

# **EurEau's expectations for a revised UWWTD**

Waste water service provider's contribution to the Green Deal

# **Public statement**

**Executive summary** 

European waste water service providers see the revision of the 1991 Urban Waste Water Treatment Directive (UWWTD) as an opportunity to develop an ambitious, innovative, supportive and straight-forward new policy framework enabling operators to meet the Green Deal goals and make waste water collection, treatment and management fit for the decades to come.

New objectives to be delivered must consider the affordability of water services. This includes the long life-cycle of waste water collection and treatment assets and their inherent inflexibility for adaptation or upgrading.

The aim of this paper is to set our general expectations and point at areas to be covered by the impact assessment. Detailed positions or notes on specific topics will be delivered in due course.

Our key messages for EU policy makers include:

- ~ Making **source control** the key principle for management of the whole water cycle, including waste water management.
- Ensuring the sustainable financing of waste water utilities by ensuring full cost recovery.
- ~ Promoting measures towards climate change adaptation and mitigation.
- ~ Exploring the potentials of **circular economy** options.
- ~ Adopting a **holistic approach to micropollutants** starting from **control-at-source** measures and implementing **EPR** for end-of-pipe measures in hot spots.
- Exploring sustainable solutions to address combined sewer overflows, road-run off and issues regarding IAS.

### Context

The UWWTD is the foundation stone on which the European waste water services stand, defining the baseline requirements for sewage collection and treatment systems.

It is an effective and efficient legal instrument which has been widely implemented, although we acknowledge that greater compliance is possible. The simplicity and straight-



forward approach of the UWWTD have both contributed to its success.

Subsequent directives (largely brought in after the UWWTD) build from this foundation to set out additional or more stringent requirements, based on environmental outcomes and/or increased health protection requirements. It is vital that all relevant directives are coherent so as to achieve efficiency of planning, delivery and resources.

The 2019 evaluation of the UWWTD (<u>COM SWD(2019)0700</u>) highlighted the substantial societal and environmental benefits resulting from the implementation of this directive and the tremendous investments done by the European Union, Member States and the European water sector to better protect the aquatic environment and human health.

Amongst its multiple achievements, this Directive has been a powerful tool for organising, structuring and equipping the waste water sector in all Member States by setting compulsory baseline requirements for waste water treatment. These requirements have triggered massive investments in new infrastructure and the ensuing operation and maintenance thereof. Numerous new sustainable jobs have been created as a result.

The UWWTD evaluation identified some areas for improvement and the revision process aims to fill these gaps. In addition, we anticipate that the revision process will help make Europe "fit for the future" by addressing key challenges such as attenuation and mitigation of the impacts of climate change, circular economy, sustainable use and reuse of resources including energy, and protection and enhancement of aquatic biodiversity.

Waste water operators are aware that micropollutants may enter the water cycle via waste water systems; i.e. urban and domestic waste water, industrial waste water, storm water. Since micropollutants are not entirely biodegradable, they can pose a risk to drinking water resources and aquatic ecosystems. This may put additional burdens on drinking water providers who must rely on sufficient clean water resources (surface and groundwater) so that they can fulfil their task to ensure healthy and safe drinking water. EurEau members are committed to protecting the whole water cycle, the wider environment and public health, in sustainable ways.

**EurEau therefore fully supports the Green Deal** and its multiple social and environmental ambitions.

It is of EurEau' opinion that a revised and modernised UWWTD should be a key legal instrument to properly address the European ambitions and the <u>UN Sustainable Development Goals (SDG)</u> for the coming decades. It should also benefit the biodiversity and the protection of aquatic ecosystems, and enhance the protection of water resources.

Our assets have long life cycles<sup>1</sup> and it is vital that the waste water service providers can plan and consistently invest in their systems on that long term basis, including the upkeep of existing assets and introducing new capabilities to enable us to deliver new requirements.

Our assets contribute to various societal and environmental purposes and face multiple

<sup>&</sup>lt;sup>1</sup> At least 30-40 years for civil works and around a century for collection systems.



challenges such as climate change and population growth and mobility.

Meeting society's ambitions will depend on achieving the right balance between the price paid by consumers for water services whilst keeping access to water and waste water services affordable, as these services are essential for life and health.

It is of utmost importance to be sure that achieving new or revised requirements will be possible, both in terms of techniques and in terms of investment capacity. The need for alternative financing is obvious and we support the European Commission's intention to implement Extended Producer Responsibility (EPR) in the field of waste water<sup>2</sup>.

