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CONVENTION ON THE CONSERVATION OF EUROPEAN WILDLIFE  
AND NATURAL HABITATS

**Standing Committee**

32<sup>nd</sup> meeting  
Strasbourg, 27-30 November 2012

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**Possible file**

**THREATS TO THE RHONE STREBER (*ZINGEL ASPER*) IN  
THE DOUBS (FRANCE) AND IN THE CANTONS OF JURA  
AND NEUCHÂTEL (SWITZERLAND)**

***REPORT BY FRANCE NATURE ENVIRONNEMENT***

*Document prepared by  
France Nature Environnement*



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Ms Ivana d'Alessandro  
Biological Diversity Unit  
Directorate of Culture and Cultural  
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Council of Europe  
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FRANCE

Dear Members of the Standing Committee,

In 2010 the karst rivers in Franche-Comté experienced a major salmonid kill, particularly on the upper Doubs – including the part on the French-Swiss border – and on the Loue. A similar fish kill has recurred every year since, spreading to the river Bienne, in the Jura department.

Several fish-counting operations, most recently in July 2012, have confirmed a collapse in fish populations, particularly on the Loue.

All the scientific studies carried out on the Loue since the 1970s have indicated a gradual degradation of the environment, with a reduction in fish species and entomofauna.

You will find enclosed various documents relating to this environmental degradation, as part of a general strategy to alert the French Government to the problem (the letter from SOS Loue & Rivières Comtoises to the Ministry of the Environment dated 12 February 2012 has as yet received no reply).

**With regard to the biological aspects of the question**, the Prefecture and the Doubs General Council have invested considerable efforts since the beginning of this crisis. These include commissioning studies to improve scientific knowledge, as recommended by the group of national experts led by the French National Agency for Water and Aquatic Environments (ONEMA). These studies will take several years.

For the Loue, a joint decision has been taken by the Government and the Doubs General Council to expand governance of the river, taking effect in 2013. These provisions were announced by the two bodies at the Loue conference held on 11 October 2012 in Ornans. This shows a real determination to take effective action on the causes of the problem. It remains to be seen what the actual effects of this action will be in the years to come.

But in our view this joint strategy by the Government and the General Council still focuses too narrowly on the solutions recommended by the successive Water Development and Management Master Plans (SDAGEs) and Water Development and Management Plans (SAGEs), which have led to this state of affairs and have therefore proved themselves to be flawed. We believe that these flaws are capable of thwarting the efforts that will be made to counter other types of pollution. In our view this applies to the question of farming on karst plateaus, and particularly the abolition of milk quotas. Milk producers in the trade association that manages the AOP Comté protected origin label are strongly focused on maximising productivity, and have announced their intention to increase milk production by 20%. This attitude is encouraged by the European Commission's Directorate-General for Competition in Brussels, despite the fact that most of the practices employed by AOP Comté do not respect the fragile balance of karst landscapes. On shallow soil (which represents 60 to 70% of the AOP area), the grasslands are so eutrophic that floral biodiversity is severely reduced – a clear breach of the Habitats Directive.

We believe that the degradation of the aquatic environment represents a real obstacle to saving the apron (*Zingel asper*) in all these karst rivers where it lived 40 years ago.

The lower Loue – the last 25 miles of its course in the Jura department – was cleaned and straightened almost 50 years ago. See appendix 1, “The apron issue on the lower Loue”.

**With regard to the physical environment**, we must condemn the French Government’s failure to impose restoration of the former meanders on this 25-mile stretch of the Loue. This plan has been constantly slowed and re-examined since 2003, when it was formally adopted by the Jura Departmental Directorate for Agriculture (DDA) and the farming unions. Moreover, the irrigation capacity in summer periods has recently been multiplied by a factor of three on this section of the lower Loue. (Water is taken from the alluvial groundwater, which is already severely depleted due to excessive deepening of the river.)

