

# Public Consultation on the Evaluation of the Urban Waste Water Treatment Directive (91/271/EEC)

Fields marked with \* are mandatory.

## Introduction

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### Introduction to waste water in general

In Europe, we use on average 200 litres of water per person per day. Waste water is produced as sewage from households, tourism, industries and workplaces. Before waste water is discharged into the environment, it is usually collected in sewers and then treated in waste water treatment plants or equivalents to take out harmful substances, as required by the existing EU law. Waste water can contain different types of substances and pollutants, which can cause problems in the environment (such as rivers to which the waste water is discharged and other interlinked water bodies). These pollutants can also affect human health as people come into contact with the water, for instance, through bathing.

In 1991, the European Union adopted the Urban Waste Water Treatment Directive (91/271/EEC) to help improve the management of waste water from households and specific industries (see Annex III of the Directive) across Europe. This law sets out legal obligations to ensure waste water is collected and appropriately treated before being discharged.

It has been 27 years since the Urban Waste Water Treatment Directive was adopted and the European Commission has decided to conduct an evaluation. Essentially the evaluation aims to see whether the law is doing what it is meant to do, whether its objectives are still relevant today, and whether the costs arising from the requirements of the law are justified.

Since 1991, there has been new EU law on water. For example, in 2000 the Water Framework Directive was adopted, and the law on bathing waters and drinking water has also been revised. There have also been technical advances on treatment techniques for waste water, and emerging pollutants have been identified that might require removal. Also, since 1991 the EU has been enlarged from 12 to 28 countries, increasing the total amount of waste water to be collected and treated, and presenting different experiences and challenges in the new Member States (e.g. in Scandinavia, Central and Eastern Europe and the Mediterranean islands).

For more information about waste water management in Europe, please check out these websites:

The European Commission's website about the Urban Waste Water Treatment Directive: [http://ec.europa.eu/environment/water/water-urbanwaste/index\\_en.html](http://ec.europa.eu/environment/water/water-urbanwaste/index_en.html)

The European Environment Agency's interactive map where you can check out the situation in your country and individual waste water treatment plants: <https://www.eea.europa.eu/themes/water/water-pollution/uwwtd/interactive-maps/urban-waste-water-treatment-maps>

Links to various national sources of information: <https://www.eea.europa.eu/themes/water/water-pollution/uwwtd/links-to-national-water-waste/links-to-national-water-waste>

## Introduction to this consultation

The purpose of this consultation is to understand the views of the public on waste water and how it is managed. The consultation is sub-divided into three parts.

**Part I:** The first part asks for some information about you (such as which country you come from).

**Part II:** The second part is addressed to the general public. You do not need any specialist knowledge on the law or on waste water treatment to reply to this.

**Part III:** The third part is addressed to experts and contains more detailed and technical questions.

All of the responses to this consultation will be fully assessed and the overall results will be included in the analysis supporting the evaluation of the Urban Waste Water Treatment Directive. We will also produce a stand-alone summary of the results of the consultation (to be published [here](#)).

If you have any questions, please contact either the European Commission via [ENV-URBAN-WASTE-WATER@ec.europa.eu](mailto:ENV-URBAN-WASTE-WATER@ec.europa.eu) or the project team supporting the Commission's work ([UWWTDEVAL@woodplc.com](mailto:UWWTDEVAL@woodplc.com)).

Your voice matters and we are grateful to you for taking the time to complete this consultation.

## Questionnaire

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### Part I - Introductory questions

**\* I am replying to this questionnaire as a (representative of, where not a private citizen):**

- Private citizen
- Waste Water Treatment Plant operator or association (public)
- Waste Water Treatment Plant operator or association (private)
- Other company or business
- Other private (including trade) association
- Other public association
- Non-governmental organisation (NGO)
- Public authority (municipal level)
- Public authority (regional level)
- Public authority (national level)
- Public Authority (agency)

- European institution / European agency
- Academic/ research institute
- Other (specify below)

Please specify:

*1500 character(s) maximum*

EurEau is the European Federation of National Association of Water Services. We represent Waste Water Treatment Plant operator from both public and private management.

**If you represent an organisation, at which level do you operate?**

- International (non-EU and/or EU countries)
- EU
- National
- Regional
- Local
- Other

**In which country do you live most of the year, or is your organisation based?**

Please indicate "EU" if representing organisations from across the EU or operating in several EU countries).

EU (e.g. operate at EU level)

\*

**Please provide your full name or the name of the organisation that you are representing:**

*1500 character(s) maximum*

EurEau, the European Federation of National Association of Water Services

**If you represent an organisation, is it registered in the EU Transparency Register?**

- Yes
- No
- I do not know

**\* If yes, what is the EU Transparency Register ID number?**

39299129772-62

In the interests of transparency, organisations, networks, platforms or self-employed individuals engaged in activities aimed at influencing the EU decision making process have been invited to provide the public with relevant information about themselves, by registering in Transparency Register and subscribing to its Code of Conduct.

