



EurEau feedback to the IIA on the revision of the Urban Waste Water Treatment Directive

EurEau is the European federation of water services and represents nearly all the waste water operators in Europe. Our members deliver waste water services to citizens across Europe. A revised UWWTD will set the context for waste water services for the next generation. Therefore we highlight key points that the impact assessment (IA) must address.

We support the inclusion of the **Green Deal and the Circular Economy** within the IA as our members are already working on the sustainability of waste water services, from collection to treatment, and the recovery of valuable resources from waste water.

The IA aims to assess the cost/benefit of diverse policy options by comparing them with **a basic scenario**. We urge the Commission to consider in this basic scenario the current investment needs to reach the full compliance with the existing UWWTD, to maintain, adapt and/or refurbish the existing infrastructure (particularly sewer systems) and to manage the infrastructure against the effects of climate change and movement and growth of the population. Otherwise the IA will underestimate the full cost of the basic scenario and mislead the comparison with the new policy options.

We highlight the need for **policy coordination** with other directives, especially to give clarity and justification on the scope of a revised UWWTD. Specifically the IA should investigate the interaction with emerging policies from the Green Deal and with other legislation, for example WFD, water reuse regulation, SSD, BWD, REACH and IED. The IA must consider policy coordination to ensure that waste water services of the future are sustainable, affordable, can be efficiently delivered, trusted and supported by citizens.

We insist that the IA investigates policy coordination with the WFD to specifically ensure that both the Environment is protected in a sustainable way and that WWTP can operate and increase capacity according to population growth.

We strongly suggest the IA clearly defines individual policy options and then looks at them **in combination to assess their overall effect**. For example, the policy to reduce energy, recover resources and reach climate neutrality should be seen in combination with the ambition to enhance treatment of pollutants.

We support the inception IA approach to take a holistic view on **emerging pollutants** but control at source and preventive measures must come first, with the application of extended producer responsibility as a means to finance enhanced treatment.



We suggest that the IA explores future policy options for **small agglomerations** lower than 2000 p.e. with respect to nutrient management and appropriate governance arrangements. This should be done in coordination with policy options for **IAS**.

The IA must recognise that **collecting systems** achieve multiple objectives (such as protecting properties from sewer flooding) and not only pollution objectives.

The IA must address discharges of **industrial wastewater** into collecting systems and urban WWTPs. Effective control of industrial discharges is essential to manage the quality of WWTP effluents and by-products.

We support that the IA explores the role of **innovation** to enhance treatment and recover resources, in conjunction with policy options responding to challenges where technical solutions have shown value for the environment and are practicable for waste water services.

Finally, we also want to highlight that the objectives set in the Green Deal have to be reached in 2035 and in 2050. These **deadlines** are very ambitious with regards to the challenges presented in the inception IA. The policy options and their implementation will have to be adapted to this calendar, the investment capacity of the sector and the lifetime of the existing assets.

For EurEau, **water matters**.