Water releases from the hydroelectric dams on the upper Doubs are the **third matter** addressed in the summary report by the Association for Fishing and Protection of the Aquatic Environment (AAPPMA) “La Franco-Suisse” in October 2012 (see links below). **In these three areas**, we would emphasise the failure of the Government to honour its commitments concerning the apron under the Bern Convention.

For all of the above reasons, our collective would like to include these additional elements in the complaint made by Pronatura concerning the Rhône apron. We would invite the Committee to examine the relevance of this information and to carry out its own on-site investigations.

We look forward to hearing from you.

Yours sincerely

For the SOS Loue et Rivières Comtoises Collective

Marc Goux

***Appendices:***

- 1 - The apron issue on the lower Loue (enclosed)
- 2 - Letter from SOS Loue & Rivières Comtoises to the Ministry of the Environment dated 12/02/12
- 3 - Summary report by La Franco-Suisse (available to download):  
<http://www.arrete.net/franco-suisse-rapport-de-synthese-09-10-2012>
- 4 - New information since the agreement on the apron plan

## Appendix 1



Il est exceptionnel que la raréfaction d'une espèce piscicole ne soit due qu'à un seul facteur identifiable. La plupart du temps, les atteintes qui fragilisent une population sont multiples, s'aggravent mutuellement et la résolution d'une seule d'entre elles a peu de chance d'améliorer notablement la situation. Toutefois, en raison de leurs besoins et de leurs biologies différentes, les espèces de poissons qui cohabitent dans un secteur de rivière réagissent différemment à l'une ou l'autre des nuisances qui les touchent.

Dans la Loue, la dégradation générale de la qualité de l'eau constitue une des causes incontestables des atteintes à toutes les composantes du peuplement pisciaire mais la modification physique du milieu est plus dommageable pour certaines espèces que pour d'autres.

En effet, si l'artificialisation physique de son lit concerne tout le cours de cette rivière sa nature, son ampleur et leurs effets sont différents suivant les secteurs.

- Sur la « haute » et la « moyenne » Loue (de la source à Arc-et-Senans) ce sont les barrages, les traversées d'agglomérations et les secteurs où les routes longent la rivière qui constituent l'essentiel de l'artificialisation du lit, son tracé n'ayant été que peu ou pas modifié.

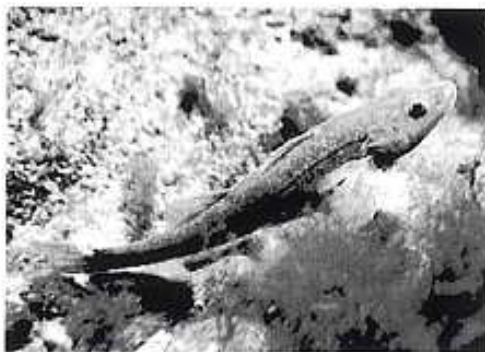
- Sur la « basse » Loue, c'est un bouleversement total qui a été "commis" il y a quelques décennies : suppression de méandres, annulation du caractère "chevelu" de cette rivière, endiguement avec tous les effets de ce type d'aménagement : déstabilisation du substrat, mise en vitesse, enfoncement du lit et donc, uniformisation de l'écosystème dans une configuration peu biogène.

Cette situation fragilise particulièrement les espèces inféodées au substrat et dont les performances de nage sont médiocres.

C'est le cas de l'Apron du Rhône (*Zingel asper*), espèce en voie de disparition sur l'ensemble du bassin du Rhône où il était presque partout présent mais dont la Loue abrite une des rares reliques de population. Celle-ci se répartit sur une quarantaine de kilomètres et sa limite aval coïncide avec le début de la zone "canalisée".

Ce constat n'a rien d'étonnant étant donné la biologie et les "performances" de cette espèce. L'Apron vit sur ou dans le substrat (galets, graviers), se nourrit d'invertébrés benthiques, affectionne des vitesses inférieures à 0,5 m/s et il est certain que sa disparition sur cette section de la rivière est liée à la destruction de son milieu d'origine. Il n'est pas contestable que la dégradation de la qualité de l'eau sur l'ensemble de la Loue a également fragilisé cette espèce mais son maintien à l'amont immédiat de la zone canalisée dans des conditions physico-chimiques équivalentes est la preuve de l'impact particulier qu'ont eu, pour l'Apron, les travaux décrits plus haut. Il est à noter que la souhaitable renaturation de cette portion de rivière permettrait une recolonisation en raison de la présence d'un effectif en densité appréciable à proximité immédiate.