Please note: If the organisation is not registered, the submission will be published separately from the registered organisations. During the analysis of replies to a consultation, contributions from respondents who choose not to register will be treated as individual contributions

(unless the contributors are recognised as representative stakeholders through Treaty provisions, European Social Dialogue, Art. 154-155 TFEU).

If your organisation is not registered, you have the opportunity to register now [here](#).

**\* Please provide an email for us to follow-up to your response, if necessary:**

bertrand.vallet@eureau.org

**\* Please indicate below if you want your contribution to remain anonymous:**

Please find on the homepage of this survey the specific privacy statement regarding how your personal data is protected. Please note that regardless of the option chosen your answers may be subject to a request for public access to documents under Regulation (EC) No 1049 /2001. In such cases, the request will be assessed against the conditions set out in the Regulation and in accordance with applicable data protection rules.

**Respondents should not include personal data in documents submitted in the context of the consultation if they opt for anonymous publication.**

- I give permission for my contribution to be published with my personal information: I consent the publication of all information in my contribution in whole or in part including my name or my organisation's name, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication.
- My contribution can be published provided that I remain anonymous: I consent to the publication of any information in my contribution in whole or in part (which may include quotes or opinions I express) provided that it is done anonymously. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication.

## Part II – General public questionnaire

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All of the questions in this part of the consultation are multiple-choice questions. However, there is also the opportunity to make more in-depth comments or provide additional information in response to the last question if you wish.

### Your understanding of water, waste water and your relationship with it

We interact with water every day. We drink water, use water in our daily life and we produce waste water. Many of us also enjoy swimming in lakes, rivers or the sea. To enjoy a clean environment and clean waters, it is important that our waste waters are treated before being discharged. These first questions seek to get an appreciation of how you understand your relationship with water, to understand your knowledge on how waste water in your area is being collected and treated, and if you think this is important.

**Which of the following do you think are the main sources of pollution to rivers, lakes, and the sea, please provide us a ranking:**

	1 - Main source	2- Not so much a source	3- Not a source	I do not know
Households (e.g. waste water from kitchens, bathrooms, etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Agriculture (e.g. run-off from fields leading to pesticides, nutrients and manure entering the sewage system)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Industrial sources (e.g. waste water discharges from manufacturing activities etc.)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Urban sources (e.g. waste from the streets such as microplastics from the abrasion of tyres)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**If you think there are other important sources, that are not mentioned above, please comment here:**

*1500 character(s) maximum*

**Do you know how waste water is treated (cleaned) in your area?**

- Yes
- I have some idea
- No
- I am not interested in this.

**Do you know who treats your waste water?**

- A public company
- A private/public company
- A private company
- I have my own individual treatment plant.
- I am not interested in this.
- I do not know

**Do you think that waste water is adequately treated in your area?**

- Yes
- To some extent
- No
- I do not know
- I am not interested in this.

**Which of the following are according to you the benefits of treating waste water before discharging it into the environment?**

	To a large extent	To some extent	To no extent	I do not know
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Protection of the environment including wildlife	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Clean rivers	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Clean seas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Clean bathing areas useable for recreation purposes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Clean drinking water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Health benefits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduction of odour	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Removal of pollutants	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**Take a moment to compare the benefits of clean rivers, lakes, and the sea you have experienced (if any) to the costs that you pay for water services that partially cover the treatment of wastewater.**

**Do you think that...:**

- the costs outweigh the benefits.
- the costs and benefits are about the same.
- the benefits outweigh the costs.
- I do not know

**Are you familiar with the EU Urban Waste Water Treatment Directive?**

- I am not familiar with the Directive
- I am slightly familiar with the Directive
- I am very familiar with the Directive

**Do you think that EU law on waste water has contributed to the rivers and lakes in your area being less polluted than they were in the past?**

- Yes
- To some extent
- The quality has stayed the same.
- No
- I do not know

## Collection of waste water

Many households in Europe are connected to sewers that collect waste water, which is then piped to treatment works. Some households, however, have their own systems, such as septic tanks. The questions in this section ask about your connection with the sewage system. Please only answer the questions which apply to you.

**Is your household connected to the public waste water collecting system?**

- Yes
- No

- I do not know
- Other

## Treatment requirements, information to the public and perception of costs

EU law requires different types of waste water treatment. This depends on the size of the population being served by the treatment works, and whether or not the treated waters are discharged into waters that are particularly sensitive to pollution. Treatment includes removal of solid waste items, organic matter (e.g. faeces) and nutrients such as nitrogen and phosphorus, which can negatively affect rivers, lakes and coastal waters.

