



AGW Arbeitsgemeinschaft der Wasserwirtschaftsverbände in Nordrhein-Westfalen

To
Edit Herczog
Parlement européen
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Bergheim, 19th June 2013

Regulation of the European Parliament and of the Council on Measures to reduce the cost of deploying high-speed electronic communications networks
COM(2013)147 final

Dear Rapporteur Herczog,

We are writing to you as leader of discussion on the aforementioned Draft Regulation, which also seeks to address the usage of drinking water and waste water discharge pipelines for the integration of telecommunication installations. As representatives of the Water Management Associations in the German Federal State of North Rhine-Westphalia, we are responsible in part for water supply and waste water disposal. We would therefore like to share with you our comments on the aforementioned discussion point. Council Directive 98/83/EG on the quality of water intended for human consumption, affords great consideration to protecting citizens from microbiological contamination. To ensure this priority is upheld, many regulatory frameworks have been placed throughout the European Member States to ensure that the construction and maintenance of drinking water networks observe the strict hygiene standards. There is currently no regulation in place to govern the installation or maintenance of pipelines in the field of telecommunications. In our view, this renders necessary an entirely new evaluation and extensive examination of the relevant networks. Unfortunately, we have concluded that the EU-Commission has also failed to address this issue in its relevant **working documents (SWD/2013/0073 and SWD/2013/0074)**. The same applies regarding the medical implications of installing and maintaining such pipelines and waste water treatment networks. As this is a matter of preserving hygiene standards in the interests of human health, we consider a prior evaluation of these aspects crucial to any decision.

In view of the creating publically accessible infrastructure atlases with layout plans of drinking water and waste water network facilities as proposed in the Draft Regula-

tion, it is important to first assess whether the facility concerned has a particularly sensitive or susceptible infrastructure. In such case, the facility in question should be excluded from public access in order to ensure public safety and to avoid compromising public security.

We hereby kindly request, that you take our comments into consideration prior to concluding the Regulation, and remain available to you in case of any questions.

With best regards,

A handwritten signature in black ink, appearing to be 'U. Oehmichen', written in a cursive style.

Dr. Ulrich Oehmichen