Partenaires



## Appendix 2



TECHNICAL DOCUMENT  
**Issue:**



# THE RHÔNE APRON ON THE LOWER LOUE

**BY MICHAËL PROCHÀZKA, RETIRED HEAD TECHNICIAN AT THE FRENCH NATIONAL AGENCY FOR WATER AND AQUATIC ENVIRONMENTS (ONEMA)**

It is highly unusual for the population decline of a fish species to be due to a single identifiable factor. In the majority of cases there are multiple self-reinforcing factors behind the weakening of a population, and resolving just one of them is unlikely to lead to any significant improvement in the situation. But given their differing requirements and biological make-ups, the various species of fish that live in a given stretch of river react differently when their habitat is damaged.

In the Loue, the general deterioration in water quality is undoubtedly one of the stressors affecting all species of fish, but the physical changes to the environment are more harmful for some species than for others. Although the man-made degradation of the river bed is clearly affecting the entire river, the nature, scale and effects of this process differ from section to section.

- On the **upper** and **middle** Loue (from its source to Arc-et-Senans), the dams, thoroughfares and stretches where roads run along the river are the main factors in the man-made degradation of the river bed. The river's course has barely been changed in these sections.
- The **lower** Loue was subjected to more serious upheavals a few decades ago: its meanders were removed, meaning that the river lost its "veined" appearance, and the river was dammed, leading to a host of unwanted effects – substrate destabilisation, changing flow speed, deepening of the bed and therefore an artificial homogenisation of the ecosystem.

Species that live close to the substrate and are weaker swimmers are particularly vulnerable in these conditions. This is the case for the Rhône apron (*Zingel asper*), a species that was once found all over the Rhône basin but has now virtually disappeared. The Loue is home to one of the rare surviving populations of this species, spread over a stretch of around 25 miles, with a downstream limit that coincides with the point where the canalised section of the river begins. This observation is hardly surprising, given the biological make-up and "performance" of this species. The apron lives on or in the substrate (made up of pebbles or gravel), feeds on benthic invertebrates and tends to swim at speeds slower than 0.5m/s. Its disappearance from this part of the river is clearly linked to the destruction of its original habitat. There is no disputing the fact that the deterioration in water quality across the Loue as a whole has also weakened this species, but the fact that there is a surviving population immediately upstream from the canalised area, where it lives in identical physico-chemical conditions, is evidence of the specific impact on the apron of the structural work described above. The restoration of this section of river would enable the species to recolonise the river, given that there are significant numbers of apron living in close proximity.

### Appendix 3



## AAPPMA LA FRANCO-SUISSE 25470 GOUMOIS

Goumois, 9 October 2012

### 1. Introduction

The Association for Fishing and Protection of the Aquatic Environment (AAPPMA) known as “La Franco-Suisse” is responsible for a beautiful 17-mile fishing stretch on the river Doubs, on the

French-Swiss border near Goumois. But in this paradise for trout and grayling, things aren’t what they used to be: river managers have been concerned for several years at the alarming deterioration in water quality, the disastrous effect of dams on river flow management and the diminishing natural fish stocks in the river. Once a shining example of biodiversity and a favoured spot for anglers from all over France and Europe, the banks of the Doubs on the French-Swiss border are now starting to resemble an environmental disaster zone. Pollution and dam water releases have sapped the vitality of the Doubs, depleted its fish populations and driven its anglers away. Although the alarm has been raised several times at various assemblies in which La Franco-Suisse is a stakeholder, the situation is continuing to worsen.