To have this treatment, water collection and treatment systems have to be built, maintained and operated, and therefore also to be paid for, including by the users (even if they do not pay the total cost). There are different ways this can be done. For example, households may be charged through water bills or the costs may be included in local taxation or charges.

Information to the public can help create an understanding about the costs of waste water collection, treatment and its management as well as its impact on people and the environment.

The following questions ask for your views about the adequacy of current treatment practices, your current level of information as well as your perception of the costs related to them.

### Are you concerned that one or several of the following substances can be found in treated waste water?

	1- Not at all concerned	2	3	4	5- Very strongly concerned	I do not know
Pharmaceuticals (e.g. those excreted when you take medicines)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other household waste (e.g. oil, paint, other household chemicals)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Micro plastics (e.g. fibres released from clothes during washing or particles from worn tyres)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Endocrine disruptors (i.e. substances that contain hormones that affect the development and function of animals and humans)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pesticides (e.g. from using herbicides on your property)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pollutants from industrial installations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**If you are concerned about one of the above, to what extent would you accept that the additional treatment that might be required to remove these substances may lead to a price increase in your water services bill?**

- Absolutely acceptable
- Acceptable if the increase in costs is limited.
- The initial polluter (e.g. industry) should pay for the removal of the pollution.
- Not acceptable
- I do not know

**If you wish to comment on the previous question, please do so here:**

*1500 character(s) maximum*

**Do you think that you have sufficient information on the following topics?**

	Yes, I have sufficient information	No, but I am interested in this kind of information	No, and I am not interested in this kind of information
Information on how my waste water is treated	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on where my waste water is treated	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on who is treating my waste water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on where my waste water is discharged	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on the costs for treating my waste water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on my costs in comparison to other households in the area	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on how the costs are calculated	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on investments in the treatment and sewer system in my area	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on how waste water discharges affect rivers, lakes, seas or the general environment in my area	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

## The value of having EU law on waste water

The EU Directive is one possible way to address waste water collection and treatment. Another option would be for each Member State to adopt their own law on this issue without an EU legislative framework.



When evaluating EU law it is important to check that it adds value to what could be achieved by Member States acting on their own. The following questions explore your views on this.

**Do you believe that the improvements since 1991 in waste water collection and treatment, including the construction of related infrastructure, would have happened in your country, region or city without the EU law?**

- Yes, they were already in place before the EU legislation.
- Yes, they would have happened anyway.
- Yes, they would have happened anyway, but more slowly.
- Yes, they would have happened anyway but to a lesser extent.
- No, they would not have happened without EU legislation.
- I do not know

**Do you think there is still a need for EU law to regulate the collection and treatment of waste water with the objective of protecting the environment?**

- Yes
- Only for some aspects (i.e. protection of transboundary waters, achieving high standards across EU for the protection of the environment, sharing practices)
- No
- I do not know

## Conclusion

Thank you for spending time completing this questionnaire. Your answers are valuable in helping to understand people's views on this issue.

If you wish to expand on any of your answers or to add comments or information on other aspects relevant to the collection and treatment of waste water in Europe, please do so in the box below.

*1500 character(s) maximum*

**If you would like to submit your replies to the questionnaire at this stage, please go to the end of the expert part and click on the "submit" button.** You do not need to fill in the questions in that part.

## Part III – Expert stakeholder questionnaire

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### Introduction to the expert questionnaire

The specific requirements of the Directive are:

- To collect and treat waste water from all agglomerations of more than 2,000 population equivalents (p.e.).

- To apply secondary treatment, addressed to remove organic pollution from all discharges from agglomerations of more than 2,000 p.e., or of more than 10,000 p.e. if they discharge in coastal waters or estuaries.
- To apply more advanced treatment (removal of nutrients or other types such as disinfection) for agglomerations of more than 10,000 p.e. in designated sensitive areas (e.g. where waters are at risk of receiving too high nutrient loads, bathing waters etc.).
- If it is economically infeasible or the establishment of a collecting system does not result in an environmental benefit, individual systems or other appropriate systems which reach a similar level of environmental protection, may be used.
- A requirement for authorisation of all discharges of urban wastewater (such as a permit or license), of discharges from the food-processing industry, and of industrial discharges into urban wastewater collecting systems.
- Storm water overflows: Member States can decide on measures to limit pollution from storm water overflows. These measures can be based on dilution rates or capacity in relation to dry weather flow, or can be to specify a certain number of acceptable overflows per year.
- Re-use of sewage sludge and treated waste water re-use is allowed whenever appropriate.

