

# Industrial Emission Directive

## Reaction to the Inception Impact Assessment

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EurEau represents both drinking water and waste water service national associations from 29 countries in Europe. Protection of drinking water resources is one of our key concerns and the Industrial Emission Directive should be a key contributor to it. We support a revision of the Industrial Emission Directive in order to better implementing it, improving the application of the control at source principle, avoiding overlaps and participating to enhance the circular economy.

### **Reinforce the protection of water resources**

IED and the related BATs should include requirements for the protection of water resources in order to avoid deterioration of the quality of water bodies and the need for increased treatment by drinking water suppliers according the precautionary principle, the control at source principle and the polluter pays principle as stipulated in article 191.2 of the TFEU.

Despite regulatory action under the IED, pollutants from industrial sources continue to be released directly or indirectly to the aquatic environment where they pose a threat to the quality of water resources. In that sense, IED and BAT/BREF documents should be a strong instrument to apply the control at source principle to industry by regulating all emissions of hazardous substances and in particular the one that cannot be removed by municipal WWTP. Additionally, it should require a set of measures for industrial waste water conveyed to the sewers of a water utility in order to

prevent environmental hazards caused by pollutant releases from the water utility and protect downstream drinking water resources to avoid water suppliers to invest in increasingly sophisticated, expensive and energy-intensive treatment processes to remove pollutants (respect Art. 7.3 of the Water Framework Directive);

ensure the safe, environmentally acceptable use and final treatment of sludge;

protect the sewer network and the health of the employees of WWTP;

prevent harm to the operation of the treatment processes for waste water and sludge;

prevent sewer networks, treatment plants and their related equipment from getting damaged.

### **Implement the polluter-pays principle**

The industrial activities covered by the IED and discharging their effluent into municipal sewers should be fully re-charged for the load of pollution brought to the WWTP in order to respect the polluter pays principle.



### **Guarantee access to relevant information**

Information on chemical substances released in the environment should be better regulated. Currently, the chemical plant or the owner of the industrial WWTP is under no obligation to report on substances (of emerging concern) emitted to surface waters beyond those substances reported under by the E-PRTR. Complete registers with all chemical substances and by-products that are produced or used in the chemical plant should be accessible to all water users and regulators in a specific river basin area, in line with the Aarhus Convention. It would enable water suppliers to better predict the effects on drinking water resources. Furthermore, it enables targeted measures to remove those substances at the chemical plant before they enter the aquatic environment.

### **Avoiding regulatory overlaps (coherence & future relevance)**

Coherence between the IED and activities covered by the UWWTD (treatment of waste water or sewage sludge and reporting especially) should be improved. More coherence is also needed between Directive on Environmental Quality Standards (Directive 2008/105/EC) and implementation of IED and sectoral BAT/BREF-documents.

IED must be aligned with the Circular Economy such that resources can be recovered and reused without the IED creating regulatory barriers. The IED must be aligned with future targets for carbon emissions under the Green Deal and create effective mechanisms to reduce industrial emissions of the climate change gases.



### **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.