### 2. An overview of the issues affecting the French-Swiss Doubs

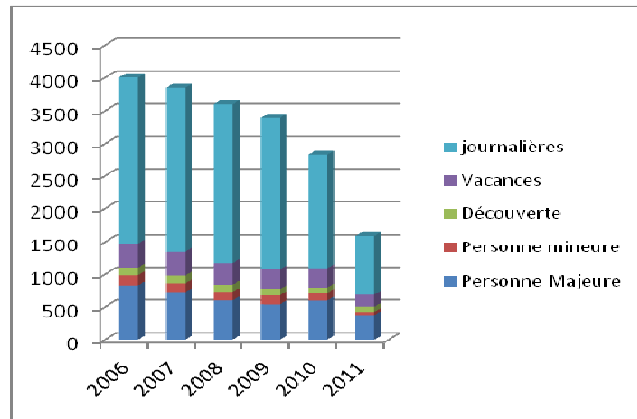
The health of the Doubs and its fauna is undermined by a barrage of stresses year on year, but two factors particularly stand out: water quality and flow disruption.

**Water quality:** The Doubs, even its upper part, is subject to intense anthropogenic pressure. Rapidly growing towns, the watch-making industry and the intensification of agriculture (albeit mountain agriculture) are all pushing this headwater river, which has a low self-purification capacity, to saturation. The dwindling numbers of invertebrates (up to 200 times fewer than baseline figures), the spread of algae (green algae, cyanobacteria, etc.) and the epidemics that have decimated brown trout and common grayling populations since 2010 are all signs that the river is reaching its limits.

**Flow:** There are three hydroelectric dams on the French-Swiss part of the Doubs. Whether releasing huge quantities of water or draining river banks or gravel bars, these structures have a devastating impact on aquatic fauna, which can be forced to climb the river banks to escape the fast-flowing current only to be left trapped on the banks a short time later after the water level suddenly falls again. Pollution is aggravated by artificial low flows in periods with no water releases, since the small quantities of water concentrate chemical substances and heat up more quickly.

These problems are leading to a decline in all species of fish, some of which are of high heritage value (brown trout, grayling, apron (*Zingel asper*), south-west European nase, lamprey, sculpin, stone loach, etc.). The apron, one of the species included in Appendix II of the Bern Convention, is verging on extinction and therefore should benefit from higher levels of protection for itself and its environment, but this is far from being the case.

The sales of fishing permits by La Franco-Suisse are in freefall (-50% in 5 years), threatening the very existence of the association in the immediate future. The small graph below shows the reduction in permits sold over the period 2006-2011. This is a perfect illustration of the declining interest in fishing in the Doubs, a direct reflection of the quality of the environment.



Public authorities in both Switzerland and France have proven incapable of addressing the situation and investing the necessary resources to reverse this trend. Anglers and conservationists have been presented with endless piles of studies, diagnostic assessments and case files, but no effective measures have been implemented. We have now reached 2012, the situation is going from bad to worse and those working to protect the Doubs are losing patience as they wait for any real signs of improvement.

### 3. Water quality

#### 3.1 Water quality report – 2010

Given the alarming situation in 2010 following the unprecedented spread of *Saprolegnia* in the trout and grayling populations, the association La Franco-Suisse compiled a report<sup>1</sup> which it submitted to public bodies and politicians.

#### 3.2 Water quality report – 2012

Although water quality is a vast, complex issue and it is impossible to treat the whole drainage basin in a short space of time, there are certain well-known troublesome areas which continue to feature in reports and analyses each year but fail to be addressed through specific measures.

Since so little headway is being made to save the French-Swiss Doubs, La Franco-Suisse has recently updated the report<sup>2</sup> with recent data, photos and videos. These offer conclusive proof that, despite our pleas and cries for help – in some cases dating back several years – there has been no progress or improvement.

On the contrary, the Swiss authorities have actually blamed the spread of *Saprolegnia* on anglers and their equipment.

