phenomena, facilities for the separation of recyclables waste materials; access and facilities provided for the physically disabled). **Slightly important**

48. In your opinion, the following aspects of the Bathing Water Directive reporting should be increased, maintained or decreased?

- Number of parameters for water sampling **Increased**
- Number of samples required per bathing season **Increased**
- Number of bathing seasons required for the classification **Decreased**
- Frequency of Commission assessments **Increased**
- Scope and detail of the information reported by Member States **Increased**

49. *Article 14(3) of the Bathing Water Directive requires that the review of the directive should look into whether it would be appropriate to phase out the 'sufficient' classification. Should 'sufficient' classification be maintained?

- Yes
- **No**
- No opinion
- Don't know

50. If you wish, please elaborate your response to Question 49.

The methods of classification of bathing waters must be reviewed in order to ensure the effective preservation of users' health and the protection of the environment.

Thus, monitoring and classification must include new parameters: HAB, chemical, waste.

The deletion, transformation or addition of a category must be considered in accordance with these new calculation methodologies in order to allow both a detailed and rigorous analysis of the sources of pollutions and coherence for citizens.

ADDITIONAL COMMENTS

If you wish to add further comments, within the scope of this questionnaire, please feel free to do so here.

Surfrider Europe has attached its Manifesto for Healthy Waters (short version). This document co-signed by over 50 structures details our common demands for the new Bathing Water Directive. You can find it on our website

In this question, Surfrider Europe invites you to leave of your own comment to express yourself. If you are a Surfrider Coastal Defender, a Surfrider WaterMan Tester, have examples of water quality management or poor quality areas or any other ideas or stories about water quality, please feel free to describe them at this stage of the questionnaire.

ABOUT SURFRIDER FOUNDATION EUROPE

SURFRIDER FOUNDATION EUROPE is a non-profit organisation whose purpose is to protect and showcase the importance of lakes, rivers, the ocean, waves, and coastlines. It currently has over 15,000 members and is active across 12 European countries through its volunteer-run branches. For 30 years, Surfrider Foundation Europe has been taking action in three areas of expertise: marine litter, water quality and public health, coastal management and climate change. For more information: surfrider.eu