All significant EU law and policy is subject to evaluation. Evaluation is an analysis of whether the policy is still fit for purpose and still meets today's challenges. The evaluation is structured around five themes:

- **Effectiveness:** Has the Directive achieved what it set out to do? If not, why not?
- **Efficiency:** What are the costs and benefits of implementing the Directive? Are the costs justified? Are the particular requirements cost-effective compared to alternatives?
- **Coherence:** Are the requirements of the Directive consistent with those of other policies? Does any inconsistency cause practical problems?
- **Relevance:** Are the objectives and the way the Directive seeks to deliver these still correct today? Has technology moved on? Are there better solutions available?
- **EU Added Value:** What would have been the outcome without having an EU Directive? What is the justification for having EU law on this issue?

## Effectiveness

The analysis of the Directive's effectiveness focuses on whether the main and specific objectives of the law have been reached, in this case, the protection of the environment from urban waste water discharges.

**To what extent has the implementation of the UWWTD been effective in achieving the following objectives?**

	Very effective	Somewhat effective	Neither effective nor ineffective	Somewhat ineffective	Very ineffective	I do not know
Protecting the environment from adverse effects of urban waste water discharges	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Protecting human health from adverse effects of urban waste water discharges	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Protecting the environment from adverse effects of waste water discharges from certain industrial sectors	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Protecting human health from adverse effects of waste water discharges from certain industrial sectors	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Promoting continuous improvement of environmental performance of techniques used for urban waste water treatment	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Collecting waste waters	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reducing biological oxygen demand (BOD5)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reducing chemical oxygen demand (COD)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Removal of Phosphorus	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Removal of Nitrogen	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring designation of sensitive areas	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring a proper application of IAS (Individual or other Appropriate System)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring a proper use of CSO (Combined Sewer Overflow)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Achieving an adequate reporting of the implementation programmes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Achieving an adequate management of the implementation programmes	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**To the best of your knowledge, are all the requirements of the Directive effectively implemented and enforced?**

- Yes
- No
- I do not know

**As far as you are aware, does the implementation of the UWWTD vary across Member States or regions?**

(e.g. Does it vary within your country or between neighbouring countries/other countries that you know of?)

- Yes
- No
- I do not know

If yes, please describe which provisions of the Directive are not implemented consistently (e.g. monitoring and sampling) and some geographical examples (Member State or regional level) illustrating such inconsistencies.

(Please note that the Directive allows for some differences in implementation (e.g. on whether to tackle nutrients at a whole country level or within designated Sensitive Areas or depending on the agglomeration's size). In addition, some EU countries are still under transitional periods for implementation.)

*1500 character(s) maximum*

Variation is a result of the different transposition, the local administrative arrangements and the technical level from where Member States started. Differences exist in the definition/interpretation of agglomerations, the dimensioning of collecting and treatment infrastructure, as well as in the application of concentration consents and/or percentage reduction consents.

**In general, do you think that the Directive's requirements are:**

- Too ambitious
- Very ambitious
- Ambitious
- Somewhat ambitious
- Not ambitious enough
- I do not know

**In the following we would like to ask you to rate the barriers to full implementation of the Directive. Please firstly indicate the level at which you would like to rate the barriers:**

- EU level
- Member State level
- Local level

**Please rate the following (potential) barriers at *EU level* to the full implementation of the Directive?**

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	Low barrier	Moderate barrier	High barrier	I do not know
Lack of governance	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of political will	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Lack of funding	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Inadequate dimensioning of treatment plants	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inadequate treatment level applied	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Obsolescence of infrastructure: collection network	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Obsolescence of infrastructure: treatment plants	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Difference in interpretation of key provisions among Member States/regions/local areas	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Poor application of measures for storm water overflows	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Wrong use of Individual or other Appropriate Systems (IAS)	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you would like to comment on one of the above or add something, please do so here:

*1500 character(s) maximum*

Other: evolution of the population through different categories may need important investments for low benefit in term of Environmental improvement

**Which of the following elements contributed to the achievement of the objectives of the Directive?**

**Please specify to what extent they had an impact on achieving the objectives.**

	Adverse impact	No impact	Some impact	High impact	I do not know
Clarity with regards to the scope of the Directive (e.g. population thresholds, type of pollutants)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Clarity with regards to the overall requirements of the Directive to collect waste water	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Clarity with regards to the overall requirements of the Directive to treat waste water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Clarity with regards to the overall reporting requirements by Member States to the European Commission	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Clarity with regards to specific pollutants controlled by the Directive and related thresholds (BOD5, COD, TSS, Phosphorus and Nitrogen)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Clarity with regards to the provision related to individual or other appropriate systems	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Clarity with regards to the provisions related to storm water overflows	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Clarity with regards to provisions related to small agglomerations	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Clarity with regards to the provisions related to sensitive areas (e.g. on designation)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Clarity with regards to the provisions related to providing information to the public	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The European Commission's approach to infringements by Member States	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The European Union's support to implement the directive (e.g. funding)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other elements	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**If you would like to comment on one of the above, please do so here:**

*1500 character(s) maximum*

In general, before having the guidelines to define agglomeration available, it was difficult for the directive to have a full impact. There is still a lack of impact regarding small agglomeration and the question of CSO is complex and difficult to regulate adequately according to the different functions of the sewer. The current wording of the Directive leaves room for action at MS level. A one-size-fits-all solution would require a tremendous investment. Good environmental outcome can be achieved by different enforcement solutions. Tackling the CSO issue should be decided nationally since local conditions vary a lot.

