

EurEau welcomes the evaluation of the UWWTD

EurEau welcomes the publication of the evaluation of the Urban Waste Water Treatment Directive (UWWTD), published by the European Commission on 13th of December 2019.

The UWWTD is a central pillar of the waste water services in Europe and has successfully created a level playing field for environmental standards and economic investment by setting baseline requirements for urban waste water treatment.

The evaluation report highlights the substantial societal and environmental benefits resulting from the implementation of the UWWTD, thanks to the tremendous investments done by the European Union, Member States and the European water sector to better protect the aquatic environment and the human health.

In general, we support the main conclusions of the evaluation report that the UWWTD has been an effective and efficient legal instrument which has been widely implemented, although we acknowledge that greater compliance is possible. We agree that the simplicity and straight-forward approach of the UWWTD has contributed to its success.

We note that some parts of the evaluation refer to poor modelling results, based on weak and/or missing data (i.e. Combined Sewer Overflows (CSO), Individual and other Appropriate Systems (IAS)).

However, we recognise that **urban run-off** and **CSO** can be a problem in some locations. We underline that solving these issues is complex and that a holistic approach, including urban planning considerations and monitoring of combined sewer overflows, is needed before action is taken.

We underline that the use of **IAS** to comply with UWWTD must be assessed case by case. Notwithstanding this statement, we stress that IAS cover a large range of specific situations (islands, scattered dwellings, isolated houses, stretched settlements along sea or riversides, small villages, etc.) and that there is a need to go deeper in analysing the results on IAS, in particular regarding their environmental performances and in general their efficiency and effectiveness compared to centralised systems.

We regret that evaluation does not analyse the effectiveness of UWWTD regarding discharges of **industrial waste water** into collecting systems and urban waste water treatment plants.

Regarding **coherence**, we underline the discrepancy of approaches on phosphorus and eutrophication between Member States and stress that greater coherence is needed between the UWWTD and other directives, particularly the Water Framework Directive, which takes account of the needs of the receiving environment.



Regarding **relevance**, we agree that the scope of the existing UWWTD was suitable in 1991 but it does not address **realities of climate change** or societal and environmental concerns such as contaminants of emerging concern. Nor does the UWWTD clearly set a path to a fully circular economy, although it does support the re-use of sludge and treated waste water. In the future, we see that the UWWTD could become more relevant by enabling the circular economy. In this sense, we remind that waste water treatment unavoidably produces huge amounts of **sludge** and that extra treatment requirements for waste water should not jeopardise sustainable solutions for sludge disposal.

Contaminants of emerging concern are receiving attention and have been considered in the evaluation. A general approach to remove CECs only under the UWWTD would lead to inefficient measures. Therefore, we suggest that these contaminants should be addressed in a combined approach with the WFD as well as a stringent authorisation process for chemicals.

Current technologies used in waste water treatment plants are not entirely capable of removing micropollutants from waste water. Advanced treatment processes exist but they are expensive, energy intensive and often substance-specific. We strongly believe there is a need to assess more in detail the interactions between “advanced level of treatment”, “energy consumption” and/or “Green House Gas emissions” to avoid counterproductive measures in the context of the EU’s Green Deal. The most sustainable and preferred solution remains to prevent micropollutants – including microplastics – from entering the water cycle in the first place. EurEau asks the European Commission to look for opportunities to implement the Polluter Pays Principle through **Extended Producer Responsibility (EPR)** if control-at-source measures alone are not enough to effectively reduce micropollutants and microplastics emitted from products during their lifecycle.

We finally want to stress that the **cost evaluation** did not consider the renewal of existing assets nor the sludge management that are necessary to consider all the consequences of the current Directive implementation. Maintaining the improvements achieved since 1991 when the UWWTD was introduced will require ongoing resources (sometimes increased costs) just to maintain the current level of waste water treatment.

We have significant **knowledge and expertise** in waste water and rainwater collection and treatment. We look forward to sharing our expertise to support the European Commission in a possible UWWTD revision process.

For EurEau, **water matters.**