

## Joint civil society priorities for the triologue negotiations on the Urban Wastewater Treatment Directive

January 2024

We, the undersigned organisations call upon all EU Member States, Members of the European Parliament and the European Commission, to adopt a strong Urban Wastewater Treatment Directive (UWWTD) that is fit for purpose to address current and emerging threats to ecosystems and human health for the coming decades.

Our society and nature pay a heavy price with regards to water pollution. Yet, the discharge of untreated and/or inadequately treated wastewater remains a main reason for the failure of good water status. As a footprint of society and our consumption and production patterns, urban wastewater contains a complex mix of domestic discharges, industrial effluents, and road runoff that needs proper treatment to achieve good water quality in the EU.

While preventing pollution at the source should always be the priority, urban wastewater treatment remains our last filter of protection before discharging into the receiving environment. Upholding an ambitious update of the Directive can address both of these objectives.

Climate change is already resulting in extended heatwaves and floods, with a high toll on human health but also at a large cost for the public budget. Integrated urban wastewater management, with an emphasis on prevention via blue-green solutions, is essential to cities' climate change adaptation and can help to reduce pollution carried by wastewater spills.

Now is the chance to update the EU's already 30-year-old wastewater rules and make them respond to the challenges of today, not least in tackling pollutants of emerging concern. The Commission has proposed an ambitious overhaul of the rules, but we are concerned about certain changes proposed by the Parliament and – in particular - the Council that would significantly weaken the Commission's proposal.

We therefore call upon national governments, Members of the European Parliament and the European Commission to safeguard the following key elements in the EU Urban Wastewater Treatment Directive in the triologue negotiations.

- **No more derogation after 2027 on existing wastewater treatment requirements.** Secondary treatment (removal of organic matter) has been a central requirement of the Directive since 1991 and should have already been fulfilled in all +2000 p.e. agglomeration by 2005 at the latest. Decentralised treatment will still be allowed where the environmental gain or costs do not warrant the building of a collection systems.
- **Coherent rules across the EU** without exemptions for selected Member States or regions.
- **Maintained ambition for micropollutant removal** by retaining 100,000 p.e. as the definition for large plants and as the cut-off threshold for mandatory tertiary and quaternary treatment.
- **Timely introduction of publicly available integrated urban wastewater management plans** with clear targets to climate-proof cities and reduce pollution from urban wastewaters.
- **No undermining of the Water Framework Directive objectives.** The 2019 fitness check concluded the Water Framework Directive is fit for purpose and its obligations have been clarified in court rulings.

- An **EPR scheme** that covers all costs related to micropollutant removal.
- An **energy neutrality target** that is truly aiming for energy neutrality, with emphasis on energy saving first in order to reduce energy consumption and to protect the public budget from volatile energy prices.
- Ensure that circularity requirements do not compromise the **EU Zero Pollution ambition** by ensuring strict pollution thresholds for wastewater and sludge reuse, in particular in agriculture.
- Secure a **comprehensive framework to prevent biomedica leakages** through preventive measures as well as **regular monitoring** of the use of this technology in WWTPs.

Delaying action, watering down the ambition or introducing loopholes to the recast law will only make it more difficult and more costly to deal with the consequences. Strong and effective measures to curb wastewater pollution is essential to achieve cleaner rivers, lakes, groundwaters and seas.

#### **Contacts:**

**Sara Johansson**, European Environmental Bureau [sara.johansson@eeb.org](mailto:sara.johansson@eeb.org)

**Lucille Labayle**, Surfrider Foundation Europe [llabayle@surfrider.eu](mailto:llabayle@surfrider.eu)

#### **Signatories:**

##### **EU-level organisations**

The European Environmental Bureau  
 Surfrider Foundation Europe  
 Wetlands International Europe  
 The European Anglers Alliance  
 Healthcare Without Harm  
 European Network of Outdoor Sports  
 Child Rights International Network (CRIN)  
 European Cave Protection Commission  
 ChemSec  
 WECF International (Women Engage for a Common Future)

##### **National organisations:**

Ecologistas en Acción  
 Ecocity  
 Dryade  
 NABU  
 Swedish Society for Nature Conservation (SSNC)  
 Arnika  
 Bund für Umwelt und Naturschutz Deutschland e.V. (BUND) Friends of the Earth Germany  
 New Water Culture Foundation

EU-level:



National organisations:



**DRYADE**



Swedish Society  
for Nature Conservation

