



FRANCE

The draft French Loire-Bretagne RBMP was assessed in April 2021. Overall, the draft RBMP relies largely on article 4(5) exemptions and it sets out lower objectives for 39.5% of the water bodies. Moreover, its budget is far too low to achieve good status, which is also due to the non-consideration of environmental costs in cost recovery. In some technical areas, for example hydromorphological pressures and climate adaptation, the RBMP has significantly improved compared to the previous plan. The draft RBMP does not provide information on the status of implementation and effectiveness of the second RBMP's PoM. This assessment is currently being finalised at a local scale, and will only be included in the draft RBMP at a later stage. Five of the selected topics are considered in the draft RBMP as Significant Water Management Issues, and the main findings of the assessment are detailed below:

Removal and adaptation of barriers:

Compared to the previous RBMP, more data has been collected from three databases which find 24,877 barriers. Meanwhile, more pressures relating to barriers have been identified – a rise of 13% of water bodies classified as under pressure from barriers. These pressures are determined by examining sediments, longitudinal and lateral connectivity. The draft RBMP does not include a list of barriers for which the usage permits will expire and must be revised during the 2021-2027

period. The draft RBMP identifies barriers that should be removed as a priority, including priority zones for the European eel. The draft RBMP states that a cost analysis and a monitoring plan should be undertaken. The PoM addresses 1,064 (4%) of all barriers included in the inventory. 34% of the PoM budget (€1.287bn) is allocated to measures for freshwater ecosystem restoration, among which a majority concern actions on barriers or actions on water bodies that have a significant hydrological impact during low-water periods. Still, the budget specifically dedicated to the removal and adaptation of barriers is not yet known.

River and wetland restoration: The draft RBMP provides an overall description of the status of protected freshwater ecosystems and defines the specific water quantities and qualities required for achieving good status. The criteria used to establish restoration priorities are clearly explained – for water bodies with protected areas and species, the main pressures and remedial actions are detailed. 16% of the measures in the PoM concern a protected area however, no references are made to nature-based solutions and only very generically to natural water retention measures. The funds from the Water Agency represent on average 50% of the cost of freshwater ecosystem restoration.

Water allocation and abstraction control:

All significant water abstractions are identified – urban, irrigation, industry, energy production, livestock, feeding of navigation channels – and an exploitation index is determined for each water body, even if some data is missing on seasonal variations of water abstractions. A national database for water abstraction is already implemented but should be further developed. 18 new reservoirs are planned, and there are no assessments of their impact on river flows, even if seven conditions are included to minimise their impact on hydrology. The draft RBMP recommends reviewing new water abstraction permits every 10 or 15 years. No detailed information is available on the intensity of abstraction controls.

Drought management and climate proofing:

The draft RBMP incorporates the findings of the climate change plan ([PACC Loire-Bretagne](#)), including a sensitivity analysis of vulnerable water-use sectors and forecasting, including ecological flows. It selects robust adaptation measures which maximise cross-sectoral benefits. 47% of the changes in the draft RBMP have been made to adapt to climate change. However, the draft RBMP does not include a forecast of the economics of water supply and demand. Regarding drought management,

indicators are based on flow thresholds quantified at each nodal point, with two types of thresholds established for monitoring minimal flows and crisis management. The draft RBMP focuses on saving water, limiting waste, reusing wastewater and developing winter storage – which must include a preliminary study on water availability under climate change conditions.

Agriculture: The draft RBMP includes an assessment of the main pressures from agriculture at the water body level. Gaps in achieving the objectives of the Nitrates Directive are recognised. The reduction of diffuse pollution is one of the main priorities of the draft RBMP and it has been allocated 30% of the budget (€1 bn), with €0.4 bn targeting priority catchments that provide drinking water, including voluntary – such as organic farming – and mandatory measures.

Economic instruments and budget

adequacy: Financial cost recovery figures are only provided for agriculture (92%), industry (94%) and individuals (98%). Environmental and resource costs are not considered, which is justified by uncertainties in allocating costs. The overall PoM budget (€3.6 bn) is far too low to achieve the objectives of the WFD, with the Water Agency providing 50% of it. Not all budget details are yet available in the draft RBMP.

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THE DRAFT
LOIRE-
BRETAGNE
RBMP HAVE
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Loire river. © SOS Loire vivante, ERN.

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	Topic	Loire
1	Removal and adaptation of barriers	
	1. Identification of the problem	
	2. Prioritisation	
	3. Cost-benefit analysis and monitoring plan	
	4. Ambition	
2	Hydropower	
	1. Pressures and sectors	
	2. Inventory of planned projects	
	3. Justification and exemptions	
	4. Criteria and thresholds	
	5. Plans for refurbishment and decommissioning	
3	Inland navigation	
	1. Pressures and sectors	
	2. Inventory of planned projects	
	3. Justification and exemptions	
	4. Criteria and thresholds	
	5. 'Working with nature'	
4	Freshwater ecosystem protection and restoration and NBS	
	1. Protected areas and their status	
	2. Prioritisation	
	3. Restoration targets	
	4. Nature-based solutions (NBS)	
	5. Natural Water Retention Measures (NWRM)	
	6. Sound financial mechanism	
5	Water allocation and abstraction control	
	1. Identification of significant water abstractions	
	2. Prospects of new water abstractions, related infrastructure and land uses	
	3. Review of abstraction permits	
	4. Abstraction control	
6a	Drought management	
	1. PoM "climate checks"	
	2. Drought management plans	
6b	Flood management	
	1. PoM "climate checks"	
	3. Link with the Floods Directive	
	4. Land use and flood management	
7	Agriculture	
	1. Assessment of pressures	
	2. Gap analysis and measures	
	3. Diffuse pollution	
8	Coal mines (and combustion)	
	1. Assessment of the problem	
	2. Priority hazardous substances	
	3. Climate change	
	4. Justification and exemptions	
	5. Cost recovery	
	6. Liabilities	
9	Economic instruments and adequacy of budget	
	1. Cost recovery calculation for sectors	
	2. Cost recovery rates and exemptions	
	3. Budget	
10	Exemptions	
	1. Number of exemptions	
	2. Gap analysis	
	3. Art. 4(4) and 4(5) exemption justifications	
	4. Article 4(6) exemption justifications	
	5. Article 4(7) exemption justifications	
11	Review and update on the implementation of the previous RBMP	
	1. Implementation of measures	
	2. Effectiveness of measures	



THE REDUCTION OF DIFFUSE POLLUTION IS ONE OF THE MAIN PRIORITIES OF THE DRAFT LOIRE-BRETAGNE RBMP AND IT HAS BEEN ALLOCATED 30% OF THE BUDGET (€1 BN).

		LEVEL OF PERFORMANCE				
		high	good	moderate	poor	N/A
RELEVANCE	Not applicable or relevant for the RBD					
	This problem/ challenge has already been solved in the second RBMP					
	One of the many problems/challenges in this RBD					
	One of the Significant Water Management Issues (SWMI)					
	The main problem/challenge in this RBD					

Table 17: Overview of the performance of the draft 2022-2027 RBMP Loire-Bretagne (France) on key topics by indicator.