Water is a cross-cutting element to achieve the European ambitions and the UN SDG's.

Integrating Green Deal ambitions will be key for the success of the 2<sup>nd</sup> UWWTD.

This paper details how the European waste water sector can achieve this purpose.

## Fit for the future

The aim of the first UWWTD was to tackle discharges of inadequately treated or untreated urban waste water in the water environment (watercourses, coastal areas, lakes, seas and oceans), which were causing huge pollution - including eutrophication - problems.

Numerous assets have been built and are operated and maintained across Europe to comply with the UWWTD requirements. Where additional requirements have been identified, either through additional Directives, such as the Water Framework Directive, the Bathing Water Directive, or to meet extra requirements such as nutrient reduction under the UWWTD, this has often driven the design and sizing of Waste Water Treatment Plants (WWTP).

The Green Deal and the evaluation of the UWWTD identified the challenges for the future: climate change (mitigation and adaptation) and energy consumption, zero pollution, circular economy, biodiversity, protection of aquatic ecosystems, protection of water resources, contaminants of emerging concern and other pollutants.

These challenges are strong drivers to change approaches, techniques and governance of water in Europe.

Addressing those challenges could be done through a new UWWTD or through different specific policies, as long as new requirements remain clear, realistic, manageable on the field, and consistent.

#### Public health and access to sanitation

The building of large waste water collection systems in urban areas, since the mid- $19^{th}$  century, largely contributed to protecting public health by limiting the diffuse spread of pathogens but, unfortunately, contributed to polluting receiving waterbodies. In the  $20^{th}$  century, the building of waste water treatment plants, boosted by UWWTD, largely

<sup>&</sup>lt;sup>2</sup> Deloitte/EurEau Study on the Feasibility of Applying Extended Producer Responsibility.



reversed this pollution. Maintaining and developing these assets is of utmost importance to protecting human health in Europe.

In 2010, the UN acknowledged the Human Right to Water and Sanitation and also has set SDG6 which aims to give access to clean water and sanitation for all by 2030. We fully support the definition of the human right to sanitation by the UN which encompasses five dimensions: availability, accessibility, affordability, acceptability and safety. EurEau therefore suggests that the revised UWWTD should include legal provisions to enshrine this international right into European law.

#### **Implement source control**

It is our expectation that **source control** will be considered as the prerequisite to enhance the protection of public health, the enhancement of biodiversity and the protection of the aquatic environment. Requiring a source control approach to pollution will allow waste water service providers use less energy by avoiding additional advanced treatments. Source control also leads to safe sewage sludge and treated water fit for the circular economy, and maintains access to water at an affordable cost for citizens.

The European Zero Pollution ambition is key to keeping our water services affordable. We are faced with an ever-increasing number of new chemicals entering the market every day. These adverse chemical compounds are discharged by households, industry and agriculture and can enter the water system and so must be removed before they can enter the environment. It is simply unsustainable and unaffordable for WWTPs to continuously implement more and more treatment processes to remove these. The UWWTD's Impact Assessment should assess mechanisms that will enforce the Control at Source Principle and protect the quality of waste water.

#### Climate change and energy

The first UWWTD is mute on the topic of energy use. In 1991, climate change was not high on the global agenda, greenhouse gas emissions to the atmosphere were a lower priority compared to the water environment, and energy for treatment was readily available. So much has changed since then.

Today, the European water sector faces serious consequences of climate change, which affects both our drinking water and waste water activities. We have more severe droughts and flood events, changes in rainfall patterns, decreases in raw water resource availability for drinking water production and supply, increased flow in combined sewers etc. Our sector has to respond.

EurEau fully supports initiatives that mitigate climate change and to enable adaptation to its consequences in the daily reality of water operators; the water sector has a role to play at national, regional or local basis. It is our expectation that appropriate and proportionate proposals are explored within the UWWTD Impact Assessment which will enable the waste water sector to contribute to climate targets within the Green Deal.



EurEau recognises that a lot can be done to enhance practices on the field; our members also recognise that each WWTP has a different starting point. Today, strategic plans of most of our members integrate those challenges for the future.

As we manage assets that are strongly affected by climate change but not easily adaptable, we would support including solutions based on nature and natural processes, when and where they are effective into the UWWTD. It requires coordination with other stakeholders at urban catchment level. The UWWTD Impact Assessment should explore solutions to promote integrated water management plans, giving water its right place in urban and rural areas, through a multi-stakeholder approach.

