

# Complementary comment for the Public Consultation on the revision of the UWWTD

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## 1. Risks associated with discharging urban waste water without appropriate treatment

There are multiple issues with this question that make EurEau's answer being of no opinion.

There are several risks associated to discharging urban waste water without appropriate treatment. However, in Europe thanks to the implementation of the UWWTD, these risks are managed. The definition of appropriate treatment is an issue to answer this question. If there is no treatment at all, there are several risks mentioned that should be ranked high but it does not represent the reality of Europe's situation today. IT is therefore difficult to answer this question without having a better understanding of the objective of this question.

Finally, regarding the contamination of drinking water, the Drinking Water Directive (DWD) protect the health of consumers so even if waste water could contaminate the water resource, the drinking water itself will still be protected by the DWD requirements and treatment will be put in place to comply with these requirements.

## 2. Marginalized and vulnerable groups

We support the ambition of the European Commission to realise the human right to sanitation and the implementation of Sustainable Development Goal 6. We are greatly attached to the definition of the human right to water by the UN according to which this right encompasses five dimensions: availability, accessibility, affordability, acceptability and safety.

We share the ambition to increase access to sanitation in recreational places, cafes and restaurants already in place with positive effects in some Member States. However, any such scheme needs to consider where the responsibility for maintenance, hygiene and cost coverage of these installations will lie (as this will likely be outside the remit of waste water services), and the most appropriate location for these installations. Local authorities are best placed to decide on these aspects.



## 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.



**EurEau**

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