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FEAD position on the Commission proposal revision of the Urban Wastewater Treatment Directive

FEAD, the **European Waste Management Association** representing the private waste and resource management industry across Europe, welcomes the Commission's proposal revision of the Urban Wastewater Treatment Directive, to bring the objectives of the Directive adopted in 1991 up to date.

FEAD is aware of the importance of an updated legislation on wastewater and the role of the waste management industry to "protect the environment from adverse effects of wastewater discharges from urban sources and specific industries". Therefore, in order to contribute, FEAD sets out below its observations, comments and proposals.

Prevention and sludge treatment

FEAD has always supported the principles of prevention and source separation in waste management because proper upstream intervention has benefits on downstream treatment.

We welcome the provisions of sludge to be treated, recycled, and recovered, whenever appropriate in accordance with the waste hierarchy, as a means to further contribute to the circular economy and to soil health, returning nutrient elements. In this regard, **mainstreaming control at source of harmful pollutants is a prior condition for sustainable sludge management**. A systematic **monitoring** of the input would lead to optimise treatment processes, both to improve the final quality of treated water and sludge, but also to avoid unnecessary treatments, thus increasing efficiency and reducing costs.

Therefore, Member States shall have sufficient leeway to comply with Article 20 of the proposal, taking into consideration the local conditions and infrastructure.

Moreover, the future delegated act on the requirements for nutrients recovery needs to be linked to the revision of the Sewage Sludge Directive, otherwise it may result in a burden for wastewater operators since they will have to plan investments in a scenario of uncertain deadlines and requirements.

Quality criteria and thresholds for sludge would support the direct or indirect (composting or liming) agronomic valorisation, as well as specific process standards and thresholds for composted sludge. This measure is in line with the European zero pollution ambition, to restore soils and biodiversity, and with the objectives of the circular economy.

Quaternary treatment stage

In most of today's wastewater treatment plants, there is a three stages process to filter out as much pollution as possible. The first stage involves mechanical purification, the second stage biological purification, and the third stage chemical purification. A fourth purification stage is now intended to treat as many so-called micropollutants as possible. These micropollutants include residues of pharmaceuticals, pesticides, and of plant protection products. The European Commission rightly

identified these micropollutants as significant pollutants of wastewater that are not covered by the current legislation.

The revised Directive should also focus on a much better wastewater **monitoring** and digital data exchange, as well as centralised data collection. This would improve the detection of micropollutants in plants treating a load between 10.000 and 100.000 p.e. and help Member States to establish a list of areas on their national territory where the concentration or the accumulation of micro-pollutants represents a risk for human health or the environment.

Member States must contribute accordingly to the establishment and operation of new data infrastructures.

Extended producer responsibility

The quaternary treatment necessary to remove micro-pollutants from urban wastewater and monitoring and new advanced equipment to be installed in certain urban wastewater treatment plants will imply additional costs. **FEAD supports the polluter-pays principle** expressed in Article 191(2) of the Treaty on the Functioning of the European Union (TFEU), to cover such costs.

It is essential that the producers placing on the Union market products containing substances which, at the end of their life, are found as micro-pollutants in urban wastewaters ('micro-pollutant substances') take responsibility for the additional treatment required to remove those substances, generated in the context of their professional activities.

In this way, the polluters identified by the Commission are incentivised to minimise and eliminate the pollutants during the production process and have the possibility to deal with pollutants in a technology-open approach, with the aim to find less polluting alternatives. The **medicinal products for animal use** shall also be included in Annex 3 of the proposal because they also could be responsible for micropollutants in wastewater.

In line with the object of tackling pollution and in addition to micropollutants, the Commission's proposal should also take into account **microplastics**, which very often end up in wastewater and are responsible for pollution in sludge and treated water. It is important that they are identified as pollutants in the Directive in order to be compliant with the polluter-pays principle.

Considering that in Europe wastewater management system is already well established and functional, each Member States should be able to organise the extended producer responsibility taking into consideration the actual situation, with the possibility to involve those organisations already in place to act as intermediaries.

Energy neutrality of wastewater sector

Regarding the objective to make the wastewater sector energy-neutral in the medium term, FEAD highly supports the promotion of energy production from renewable sources. However, the primary goal of wastewater operators shall continue to be the collection and treatment of wastewater to ensure health and environmental protection.

Energy neutrality of wastewater sector should be based on an assessment of the technical and economic viability of the different measures to be implemented, considering local conditions. **The Proposal should consider a more holistic approach to allow for economically and environmentally sound investment decisions.**

It is also important to note that plants can contribute to the production of renewable energy not only on-site at the UWWTPs, but also at locations other than the plant itself. For example, thermal energy extracted from wastewater streams inside or outside the UWWTP; heat and electricity recovered from sewage sludge outside UWWTPs; biogas production in anaerobic digestion units or renewable energy purchased externally.

The reality of the sector differs widely across Europe, therefore we encourage considering renewable energy used by UWWTPs independently from its origin. Sludge that, for quality reasons, is used in agronomic recovery (direct spreading or after pre-treatment by liming) should also be taken into account, in line with the EU waste hierarchy.

Water reuse

FEAD is aware that the water resources of the Union are increasingly under pressure, resulting in permanent or temporary water scarcity in some areas of the Union. Therefore, we support the objective to respond to these issues through a wider reuse of treated urban wastewater and investments in water reuse technologies should be incentivised in the Directive.

The EU legislators should require Member States to introduce water reuse systems in areas particularly affected by drought, as well as for the irrigation of public green areas.

FEAD wants to highlight that the monitoring of wastewater and treated water is an important tool for reuse. It makes it possible to identify the type of reuse that best suits the different situations, also taking into account the local conditions of the plant.

FEAD is the European Waste Management Association, representing the private waste and resource management industry across Europe, including 18 national waste management federations and 3,000 waste management companies. Private waste management companies operate in 60% of municipal waste markets in Europe and in 75% of industrial and commercial waste. This means more than 320,000 local jobs, fuelling €5 billion of investments into the economy every year. For more information, please contact:

FEAD Secretariat

info@fead.be