To mitigate the greenhouse gas emissions by the construction and operation of assets and aid waste water services contribute to the EU-wide goal of cutting net greenhouse gas emissions by 55% by 2030, we support:

- including compulsory energy & climate audits for existing plants above an appropriate capacity in the UWWTD in order to push operators towards energy and carbon neutrality with the objective to become climate positive on a longer term; from these audits, local measures and action plans should be established encompassing:
  - reducing energy consumption and moving towards energy neutrality (e.g., when and where possible, use of energy efficient treatment systems lowering GHG emissions, application of energy management system such as ISO 50001, use renewable energy, use of energy-generating treatment systems)
  - o quantifying direct GHG emissions
  - o identifying the measures to improve climate performance, according to the investment capacity of the utility and the effluent standards to be reached
- $\sim$  stimulating innovation addressing methane and nitrous oxide (N2O) monitoring and recovery from process emissions through Horizon Europe and other R&D funding instruments
- stimulating innovation through Horizon Europe and other R&D funding instruments addressing individual appropriate systems (IAS) towards more sustainable and easy-to-manage systems, because bad design or upkeep represents a threat for several European waterbodies, especially in rural areas
- improving assessments of combined effects on water, land and air.

#### **Circular economy**

The circular economy is fundamental for Europe to reducing the growing amount of waste and to reducing its dependence on primary resources, particularly non-European resources. Switching from a linear model to a more circular approach will bring both environmental and economic benefits. For this reason, incentives should focus on recovering and recycling local waste. Treated waste water, rich in valuable nutrients and carbon, could be more widely used for soil regeneration and phosphorus recovery. It is our expectation that sludge reuse in agriculture is considered as a mechanism to achieving carbon sequestration,



delivering climate targets.

The first UWWTD has general requirements on the reuse of water and on sludge management, but none on energy or nutrients. The 1986 Sewage Sludge Directive sets additional requirements for the use of sludge on agricultural land. Recent legislation set up guidelines for treated waste water reuse for different purposes, the major one being irrigation in agriculture.

Sewage sludge is a by-product from waste water treatment. It largely consists of biomass, naturally produced by the biological treatment process. This biomass contains valuable products such as phosphorus and nitrogen and can be a source of energy and can contribute to the circular economy. It also contains some impurities that must be strictly kept under thresholds, fixed with risk-based approaches. Tools and techniques exist to guarantee strict compliance with and the safe use of biosolids issued from waste water treatment process.

It is our expectation that the management of sludge and the associated costs are properly considered within the UWWTD Impact Assessment. The existing OECD study on the financial needs for the European water sector<sup>3</sup> does not include the costs of existing sludge management. Additionally, the policy options for the Impact Assessment must explore recovery and reuse possibilities for sludge as part of the circular economy (sludge and compost valorisation to agricultural use, land reclamation and soil remediation, recovery of phosphorous, methane generation, biomethane production for grid injection, etc.) and the investment requirements must be clearly identified.

Some WWTPs will need to adapt or to upgrade to comply with strict quality requirements for the reuse of treated of waste water. The UWWTD impact assessment should evaluate the potential for treated waste water reuse, in full respect of health and environment standards.

EurEau supports the following initiatives and anticipates that the UWWTD Impact Assessment will explore policy option in these areas:

- Promotion of water reuse for irrigation, urban/industrial usages or others, in areas with water scarcity
- Promotion of safe agricultural and land use of the sewage sludge coming from treatment plants
- ~ development of new markets for recovered Nitrogen and Phosphorus
- promotion of innovation in Nitrogen and Phosphorus recovery methods and reuse
- promotion of circular economy-led innovations in all resources from waste water –
  taking account of local markets and interests.

These initiatives can be part of different legislation as long as consistency is ensured. EurEau also calls for quite flexible legal frameworks that allow for innovation and the development of new techniques.

<sup>&</sup>lt;sup>3</sup> OECD Report on Financing Water Supply and Sanitation and Flooding Protection.



#### Biodiversity, protection of aquatic ecosystems and water resources

Protection of aquatic ecosystems and water resources must remain the core ambition of the revised UWWTD and in coherence with the WFD targets, treating water for pollution to enable favourable conditions for the aquatic life. However, to recover biodiversity, the waste water treatment should be combined with other measures (e.g. re-meandering of rivers, continuity of river for fish migration, etc.) that are generally out of the scope of the waste water service providers.

The River Basin Management Plans (RBMP), as defined in the Water Framework Directive, should be the appropriate instrument to integrate these measures. These RBMPs can (and often do) set additional requirements to the performance of Waste Water Treatment Plants, when and where it makes sense.