**The decline in water quality is visible on a daily basis, and these diseases, which merely reflect the poor state of the water, are continuing to be detected. The condition of the Doubs is more worrying than ever, and real practical measures are still failing to be implemented.**

<sup>1</sup> AAPPMA “La Franco-Suisse”, October 2010. *Dossier pollution et maladies. Historique et observations visuelles des maladies et mortalités constatées sur le Doubs Franco-Suisse* [Report on pollution and diseases. Background and visual observations of diseases and deaths on the French-Swiss Doubs]

<sup>2</sup> AAPPMA “La Franco-Suisse”, October 2012. *Dossier pollution et maladies. Actualisation 2012* [Report on pollution and diseases. Update for 2012]



Dead fish, April 2011



The Doubs and its tributaries in a very poor state

## 4. River flows

### 4.1 Water release report – 2010 version

In April 2010, the association La Franco-Suisse sounded the alarm by drafting a report<sup>3</sup> with the support of various locally elected representatives who were concerned at the environmental degradation of the valley and the negative impact on fishing tourism. The lifecycle of all fish species in the Doubs, including the apron downstream, is affected by the irresponsible management of hydroelectric dams.

### 4.2 Update for 2012

Once again, in this area nothing has changed. We can only stand by and watch as the operation of these dams continues to cause irreversible damage on a daily basis. From the half-hearted measures implemented by dam operators to the press releases issued by Government departments, every effort is being made to convince us that there has been some improvement, but this is far from being the case.

So-called “miracle solutions”, and the core elements of the 2014 Water Regulation such as the “reregulation” or reduction of water releases via the compensating reservoir at Biaufond, have proven to be severely limited, particularly in the most recent test carried out in September 2012. It is very worrying that our authorities are sticking rigidly to these purported “solutions” – the only responses that have so far been given to the problem of dam water releases.

An updated list of our grievances is included in a new report.<sup>4</sup>



Water releases from the Châtelot dam: daily flow variation, September 2012

<sup>3</sup> AAPPMA “La Franco-Suisse”, April 2010. *Eclusées sur le Doubs Franco-Suisse : Vers la fin programmée d’un paradis touristique* [Water releases on the French-Swiss Doubs: The gradual end of a tourist paradise]

<sup>4</sup> AAPPMA “La Franco-Suisse”, April 2012. *Eclusées sur le Doubs Franco-Suisse : Vers la fin programmée d’un paradis touristique* [Water releases on the French-Swiss Doubs: The gradual end of a tourist paradise]

#### **4.3 There are other solutions**

Proposals have been made by the steering committee of the Framework Agreement on Improving the Flow of the Doubs suggesting solutions along the lines of version 2<sup>5</sup> of the Courret–Larinier report. These proposals have not received administrative and political approval as a solution for improving the ecosystem on the grounds that all that had been asked for was a review of the current situation. This resulted in a watered-down final version<sup>6</sup>, clearly demonstrating that no real effort was being made to find solutions.



*Recurrent fish deaths caused by extreme low flows due to the operation of dams and hydroelectric plants*

## **5. CONCLUSIONS**

The solutions presented by political authorities are seeking to safeguard economic interests to the detriment of environmental interests. Alternative solutions, which have been examined, are never considered.

For La Franco-Suisse

Its chairman, Christian Triboulet

The fishery officer, Patrice Malavaux

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<sup>5</sup> Courret D. and Larinier M., March 2008, version 2. *Suivi de l'amélioration du Doubs Franco-Suisse. Analyse hydrologique, état des lieux en 2005* [Monitoring of improvements on the French-Swiss Doubs. Hydrological analysis, situation in 2005]

<sup>6</sup> Courret D. and Larinier M., November 2008, version 3. *Suivi de l'amélioration du Doubs Franco-Suisse. Analyse hydrologique, état des lieux en 2005* [Monitoring of improvements on the French-Swiss Doubs. Hydrological analysis, situation in 2005]

## Appendix 4



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**Minister for Ecology, Sustainable  
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FRANCE**

### Re.:

Pollution of the Loue and other karst rivers in the  
Doubs sub-basin.  
Application of the Water Framework Directive  
- PETITION -  
Complaint filed with the European Commission's DG  
Environment

