



Implementation of Article 11 of the EU Drinking Water Directive

Initial situation

Article 11 of the new EU Drinking Water Directive introduces the first Europe-wide harmonised standards for materials and products in drinking water installations. The aim is to enable the free movement of goods within the EU and at the same time ensure high hygiene requirements. The European Chemicals Agency (ECHA) will assume responsibility for the assessment and authorisation of these materials, which was previously regulated differently in each country.

Important changes at a glance

1. Transition to EU-wide regulations (2021-2034)

- **By 2021:** EU member states submitted their national test and assessment methods and positive lists for materials based on these methods to ECHA. Based on this information, adapted, EU-wide test and assessment methods were created and, among other things, the first EU metal list (valid from 2027) was derived. The latter takes particular account of the lower limit values for lead in drinking water.
- **2021–2026:** During this period, national material tests and declarations of conformity for drinking water products based on them will continue to apply.
- **From 2027:** New materials (developed after 2021) can be submitted to ECHA for drinking water authorisation from 2027. From this date, it will also be possible to obtain an EU drinking water product certificate. This applies to drinking water products that fulfil both the material-related and all other criteria of the EU-wide authorisation conditions.
- **From 2033:** Only products with an EU certificate may be used in drinking water installations.
- **2034:** The first EU metal list expires. Authorisations for materials included on this list must be reapplied for.

2. Previously marketable materials containing lead

- All lead-containing alloys currently available on the market do not fulfil the new EU limit value for lead migration into drinking water (in accordance with EN 15664). Products made from these materials will be excluded from use in drinking water after transitional periods.

- **In Germany:** Components made from these lead-containing materials may only be used until 12 January 2028.
- **In other EU Countries:** Use is permitted until 2032, provided national proof of conformity is available.
- **From 2033:** The use of components made from these materials is prohibited in all EU countries.

3. EU-compliant materials

- This includes both materials already notified before 2021 („old“) and newly developed materials that fulfil the material-related EU criteria.
- Between **2021–2026:** National material authorisations remain relevant as no new materials are reviewed by ECHA.
- **From 2027:** New materials (developed after 2021) can be assessed by ECHA for EU-wide applicability and included in the second list of metals. This will replace the first list after 2034.

Background: Why these changes are being made?

Until now, EU countries had their own rules for the authorisation of materials and products in drinking water installations. These national differences made cross-border trade more difficult and led to a patchwork of requirements. The EU Drinking Water Directive creates a standardised legal framework for the first time. This gives manufacturers, planners and operators long-term planning security, while guaranteeing a high standard of hygiene for consumers.

The period until 2026 will allow companies to gradually adapt to the new regulations. Established materials will be critically reviewed and new, more innovative materials will be given access to the market.

