

Circular economy – new action plan to increase recycling and reuse of products in the EU

EurEau feedback

EurEau is the European Federation of Water Services. We represent both drinking water and waste water services in Europe. EurEau is committed to acting for the water sector to be part of the circular economy.

According to the first elements available on the New Circular Economy Action Plan (NCEAP), we are very disappointed that water is not mentioned. Even if “water is not a product like any other” as referred in the Water Framework Directive, it would be a failure for the society in its move towards a circular economy not to include water resources and water services in the plan.

Water services are already recovering various resources from their processes, including energy, organic compounds or nutrients (see our Briefing note attached). It is of primary importance that the NCEAP supports and accelerates the uptake of those products by the market (biogas, recovered phosphorus, biosolids, reclaimed water, etc.) in order to encourage and secure long-term investments while ensuring the affordability of water services. Today, many of the material recovery activities are not financially viable as the costs are higher than the prices that can be obtained on the market. In that sense, EurEau welcomes the intention of the European Commission to “foster a well-functioning and integrated internal market for secondary raw materials” and we would support further action and regulation on blending for fertilisers or biogas in order to encourage the use of good quality recovered products. Entering into a circular economy mode to recover material like nutrients need long term investments which will be decided only if they are secured by a clear and supportive legislation.

To enable the circular economy, EurEau sees that significant innovation is required. This may be in technology, business models and in the co-operation between stakeholders. The NCEAP should create space for new and presently unforeseen ways to recover and reuse resources across the value chain. EurEau agrees that the NCEAP “address the enabling conditions supportive of a more circular economy, such as innovation and



investment opportunities for circular business models and enabling technologies” but under the conditions of protecting the environment (incl. climate change mitigation & adaptation) and health of citizens.

Successful material recovery requires the full implementation of control-at-source measures to ensure that waste water and water resources are not accumulating pollutants that would threaten the quality of the recovered products (mainly biosolids and reclaimed water) or would require extra treatment to ensure that the recovered product achieves the quality required by the market. It is crucial, as mentioned in the roadmap, that “minimum requirements [are set] to prevent environmentally harmful products from being placed on the market”. The use-phase of the products needs to be carefully addressed in order to prevent the release of harmful substances, like microplastics or PFAS, in the waste water infrastructure and water resources. Those products are the main obstacle to the reuse of products coming from waste water treatment plants. Strong control at source policy will guarantee the possibility for water services to recover good quality products from their facilities that can be reused safely. Moreover, it will ensure that no extra treatment is used, keeping water services affordable for all. If substances are released during the use-phase of the product and require extra treatment by water services, the Extended Producer Responsibility concept should be applied to substances, not only products, with a view to better implementing the polluter-pays principle and not putting the burden of the extra cost on water consumers.

Finally, the water legislation has been evaluated. In the next steps, it should be clear that the Water Acquis should be looked at with the view to being circular in order to support the water services in their evolution.

About EurEau

EurEau is the voice of Europe’s water sector. We represent drinking water and waste water operators from 29 countries in Europe, from both the private and the public sectors.

Our members are 32 national associations of water services. At EurEau, we bring national water professionals together to agree European water sector positions regarding the management of water quality, resource efficiency and access to water for Europe’s citizens and businesses. The EurEau secretariat is based in Brussels.



With a direct employment of around 476,000 people, the European water sector makes a significant contribution to the European economy.