**Our ref.: C DÀP/H/U001**

Besançon, 12 February 2012

<p><b>Member associations</b></p> <p>AAPPMA de Crottenay Amicale de la Haute-Loue ANPER- TOS Association des Pêcheurs au Lancer Attac Haut-Doubs Club Comtois de Pêche à la Mouche Club Vosges Mouche Collectif Du champ à l'assiette Confédération Paysanne du Doubs Doubs Nature Environnement Fédération Départementale de Pêche 25 Fisheurs Comtois Franche-Comté Nature Environnement Haut-Doubs Écologie Humus Fonds pour la biodiversité La Franco-Suisse Loue vive Saône Doubs Vivants Sundgau Vivant Société d'Histoire Naturelle du Doubs Territoire Belfort Nature Environnement <b>with the support of the WWF</b></p>	<p>Dear Minister,</p> <p>On 10 January 2011 you were sent a petition containing a number of requests and questions concerning the severe pollution of the rivers in Franche-Comté (the LOUE and upper DOUBS in particular).</p> <p>This pollution has led to recurrent salmon deaths and massive growth of algae, particularly toxic cyanobacteria. This very alarming situation, first observed in spring 2010, continued throughout 2011, with an identical fish kill that autumn.</p> <p>A copy of this petition was also sent to the European Commission's Directorate-General for the Environment, which decided to file the case as a complaint under reference CHAP(2011)00429, dated 28/02/2011.</p> <p>Our first intention was to engage in a constructive debate with your Ministry or its local representatives, and this more coercive legal situation is to some extent beyond our control.</p> <p>However, we did believe that this additional pressure from Europe would result in greater transparency and efficiency from the Government (and its departments) on this matter.</p> <p>Our petition drew your attention to the livestock breeding that is the primary source of nitrogen and phosphorus in this basin and is directly linked to the invasive algae growth in our rivers.</p> <p>This farming is carried out in a fragile karst environment, on ground that is often porous, with manure spreading frequently taking place in adverse conditions given the region's long winters and rainy springs.</p> <p>On the matter of manure nutrients, we asked for the introduction <i>"of additional, more effective measures on a larger scale to <b>reverse the trend</b> and comply with the minimum requirements imposed on the French Government"</i>.</p> <p>We demonstrated that <i>"the French Government is not respecting the basic measures which form these minimum requirements"</i>, in accordance with article 11, paragraph 3 and particularly line (d), on the preservation of surface water bodies for the production of drinking water. The city of</p>
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	<p>BESANCON (123,000 inhabitants) receives a large part of its drinking water by abstraction from these bodies, which are situated in an area with high fish mortality due to contamination by cyanobacterial neurotoxins (this also applies to the upper DOUBS, upstream from the town of MONTBELIARD, which also receives its drinking water from this river). This poses clear public health risks, which have been confirmed by the French Agency for Food, Environmental and Occupational Health and Safety (AFSSA).</p> <p>To our great surprise, we learned over the summer of a decision to <b>increase the milk quotas for this basin</b> (1), and more recently, through a report by the Franche-Comté Economic, Social and Environmental Council (CESER), of a scheme to encourage the development of pig farms in this same basin in connection with the Protected Geographical Indication label for regional cured meats (“Saucisses de Morteau” in particular).</p> <p>If confirmed, these two developments would further increase the pressure exerted by substances that contribute to eutrophication. In our eyes this would represent an unacceptable increase in water body pollution, going against the measures laid down in article 11 of the Water Framework Directive (WFD), pursuant to article 4.</p> <p>If such action has indeed been decided upon by the French Government (or proposed by a reasoned opinion from the CESER) on such a sensitive issue, we can only conclude that your departments are able to formally demonstrate that current farming activities have no impact on the pollution of rivers in this basin, in accordance with the obligations of the WFD.</p> <p>We would remind you that some of the documents in the previous Water Development and Management Master Plan (SDAGE) (technical note no. 3 of March 2000) already classified <i>“the river LOUE, as well as the DESSOUBRE, the CUSANCIN and the upper DOUBS, among the most eutrophic in the Rhone-Mediterranean-Corsica Basin, with some of the largest volumes of algal biomass”</i>, and pointed the finger at livestock breeding activities.