



# EurEau feedback to the roadmap on the evaluation of the Urban Waste Water Treatment Directive

EurEau welcomes the initiative of the European Commission to evaluate the Urban Waste Water Treatment Directive (UWWTD) after 26 years of implementation.

EurEau is the European association of water operators and represents nearly all the European waste water operators.

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.

UWWTD was, and still is, a powerful driver:

- ~ to enhance the **protection of European waterbodies**
- ~ to implement the polluter pays principle and to create a high value **market** of works and services by building and by operating numerous assets for collection and treatment of urban waste water across the EU
- ~ to enable a better structure of the water sector in the EU, irrespective of the choice of **governance** models at MS level
- ~ to increase scientific **knowledge** and technical **innovation**
- ~ to create numerous stable **jobs** requiring different levels of competence and skills.

We agree that time is now to evaluate the costs and benefits of UWWTD implementation. UWWTD is one of the most expensive European directives as its implementation required heavy and long investments that are in some places still on-going. We consider that it would be very useful to investigate the **reasons for non-compliance** and to carefully assess what is possible to achieve in the future, in the framework of the sustainable development goals.

We emphasize that the main issue for waste water operators across Europe is to manage, refit or renew the **ageing assets** that require huge and urgent investments.

We stress the need for **better policy coordination** by updating coherence between UWWTD and the European water laws, including chemicals



regulations. This will allow that **new challenges** such as emerging pollutants, management of by-products in a more circular economy, adaptation to climate change, evolution towards less energy consuming assets to be sustainably addressed.

We consider that water industry has a role to play in the **circular economy**. Evaluation of UWWTD directive provides the opportunity to clarify and align the approach for sewage sludge, possibly through adaptation of other regulations.

We consider that financing new developments cannot only rely on increasing the water bill. **Affordability** of services, to keep the water environment clean and to safeguard water resources for human health, requires that the **polluter pays principle** be clarified in many cases and the **extended producer responsibility** be incorporated.

The evaluation must consider compliance with **industrial waste water** requirements. *Industry should develop responsible solutions to reduce harmful impact of their products on the environment and waste water assets.* We consider that **control at source** is the most sustainable way to avoid the release of many pollutants, with end-of-pipe treatment remaining the **last** option.

We consider that for **resilient cities** an early integration of the water cycle in city planning and real estate projects has to be addressed to achieve better climate adaptation by reducing urban runoff, discharges from all types of sewer networks and urban **flooding** or **drought** events.

Because of the universal nature of water we consider that **EU-added value** is relevant for management of water and waste water even if implementation may be achieved by locally different enforcement solutions depending on natural or human conditions.

We welcome the evaluation as an opportunity for **innovation**, to enable improvements in performance and efficiency of the waste water sector and creating a more sustainable & resilient approach in the future.

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 the UWWTD evaluation process.

For EurEau, **water matters**.