#### **Contaminants of emerging concern and other pollutants**

To date, the role of WWTP has been to treat domestic waste water and readily integrable industrial waste waters discharged to our collection systems.

Contaminants of emerging concern and other pollutants (including their possible metabolites) are present in urban waste water, from diverse origins (households, industries, agriculture, etc. ...) and through diverse paths. Under certain circumstances, they can harm environment or impede the use of water resources. Those contaminants are tackled by a diversity of approaches among EurEau members, usually linked to the age of their assets.

Therefore EurEau has the following suggestions:

- to reinforce control-at-source for most of the chemicals and products used in households, to protect our assets and workers and to enhance the *quality* of potentially recovered resources. End-of-pipe solutions must remain the last resort.
- the Commission should re-consider the management, control and impact of discharges of **industrial waste water** into collecting systems and urban waste water treatment plants. EurEau advocates that the general conditions under paragraph C of the annex 1 of the current directive that are of utmost importance for the waste water operators, are maintained or, better, more strictly applied.
- it is EurEau's opinion that the revision of the Industrial Emissions Directive should consider extending its scope to small and medium enterprises discharging in sewers as part of control at source of pollutants, and particularly for Persistent Mobile and Toxic (PMT) substances and Substances of Very High Concern (SVHC) that are not removed in the treatment process. For precautionary protection, all substances and their degradation and transformation products should be assessed for their PMT properties.
- in case of end-of-pipe solutions, we suggest a step-by-step approach, primarily at hot spots, and taking into account the age of the infrastructure and other needs for a complete refurbishment or renewal (e.g. due to obsolescence or insufficient capacity). In other words, create room for a **double-strategy** which make sense



on local level.

- in the case of end-of-pipe solutions, the European Commission should assess the interactions between "advanced level of treatment", "energy consumption" and/or "Green House Gas emissions" to avoid counterproductive measures in the context of the carbon neutral emissions targets.
- Finally, if control-at-source measures alone are not enough to effectively reduce micropollutants and microplastics emitted from products during their lifecycle, we suggest to involve the whole value-chain in the environmental protection when putting products on the market through the implementation of the **Extended Producer Responsibility (EPR)**.

# Remaining problems to be fixed

#### Maintaining the current compliance and the existing assets

It is of utmost importance to maintain the improvements achieved since 1991 when the UWWTD was introduced. It requires ongoing resources (and sometimes increased costs) just to maintain the current level of compliance.

Particularly, EurEau encourages the Commission to maintain some of the current requirements in the new UWWTD, particularly strict provisions on industrial waste water discharges to waste water collection systems and WWTPs to protect workers and collective assets.

Many of the sewer networks in big European cities are ageing or becoming less capable of addressing climate change and urbanisation. Huge investments must be made to renew or to refurbish those critical infrastructures to meet our sanitation needs.

According to the OECD study on the financial needs for the European water sector<sup>4</sup>, huge investments are needed to simply maintain the current compliance. This assessment does not consider the renewal of ageing sewer networks or the existing costs of sludge management. However, these two challenges are crucial for the European water sector and will also require huge investments.

The revision of the UWWTD should also consider the '3Ts' methodology developed by the OECD. In order to deliver water services in a sustainable way, all costs must be recovered through tariffs, taxes and/or transfers (3Ts). Indeed, the right balance between these types of funding can collectively make up the basis for sustainable cost recovery, which must reflect the costs structure of the service.

To maintain the current levels of compliance and functionality of existing assets, EurEau suggests that the European Commission:

promotes the use of the '3Ts' methodology developed by the OECD through the UWWTD in order to deliver water services in a sustainable way; all costs must be recovered through tariffs, taxes and/or transfers (3Ts); authorities responsible for

<sup>&</sup>lt;sup>4</sup> OECD Report on Financing Water Supply and Sanitation and Flooding Protection.



setting the waste water services price need to have the tools to find the right balance between the different sources of funding and to make up the basis for sustainable cost recovery.