</p> <p>In our view, the events that have occurred on the rivers in Franche-Comté over the past two years have simply confirmed the continued decline of these rivers, resulting from <b>an intensification of the same pressures</b>.</p> <p>Given the alarming deterioration of the state of the rivers in Franche-Comté, it was vital to explain this impact in a more detailed <i>“impact assessment”</i>, as stipulated in article 5 of the WFD, in accordance with annexes II and III, and as we asked you to do in our petition.</p> <p>Paragraph 1.4 of annex II of the WFD provides that:</p> <p><i>“Member States shall collect <b>and maintain</b> information on the type and magnitude of the significant anthropogenic pressures to which the surface water bodies in each river basin district are liable to be subject, in particular the following.</i></p> <p><i>“<b>Estimation and identification of significant point source pollution, in particular by substances listed in Annex VIII [including “substances which contribute to eutrophication”], from [...] agricultural [...] installations [...]</b>”</i></p> <p>Therefore, given the considerable algal biomasses observed (see the appendix of our petition, pages 11 to 17), we believe that the French Government had a duty to provide additional, objective and impartial information concerning the pressure on this basin from nitrogen and</p>
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	<p>phosphorus.</p> <p>We particularly consider three elements to be essential in estimating the impact of agricultural activities:</p> <p>1. A summary of data on <b>the nitrogen and phosphorus balances</b> of the agricultural holdings <b>in this basin</b>: (supplemented with additional data if necessary to obtain a sufficient and representative number of results).</p> <p>The DOUBS Prefect was asked to provide this information at the meeting with the representatives of our collective on 22 June 2011, and the request was confirmed by our letter of 4 July 2011.</p> <p>This type of balance sheet, based on accounting records and inward and outward movements, is the only way of obtaining a theoretical estimate of nitrogen and phosphorus losses, and therefore of the diffuse pollution generated in the basin, in accordance with the WFD.</p> <p>2. A summary of data on <b>the development of floristic diversity in natural grasslands</b> (in this area of the AOP Comté zone):</p> <p>Scientific studies clearly demonstrate that there is a link between the loss of floristic diversity and overfertilisation. This represents an excellent bioindicator that can be cross-checked with previous theoretical data.</p> <p>The current situation (documented in the progress reports of the Habitats Directive) can easily be compared with studies conducted on the same areas of the basin classified as areas of Community interest. It is therefore quite possible to make an immediate summary of this data.</p> <p>3. <b>Continuous analysis of nitrogen and phosphorus on the rivers</b>: as a form of investigative monitoring – entirely justified under article 8 of the WFD – as requested in our petition.</p> <p>This continuous analysis is the only way of assessing the impact of slurry spreading after heavy winter rain (when the tanks are full) and of large-scale spring manure spreading (which your departments themselves suspect causes pollution – see page 25 of the appendix of our petition).</p> <p>We would therefore be grateful if you could send us this information, or any other information that offers impartial and irrefutable evidence of the balance of nitrogen and phosphorus in the agricultural holdings in this basin and the absence of significant losses in specific climatic situations, <b>as proof of the absence of diffuse pollution contributing to the eutrophication of rivers from current agricultural activities</b>, in accordance with the WFD.</p> <p><b>Should this not be the case, the increase in milk quotas and the incentive measure to encourage the development of pig farms in this basin would represent a serious threat to the water resource and to public health, in clear breach of the obligations of the WFD.</b></p> <p>Thank you for giving this letter your attention and for any subsequent action you may take.</p> <p>Yours sincerely</p> <p>For the LRC Collective</p> <p>(1) The economic climate for milk production is stable and strong in this AOP (protected origin) area (particularly for Comté cheese), and does not justify an increase in quotas.</p>
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	<p>cc: European Commissioner for the Environment Prefect of the Region President of the Franche-Comté Region Chairman of the CESER Press and media</p>
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