

Proposal for the Open Consultation:

The European Water Association (EWA) welcomes and supports the considered revision of the Urban Waste Water Treatment Directive (UWWTD) and the pursued objective of making sure that urban wastewater is clean and safe. EWA is an independent non-governmental and non-profit making organization dealing with the management and improvement of the water environment. We are one of the major professional associations in Europe that covers the whole water sector, wastewater as well as drinking water and water related waste. The aim of EWA is to provide a forum for the discussion of key technical and policy issues in Europe and its regions. This is done through conferences, workshops, meetings, special working groups of experts and through publications and web-based media. The objective of EWA is e.g. through this exchange of knowledge, to contribute to sustainable water management, a safe water supply and the protection of the water and soil environment.

This proposal was positively received by our members. It is also raising a couple of questions that would need clarification. Some of them are:

- It is important to us that the newly created “Extended producer responsibility” principle stays in the final version of the text and its scope could even be extended to more sectors. EWA also welcomes the Annex 3 “LIST OF PRODUCTS COVERED BY EXTENDED PRODUCER RESPONSIBILITY” but believes that it could already include PFAS, pesticide and biocide explicitly and to avoid any potential gap is the current texts articulation covering these products. Moreover, EWA considers the addition of an exemption clause for manufacturers whose products are put on the market in quantities of less than two tones per year to be "premature". EWA fears a "very limited implementation of EPR and a lack of application of the polluter-pays principle, particularly in countries with small populations".
- The “Energy neutrality of urban wastewater treatment plants” goal is going into the right direction for the water sector and would need some clarification. Removing micropollutants and improving energy efficiency at the same time presents a challenge for the water industry and will require innovative approaches. It may be particularly difficult to attain if the energy efficiency requirements apply to each individual plant. It is so far unclear if the goal must be met with a new energy production only developed directly inside the wastewater treatment plants or if it would be possible for the operators to buy green energy on a regional or national level. It might be impossible for each wastewater plant to produce its own renewable energy due to local technical restriction, size and location of the plant... The EWA would like to raise awareness on these issues and is expecting clarification in the future.
- The mention of “run-off” and discharge from combined sewer overflows is going into the right direction and it needs more definition to reassure the actors involved and to ensure its effective and easy implementation in relation with receiving surface water.

As previously mentioned the EWA welcomes and support the proposal that is going into the right direction for the Water Sector but some questions and need for clarification remain. Some of them will come later at a National Level but the EWA believes that the proposal could already be more precise, contain some of these answers, and that it would ensure a better implementation, more harmonized practices, in all the Members States.

EWA – Clean water for Europe & Worldwide