**Do you have any information on storm water overflows?**

- Yes
- No

**What is the frequency of overflows in your area?**

- At every storm (monthly or more frequent)
- At every major storm (less than 5 times/ year)
- Exceptional (once or twice a year)
- I do not have this information

**Do you have a time and/or volume cut off to distinguish between individual spill events and, if so, what are the criteria (e.g. if a spill continues over a longer period is this counted only as one spill)?**

- Yes, there is both (time and volume cut off)
- Yes, there is a time cut-off
- Yes, there is a volume cut-off
- No
- I do not have this information

**What is the share of combined versus separate sewer networks in your region/municipality /country?**

Please indicate (xx% combined sewer and xx% separate sewer) as well as the name of your region /municipality/country:

*1500 character(s) maximum*

Difficult to know as it varies a lot from one city to another. Some country have only separate sewers and others have high percentage of combined sewers so the coverage can be between more than 90% of combined sewers and 0% for certain countries.

**What is the typical design dilution rate before overflow?**

Please indicate:

*1500 character(s) maximum*

The dilution rate is defined by the typical flow threshold at which overflow begins, and is the ratio of sewer conveyance to wastewater flow. For instance, in a combined sewer with a wastewater discharge of 100 l/s [liters per second] during dry weather, and a maximum flow above which overflow occurs during storms (i.e., a conveyance) of 500 l/s, the dilution rate is 5.

Range: from 2 to 12. It depends on the network, the historical data and the sensitivity of the receiving water body. Some networks have been designed with the purpose of having overflows above a certain threshold, others have not been really properly designed if they are old. Then it is difficult to know which criteria have been used. However as Federation, there is a whole range of answers possible.

**Do you have any data on overflow frequencies and volumes?**

- Yes
- No

**If you have any data or information, please indicate where this information is accessible (i.e. link to website, name of document/study)**

*1500 character(s) maximum*

**Alternatively, please upload your information here:**

The maximum file size is 1 MB



## What are the unintended (positive or negative) consequences of the Directive?

### Positive unintended consequences

	have /has occurred	have/has occurred to a certain extent	have /has not occurred	are/is not an unintended consequences	I do not know
Lower costs than expected	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Incentivised research and development for waste water treatment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increase in skills of workers dealing with waste water management	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strong development of the water sector due to the directive	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other positive unintended consequences	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify:

1500 character(s) maximum

Generation of new jobs for outside of the water sector; Awareness raised with consumers (households, industry, agriculture) on wastewater issue and associated costs to remediate.

### Negative unintended consequences

	have /has occurred	have/has occurred to a certain extent	have /has not occurred	are/is not an unintended consequences	I do not know
Higher costs than expected	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Inappropriate investment (e.g. investments in too small or too large treatment plants)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Increased amounts of pollutants in sludge	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Decreased nutrient content of sludge	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

Discouragement of continuous technical improvements	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other negative unintended consequences	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify:

*1500 character(s) maximum*

- Huge generation of sludge volume without proper indications on sludge management
- High consumption of energy and chemicals
- The EU-commission's interpretation on natural retention of nitrogen in e.g. lakes has been negative for the respect of the UWWTD and the EU (high costs without environmental gains).
- Rise of the price of water and affordability of the services.
- Inappropriate solid waste disposal through the sewer by the public

## Efficiency

Are you aware of any annual average estimates for the following cost categories of complying with the Directive? These might be costs at water treatment plant level, regional level or country level. Note that we understand some activities are more relevant to operators and some to regulators, so please respond where you can.

**Costs in relation to the Urban Waste Water Treatment Directive:**

	Costs (please indicate the currency)	Source of information (if available)	Level of the information (WWTP, municipal, regional, national)
Capital expenditure (e.g. building infrastructure for collection and treatment plants)			
Maintenance cost of infrastructure (e.g. renewal of infrastructures)			
Operating costs (e.g. personnel)			
Administrative costs (e.g. keeping records, reporting to competent authorities)			
Costs of monitoring, reporting performance / compliance to Member State authorities			
Costs of enforcing the requirements of the law (e.g. inspection, reporting to the European Commission)			
Costs for providing information to the public			

**If you have other information on costs or general comments, please do not hesitate to contact us via ENV-URBAN-WASTE-WATER@ec.europa.eu or fill in the box:**

*1500 character(s) maximum*

EurEau does not have the numbers available as they are asked but MS should be able to provide them.