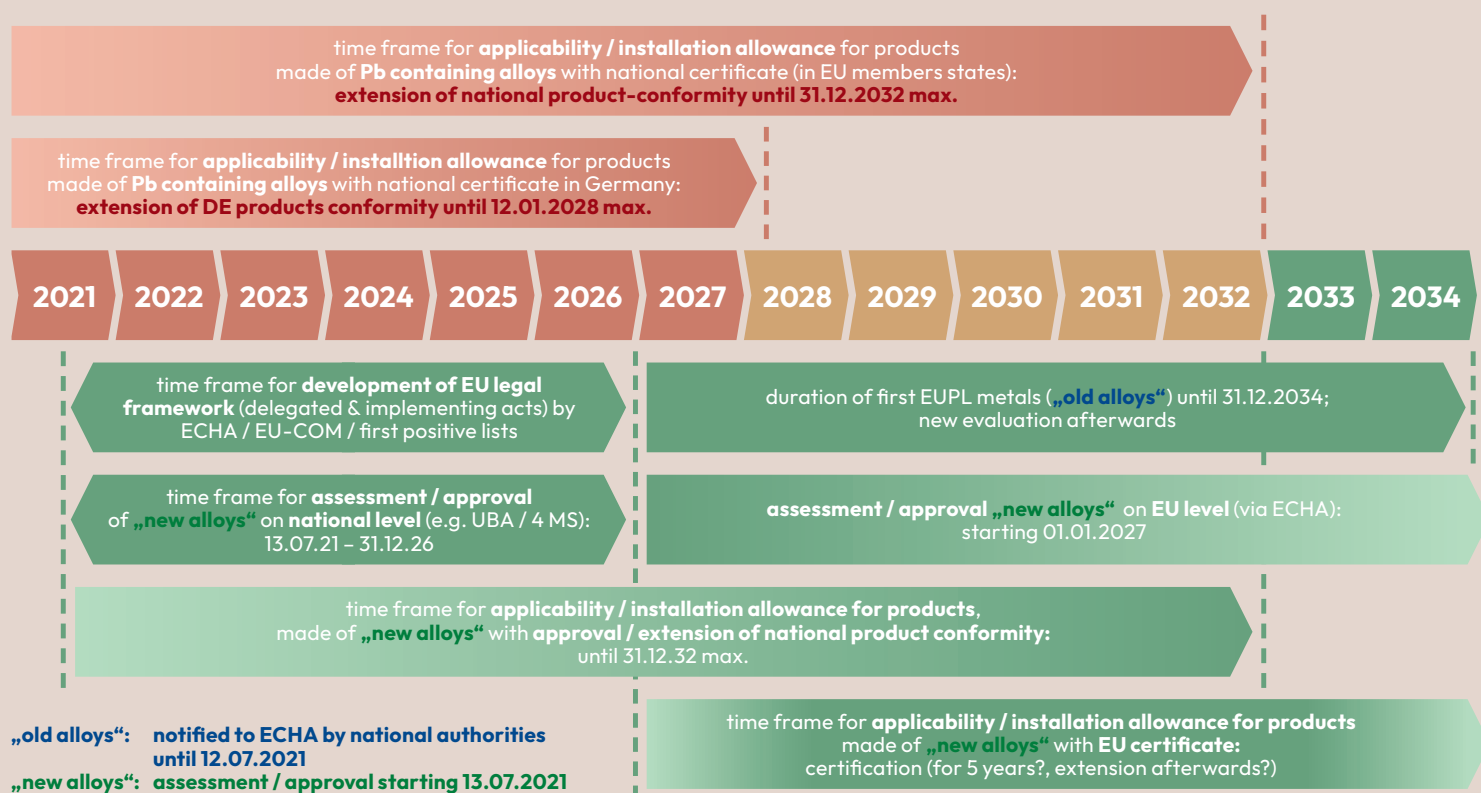


Figure 1:

Overview of the duration of drinking water product certificates of conformity and testing and authorisation of metallic materials in the EU

Explanation of the graphic

Period 2021–2034:

- National metal positive lists were reviewed by the ECHA and those materials that do not fulfil the new, EU-wide conditions were removed. The remaining alloys form the basis for the first EU-wide metal positive list.
- Between 2021 and 2026, only national tests can be carried out for materials. From 2027, materials can be tested at the EU level. EU product certificates will only be introduced from 2027.
- From 2033, only EU-certified products may be used.

Red markings:

- These relate to materials containing lead that were previously commercially available, but which are gradually being phased out of use. In Germany, the use of products made from these materials will end in 2028, in other countries in 2032, after which they will no longer be permitted in the EU.

Green markings:

- Show the transition periods and long-term use of materials that meet the new EU criteria. These materials can also be included in the second metal list after 2027.

Conclusion

Article 11 of the EU Drinking Water Directive creates a clear and binding basis for drinking water installations. It is essential for manufacturers and processors of metallic materials to comply with the deadlines and requirements. The new rules make it possible to market hygienically safe products throughout the EU, while consumers benefit from harmonised standards. Products are labelled with the following symbol:



Products with this labelling can be used in Germany without further proof for the installation and maintenance of drinking water installations.

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