

Site-applied materials (cement linings, coatings, mortars, sealing systems, lining with cured-in-place-pipes, lining with adhesive-backed hoses)

The final products only come into existence at the place of installation. The conformity assessment modules in Delegated Regulation (EU) 2024/370 are designed for serial factory production and are structurally incompatible with site-applied works. Without amendment, every emergency repair to a public drinking water network would legally require prior involvement of a notified body, which would place water suppliers in an irresolvable conflict between EU compliance and their duty to maintain continuity of supply.

Hafnium in enamelled water heaters and water storage tanks

Hafnium is a technically unavoidable trace constituent of zirconium-based raw materials used in enamel coatings of water heaters and water storage tanks as well as in enamelled fittings and valves for drinking water. It is not on the European Positive List; not for safety reasons, but because no Member State formally notified it in due time. As a result, enamelled water heaters and water storage tanks cannot be EU-certified, despite a long history of safe use. Disruptions in availability would directly affect residential and public buildings, including the deployment of heat pumps, as water storage tanks are an essential component of heat pump systems.

Glass fibre reinforced materials in water infrastructure

Glass fibres have been used safely in pipes, tanks and structural components for over 50 years. The European Positive List allows glass fibres but does not list any glass composition technically suitable for producing them - a clear administrative inconsistency. As a consequence, an entire material category cannot demonstrate compliance, threatening construction, rehabilitation and maintenance of drinking water infrastructure across the EU.