- proposes specific European funding, grants or loans to support Members States policies for sewer management, as well as plans for the renewal and refurbishment of the existing sewer networks and WWTP, as any improvement of waste water collection and treatment has beneficial effects for the Green Deal's objectives,
- encourages Member States to find ways to achieve source control for rainwater and snow melt to protect existing infrastructure from additional flow ("no-more-in" policies). Source control of the quantity of flow should be seen as equal importance to source control of the quality of waste water.
- stimulates Member States to disconnect pavements and rooves from the sewer system where possible and promote nature-based solutions that help to bring water back into towns and countryside. Infiltration or storing rainwater can contribute to protection against flooding and short-term pollution events, limit heavily embedded carbon infrastructure, enhance biodiversity and protect ecosystems, improve the climate and contribute to restoring groundwater resources. Nature-based solutions for rainwater and urban runoff must be integrated in urban planning.
- encourages Member States to find ways to achieve source control for inappropriate domestic waste entering sewerage networks (such as wet wipes, solid waste, etc.), as they cause damage to the whole sewerage system and increase operation and maintenance costs.

#### Gaps in compliance and differences in implementation

The evaluation of the current UWWTD identified some gaps related to lack of compliance and differences in implementation (agglomerations, IAS, storm water overflows, etc. ...).

To tackle these issues, EurEau suggests:

Addressing the concept of agglomeration

- to clarify the concept of agglomeration and the methodology of delineation
- to avoid considering compliance in a binary approach (compliant/not compliant) but to take into account the real level of achievement
- in the Impact Assessment, to evaluate proportionate and sustainable solutions to the pollution problems presented by smaller agglomerations (less than 2,000 PE) considering local risks and the large diversity of situations in Europe. In addition to this, avoid setting extra reporting burdens to national authorities and utilities.

Addressing the collection systems, Combined Sewer Overflows (CSOs) and urban runoff

to recognise the multiple purposes achieved by the sewer networks across Europe and to fix clear commitments from Member states to tackle **urban run-off** and discharges from **combined sewer overflows (CSOs)** where and when they have a significant impact on the receiving waterbodies <sup>5</sup>

<sup>&</sup>lt;sup>5</sup> Reference to position paper on CSOs and sewer management.



- to encourage and help Member States to enhance the management of sewers networks in order to make these assets fit for the future in a sustainable way<sup>6</sup>
- to boost a coordinated management of the whole sewer systems (waste water treatment plants, sewer networks and inlets), both for dry weather and wet weather, in recognising that combined sewer systems and separate sewer systems have both their own advantages and disadvantages and must remain possible solutions when appropriate<sup>7</sup>
- to include provisions for a better monitoring and control of sewage systems. To be fit for the future, sewer networks must increase their technification: digitalisation and real-time monitoring.

Addressing individual appropriate systems (IAS)

- to include provisions for a better monitoring and control of individual appropriate systems (IAS) inside agglomerations
- to base the monitoring and control of IAS **outside** the agglomerations on the local risks and circumstances, particularly with regards to the protection of drinking water resources. Setting extra reporting burden to national actors by the EU directive should be avoided.
- to boost innovation for appropriate systems for small agglomerations and standalone treatment, to develop safe, efficient, sustainable, and easy-to-manage systems with the opportunity to locally recover and reuse resources from IAS. Nature-based solutions should be promoted.

#### **Nutrients and sensitive areas**

The first UWWTD addressed the challenges of nutrients from waste water entering the water environment with a double objective: protection of sensitive waters from eutrophication caused by waste water discharges and the encouragement of recycling nutrients to agricultural land.

Nutrients (Nitrogen and Phosphorus, N and P) are essential for life. We expect that managing nutrients should remain at the heart of waste water treatment.

The waste water sector is the main control mechanism for managing N and P from humans; although we note that there are other major sources of N and P into the water environment from agriculture.

Huge investments have already been made to achieve the current controls of N and P at WWTPs, although EurEau does acknowledge that there is a compliance gap that needs to be closed. It is our expectation that the costs required to close this compliance gap are included within the UWWTD Impact Assessment. Additionally, it is of common understanding that where trans-boundary issues exist, (such as the Baltic Sea, Danube, south-east North Sea, etc) the existing UWWTD is not sufficient and the emissions of nutrients must be reduced still further to avoid eutrophication problems; we anticipate that

<sup>&</sup>lt;sup>6</sup> Reference to our paper on the management of waste water.

<sup>&</sup>lt;sup>7</sup> Reference to the briefing note on and what is a combined/separate sewer sewer network.



greater efforts are required in these cases and expect the UWWTD Impact Assessment to propose clear, costed policy options.

Looking to the future and building on the successes of the UWWTD, which has resulted in the protection the water environment, EurEau favours a broader approach to managing N and P in the waste water cycle which takes account of the destination of nutrients to land, water and air, as well as taking account of the input loads that are received at the WWTP. EurEau suggests that this broader approach is needed to ensure nutrients are managed in co-ordination with Climate Change targets and the Circular Economy.