Please rate the following scale of (indirect) benefits from the implementation of the Directive:

	0 – adverse impact	1 – no benefit	2 – Little benefit	3 – Some benefit	4 – important benefit	5 – very important benefit	I do not know
Overall reduction of emissions of organic pollution to the groundwater	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Overall reduction of emissions of organic pollution to surface water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Reduction of nutrients causing eutrophication	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduced emissions of industrial pollution to water bodies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduction of microbiological pollution	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reduction of public health problems (e.g. incidents of illness)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Improvements in water status (good chemical status)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improvements in water status (good ecological status)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improvements in water status (good ecological status)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improvements in biodiversity in receiving waters	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improved knowledge and subsequent remedial actions from monitoring and reporting	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improved public information on the national approach to urban waste water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improvement of the recreational values of recipient waters (e.g. fishing opportunities, clean bathing waters)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Contributing to functioning ecosystem services (e.g. provisioning of clean water, supporting nutrient cycles, recreational benefits)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

Improved availability and quality of treated water for water reuse purposes	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improved availability of nutrients through re-cycling of sludge	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improved public sanitation and quality of life	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Improved economic growth and creation of jobs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other benefits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Please specify:

1500 character(s) maximum

We know there are multiple benefits to collect and treat waste water on the receiving waters but the absence of baseline and objective monitoring cannot allow for a precise quantification of the benefits.

Other benefits: standardised approach to waste water management improving the quality of the measures, clear expectations to collect and treat waste water before it goes back to the Environment, cross-border benefits.

**To what extent do you agree with the following statements on the justification of costs and benefits of this Directive requiring, amongst others, collection systems and adequate treatment?**

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	I do not know
The costs involved in relation to the Directive are justified given the benefits that have already been achieved	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The costs involved in relation to the Directive are justified given the benefits that will be achieved in the short term	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The costs involved in relation to the Directive are justified given the benefits that will be achieved in the long term	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
When considering the administrative cost, the costs are justified compared to the benefits achieved	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Further simplification of the law is possible (e.g. reducing treatment requirements and consequently costs, or monitoring and reporting requirements)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Further optimisation of the law is possible (i.e. gaining additional benefits from a similar level of costs for example by including some pollutants that could be removed at the same time than those specified in the law)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Stronger links could be made with technical progress and innovation (e.g. requiring continuous improvement of environmental performance reflecting technological progress)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The costs arising from the UWWTD, including renewal of infrastructure costs, have decreased over time	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The benefits from the UWWTD have increased over time	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**If you would like to provide further information on one of the statements above, please do so here:**

*1500 character(s) maximum*

Some monitored parameters are correlated (like suspended solids and P). It should be considered simplify the monitoring to monitor only what is strictly necessary.  
Additional parameters should be defined because they are necessary, not because technologies are available.

**Have the observed results been achieved in an efficient manner?**

	Yes	No	I do not know
Results for collecting urban waste water	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Results for treating urban waste water to a sufficient level	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Results for complying with the threshold values	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

If the results have been achieved efficiently, do you have examples of efficient implementation of the UWWTD?

*1500 character(s) maximum*



As sector we think the implementation has been done efficiently and for the examples, please refer the multiple efficient way of implementing the directive at national level. In many places there is a clear improvement of the surface water quality, which in translated in ecological recovery (increased macrobenthic life, fish populations, water mammals, ...).

**Are you aware of any problems relating to the financing and management of investments for the implementation of the Directive (e.g. building of sewerage collection systems or treatment plans)?**

- Yes
- No
- I do not know

If yes, please describe these:

*1500 character(s) maximum*

Significant financing is required to implement the Directive. However, management of waste water is only one part of urban planning. Cost are also related to road infrastructure, organisation of urban landscape, ... To leverage sufficient financing it is desirable to demonstrate multiple benefits generated by provision of waste water treatment and infrastructure (e.g. reduction in flood risk, improvements to urban quality and biodiversity etc). It becomes easier to demonstrate benefits when the requirements of the Directive is considered alongside a range of requirements (e.g. other EU directives, managing surface water, climate change, wider urban planning etc). In fact, it should be noted that if an approach is taken where only the factors identified in the Directive are subject to financing, then the resulting sewer networks are likely to be sub-optimal in the long-term.

Europe's water infrastructure is aging. Water services need more investment to maintain and renew the existing infrastructure. The price consumers pay for water services must cover the investment in new necessary infrastructure as well as the costs to maintain and renew existing one.

