

## **Annex 1**

### **Review on the existing legal situation and proposed scenarios**

**Table 1 – Existing legislation regarding wastewater discharge, abstraction of surface and ground water**

Laws	On pollution	Law on subsoil	Law on nature resource taxes	Law on water management
CM Regulations	<p>CM 34 – On emissions of pollutants into the aquatic environment</p> <p>CM 294 – “On Application of Category A,B and C Polluting Activities and Permitting of Category A and B Polluting Activities”</p>	<p>CM 155 – On Water Use Permits</p>	<p>CM 155 – On Water Use Permits</p>	<p>CM – WRUP</p>
<b>REGULATED ACTIVITIES</b>	<p><i>Waste water discharge- for Category A and B activities</i></p> <p><i>Water abstraction- for Category A and B activities</i></p> <p><i>Groundwater abstraction - for Category A and B activities</i></p>	<p><i>Groundwater abstraction - over 10 m<sup>3</sup>/day</i></p>	<p><i>Waste water discharge- for all discharges over 5 m<sup>3</sup>/day</i></p> <p><i>Surface water abstraction - over 20 m<sup>3</sup>/ day if surface water regime is not affected</i></p> <p><i>Groundwater extraction- over 10 m<sup>3</sup>/day</i></p>	<p><i>Water resource use</i></p>

**TABLE 2A - Scenario - 1:**

**According resource use (waste water discharge/water abstraction)**

Pollution law	Water management law	Subsoil law
<p><b>CM 294 – Permitting order for activities A and B category</b></p>	<p><b>CM – WRUP</b></p>	<p><b>CM – WRUP</b></p>
<p><b>Waste water discharge- for activities A and B category</b></p>	<ul style="list-style-type: none"> <li>• <i>Surface water abstraction - over 10 m<sup>3</sup>/ day if surface water regime is not affected</i></li> <li>• <b>Groundwater abstraction- over 10 m<sup>3</sup>/day</b></li> <li>• <b>Other water use types</b></li> </ul>	<ul style="list-style-type: none"> <li>• <b>Groundwater abstraction- over 10 m<sup>3</sup>/day</b></li> </ul>
<p><b>New CM Regulations ( or amendments in CM Regulation 34)</b></p> <ul style="list-style-type: none"> <li>• <b>Waste water discharge- for</b></li> <li>• <b>the rest activities over 5 m<sup>3</sup>/day</b></li> </ul>		

**TABLE 2B - Scenario – 2:**

**According resource use (Waste water discharge / water abstraction)**

Pollution law	Water management law	Subsoil law
<p><b>CM 294 – Permitting order for activities A and B category</b></p>	<p><b>CM – WRUP</b></p>	<p><b>CM – WRUP</b></p>
<p><b><u>A and B category activities</u></b></p> <ul style="list-style-type: none"> <li>• waste water discharge;</li> <li>• Surface water abstraction;</li> <li>• Groundwater abstraction</li> </ul>	<p><b><u>C category activities</u></b></p> <p><b>Waste water discharge;</b></p> <ul style="list-style-type: none"> <li>• Surface water abstraction;</li> <li>• Water abstraction over 10 m<sup>3</sup>/day if water regime is not affected;</li> <li>• Water abstraction for the rest activities over 10 m<sup>3</sup>/day;</li> <li>• Waste water discharge for the rest activities over 5 m<sup>3</sup> day;</li> <li>• <u>other water use types</u></li> </ul>	<p><b>Groundwater abstraction- over 10 m<sup>3</sup>/day</b></p>

**Table 2C - Scenario - 3:**

**According polluting activity and resource use**

Pollution law	Water management law	Subsoil law
<p><b>CM 294 – Permitting order for activities A and B category</b></p>	<p><b>CM – WRUP</b></p>	<p><b>CM – WRUP</b></p>
<p><b><u>A and B category activities</u></b></p> <ul style="list-style-type: none"> <li>• waste water discharge;</li> <li>• Surface water abstraction;</li> <li>• Groundwater abstraction</li> </ul>	<p><b><u>C category activities</u></b></p> <ul style="list-style-type: none"> <li>• Surface water abstraction;</li> <li>• Water abstraction over 10 m<sup>3</sup>/day if water regime is not affected;</li> </ul>	<p><b><u>Groundwater abstraction-</u> over 10 m<sup>3</sup>/day</b></p>
<p><b>New CM Regulations</b></p> <ul style="list-style-type: none"> <li>• waste water discharge for the rest polluting activities over 5 m<sup>3</sup>/day (also C)</li> </ul>	<p><b><u>Water abstraction for the rest activities-</u></b></p> <ul style="list-style-type: none"> <li>• over 10 m<sup>3</sup> day</li> </ul> <p><b><u>Other water resource use types</u></b></p>	