Protection of the water environment from excess loads of nutrients may require more stringent approaches, but these should be targeted to where they are needed, due to the energy and chemicals required for nutrient management at the waste water treatment plant.

EurEau members see there is scope to align with the provisions for sensitive areas and less sensitive areas with other directives e.g. WFD, MSFD which put the needs of the receiving waters at the centre. Additionally, the Nitrates Directive may play a role. We suggest that this is explored as part of the upcoming Impact Assessment of the UWWTD.

The recovery and reuse of nutrients is now foreseen within the circular economy, something that we welcome. New partnerships and business models are likely to be required to ensure nutrients can be part of the circular economy and the cost for recovery is not covered by the waste water bill, but is instead based on the Polluter Pays Principle. EurEau stresses that a sustainable market for reclaimed nutrients from waste water must be developed at EU level.

Carbon and nutrients are mainly recovered from waste water by applying biosolids in agriculture (50% sewage sludge production in Europe) or in recultivation or land reclamation (12%). Given this situation, the forthcoming Sewage Sludge Directive should be seen as part of the broader approach to nutrient management, as this approach ensures that nutrients are returned to agricultural land.

Regarding specific P-recovery technologies already applied in some places, the recovery rates vary widely, from around 15-40% for struvite recovered from sludge waters or digested sludge from plants with enhanced biological phosphorus removal, to 80-90% sewage sludge incineration ash from P-removal plants. EurEau sees that new markets for recovered N and P should be encouraged as investment in technologies for recovery of resources are important.

In summary, EurEau suggests that the new UWWTD should address nutrients in the water environment *and* become the instrument through which the recovery and reuse for all nutrients from the human population, whilst ensuring Climate Change targets, are achieved.



# Governance and public information

Water management in general, and waste water management in particular, are an essential dimension of the public management of territories by relevant authorities. This requires a real engagement with citizens to create public trust and educate local populations on the issues at stake. This enables people, water service suppliers and governments to match priorities, financial revenues and their uses. Unfortunately, waste water management remains unknown to the wider public, hindering the overall debate. This situation prevents real issues on which citizens have an influence, such as wet-wipes or chemical and pharmaceuticals discharges, to be tackled properly.

EurEau recognises that there is place for improvement and innovation 8: monitoring, reporting and information are the key to both public confidence and sound development and implementation of environmental policies. EurEau supports all initiatives that will enhance the public understanding and confidence in waste water and storm water operators and the public participation in the protection of water bodies.

To enhance governance and public information, EurEau suggests to the European Commission:

- to review UWWTD compliance monitoring requirements through a sound cost/benefit analysis. Alignment with Environmental Quality Standards (EQS), Water Framework Directive or E-PRTR parameters for all WWTPS will necessarily lead to excessive administrative burdens
- to encourage Members States to develop waste water surveillance to detect early or to follow outbreaks or pandemics or, in a more general way, to globally check the health of population. In that specific case, water surveillance must be supervised by official health authorities that should support related costs and responsibilities
- to encourage IT tools to increase the relevance of public data and transparency
- to avoid data duplication and over-information to the public, who are not necessarily aware of technical considerations. Indicators, possibly set at European level, should have an interest for both the consumers and the companies
- ~ To boost public campaigns to promote the correct use of the sewer networks (flushing only the 3 "P", no other solid waste).
- to be consistent with the Water Reuse Regulation and to lay out provisions to better inform the public.

<sup>&</sup>lt;sup>8</sup> EurEau report on <u>Innovating for a greener future</u>.

<sup>&</sup>lt;sup>9</sup> The 3P's are Pee, Poop and toilet Paper.



## Provisional conclusions

EurEau makes these comments on its expectations as the decisions taken during 2021 will form the new UWWTD and the agenda for waste water for the next decades. It is incumbent upon us to make good choices, which will stand the test of time and ensure citizens across Europe benefit from affordable and sustainable waste water services and that the environment (water, land and air) is protected.

For EurEau, water matters.

#### About EurEau

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



Our members are the national associations of water services in Europe. At EurEau, we bring national water professionals together to agree European water industry 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, from where we coordinate the work of around 200 experts from member organisations and utilities and advocate common positions with EU decision makers.

Our members are fully committed to the continuous supply of clean water and its safe return into the water cycle. We have a role in raising awareness of threats to the water environment. With a direct employment of around 500,000 people, the European water sector makes a significant contribution to the European economy.