**In your Member State/ region/ municipality, are you aware of other type of funding / loan (e.g. funding from international institutions) available to support the implementation of the Directive?**

	Yes, funding was available	No, I am not aware of any funding	Not applicable
Member State / national level	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Regional level	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Municipal level	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

**Are the costs of complying with the Directive affecting the affordability of water services?**

- Yes
- No
- I do not know

If yes, how?

*1500 character(s) maximum*

The polluter pay principle make that the main cost is put on the water bill.

## Relevance

The analysis on relevance focuses on whether the needs and the objectives of the Directive are aligned. That is to say, whether the specifications of the UWWTD are still relevant today in achieving its objectives of protection of the environment from the adverse effects of waste water discharges.

**Are you aware of any problems/issues related to urban waste waters including their impact on the environment that the Directive does not address?**

- Yes  
 No  
 I do not know

If yes, please specify:

*1500 character(s) maximum*

UWWTD is emission oriented, setting the minimum criteria. The other problems/issues are/should be covered by WFD and other legislation, such as:

- Emerging pollutants and the principle of addressing these as much as possible at the source (not end-offpipe)
- Energy use and link with climate change
- Adaptation to climate change (water scarcity, floods, ...) and on source measures for storm water
- Role of water in the circular economy as a resource of water, sludge, nutrients, energy, ...

**Do you think the Directive is sufficiently flexible to be integrated with urban planning policies?**

- Yes  
 No  
 I do not know

If no, please specify:

*1500 character(s) maximum*

The directive is confined to emission based consents and as such does not allow flexible solutions adapted to local situations that also have to cope with other risks. The population thresholds make it very inflexible regarding the evolution of the population in urban areas. Infrastructures also have to be resilient against multiple risks that are not taken into account in the Directive. It leads also to the multiple objectives considered when designing infrastructures (flood, urban development and planning) that are not directly linked to the UWWTD and that are not included in the directive. The UWWTD is also not made to be adaptable to the long timeframe required for the urban planning.

**How relevant are the provisions of the Directive to the management of urban waste water in dispersed population or small rural communities?**

- To a large extent
- To some extent
- To no extent
- I do not know

**To what extent do you agree with the following statements?**

	To a large extent	To some extent	To no extent	I do not know
Biological oxygen demand (BOD5) is still valid as a parameter	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The limit value for BOD5 is still accurate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Chemical oxygen demand (COD) is still valid as a parameter	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The limit value for COD is still accurate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Total suspended solids (TSS) is still valid as a parameter	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The limit value for TSS is still accurate	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Nitrogen is still valid as a parameter	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The limit value for nitrogen is still accurate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Phosphorus is still valid as a parameter	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The limit value for phosphorus is still accurate	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

**To what extent do you agree with the following statements?**

	To a large extent	To some extent	To no extent	I do not know
The end of pipe approach for the collection and treatment of urban waste waters is still appropriate.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The objectives of the Directive addresses environmental protection as well as human health.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The analytical methods set out in the directive are still appropriate.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The monitoring requirements of the Directive are adequate.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The provisions related to IAS are still appropriate.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The provisions related to information to the public are sufficient and transparency is ensured.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The provisions related to reporting to the European Commission are clear.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
The biennial report by the European Commission on the implementation of the directive is useful, even if reported data are published 2-3 years later.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
There are no gaps in the scope of the UWWTD (e.g. pollutants, thresholds).	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
There are no obsolete / unnecessary provisions in the UWWTD.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The UWWTD promotes research and development.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The UWWTD encourages innovation and adaptation the uptake of the best available techniques.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The UWWTD allows for new / emerging pollutants to be considered.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The UWWTD efficiently promotes the re-use of sludge.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The UWWTD allows for effective management of sludge.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The UWWTD is compatible with the application of the circular economy principles (reduce, re-use, recycle) in the EU. ( <a href="http://ec.europa.eu/environment/circular-economy/index_en.htm">http://ec.europa.eu/environment/circular-economy/index_en.htm</a> )	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

The UWWTD promotes the uptake of an integrated approach to the management of water quality and quantity.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The UWWTD promotes the uptake of nature-based solutions (e.g. green roofs, riparian buffer strips).	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The UWWTD is compatible with the commitment to achieving the Sustainable Development Goals by 2030.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The UWWTD promotes sustainable approaches such as phosphorus and nitrogen recycling.	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
The UWWTD promotes safe waste water reuse.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
The UWWTD allows the possibility to deal with storm water overflows in an efficient manner.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>

**If you would like to comment on any of the above, please do so here:**

*1500 character(s) maximum*

The Directive is quite rigid and focus only on end-of-pipe solution. In order not to increase the cost of the Directive unnecessarily, control at source should be taken into account before increasing any of the requirements.

COD is appropriate to evaluate the biodegradability of the influent to be treated and it is a crucial measurement for process control and quick characterisation of the water.

Good phosphorus removal results in good suspended solid removal. The relevance of suspended solids removal should be assessed.

Circular economy is not considered in the Directive. Reuse of sludge or water is possible with or without the Directive but no promotion is included in the Directive itself.

Monitoring requirements does not allow for innovative monitoring while on-line analytics are a common technology nowadays.

It also does not allow for an integrated approach as the frame is very rigid.

No provision allow for the promotion of Natural Based Solutions.

Finally as N and P have to be removed to a certain level in sensitive areas, nothing allow for a sustainable approaches that could consider different level of treatment according to the quality of the receiving waters.

## Coherence

The aim of these questions is to assess the extent at which the UWWTD is coherent and articulated appropriately with other EU policies and interventions.

**To what extent are the provisions and requirements within the UWWTD coherent with each other and linked to each other, if needed?**

- To a large extent
- To some extent
- To no extent
- I do not know

**Do you wish to explain your response?**

*1500 character(s) maximum*

**Do you think the Directive is clearly drafted?**

- To a large extent
- To some extent
- To no extent
- I do not know

**If any aspects of the Directive are in your opinion unclear or missing, please indicate which ones and why:**

*1500 character(s) maximum*

The definition of the agglomeration was not well written and the guidance helped to interpret the text

**To what extent is the UWWTD coherent with the following EU water law?**

Please add comments to explain your responses in the 'comment' section below.

	To a large extent	To some extent	To no extent	I do not know
Water Framework Directive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Groundwater Directive	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Environmental Quality Standards Directive	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Floods Directive	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Bathing Water Directive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Drinking Water Directive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Nitrates Directive	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Sewage Sludge Directive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Marine Strategy Framework Directive	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Industrial Emissions Directive	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
European Pollutant Release and Transfer Register	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other (please comment below)	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

**If you would like to comment on any of the above, please do so here:**

*1500 character(s) maximum*

Waste water should continue to be excluded from waste regulation

**To what extent is the UWWTD coherent with the following EU environmental policies?**

Please add comments to explain your responses in the 'comment' section below.

	To a large extent	To some extent	To no extent	I do not know
Birds and Habitats Directives	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pesticides Framework Directive	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Circular economy strategy	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
( <a href="http://ec.europa.eu/environment/circular-economy/index_en.htm">http://ec.europa.eu/environment/circular-economy/index_en.htm</a> )	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Policies on endocrine disruptors	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Environmental Impact Assessment Directive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Strategic Environmental Assessment Directive	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sustainable development goals	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy Efficiency policies	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Greenhouse Gas emissions reduction policies	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Climate change adaptation policies	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other (please comment below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>



If you would like to comment on any of the above, please do so here:

1500 character(s) maximum

## EU added value

The aim of the questions is to gain an understanding of whether there are identifiable benefits to the fact that the law is at EU level compared to law at Member State level and whether action at EU level remains justified.

### What is the additional value from adopting law on waste water at EU level as opposed to what could be achieved at national/regional level?

Please add comments to explain your responses in the 'comment' section below.

	High additional value	Some additional value	Little additional value	No additional value	I do not know
Better waste water treatment	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Ensuring the delivery of improved collection and/or treatment of waste water	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Cleaner rivers, lakes, and seas	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Harmonisation of approaches	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Easier to access financing	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Enhanced comparability collection and treatment levels across Member States	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Faster implementation due to risk of financial sanctions at EU level	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Facilitating the compliance of other EU environmental Directives and policies	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other (please comment below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

If you would like to comment on any of the above, please do so here:

1500 character(s) maximum

To what extent do the issues addressed by the UWWTD continue to require law at EU level?

- To a large extent
- To some extent
- To no extent
- I do not know

What would be the most likely consequences of stopping or withdrawing the existing UWWTD?

- Negative impacts
- No impacts
- Positive impacts
- I do not know

If you wish to explain your response, please do so here:

*1500 character(s) maximum*

The UWWTD is setting the MINIMUM requirements at EU-level for parameters/pollutants relevant for all the member states, and as such is an important directive. More stringent consents that are adapted to local situations can then be derived in the frame of WFD, with preference for actions at the source and following the principle of the polluter pays. The latter can be covered by extended producer responsibility.

## Final questions

If you wish to expand on any of your answers or if you wish to add comments or information on anything else, which is relevant to the collection and treatment of waste water in Europe, please do so here:

*1500 character(s) maximum*

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. Industries 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 and keeping waste water services to solve only waste water issues and not chemical or waste management.

If you consider there are materials / publications available online that should be considered by us in this evaluation exercise please feel free to describe them (title and author) in the box and include any relevant links:

*1500 character(s) maximum*

## Contact

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