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# Open Public Consultation on the Revision of the Urban Waste Water Treatment Directive

Fields marked with * are mandatory.
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### Public consultation on Urban Waste Water Treatment Directive

### Introduction

### **Background**

The EU adopted the Urban Waste Water Treatment Directive (<u>UWWTD</u>) in 1991 to help improve the management of urban waste water from households and specific industries.

EU countries are required to ensure that urban waste water is collected and treated appropriately.

In 2019, the European Commission <u>evaluated the Directive</u>. It confirmed that the Directive had helped reduce the release of pollutants, e.g. organic matter, nitrogen and phosphorus, into the environment, improving the quality of EU water bodies, and that further implementation of the Directive is needed.

The evaluation showed that the Directive could be improved regarding:

- storm water overflows and urban run-off
- individual or other appropriate systems (such as septic tanks)
- small agglomerations
- updated monitoring and reporting requirements.

In addition, the discharge of micropollutants, e.g. pharmaceuticals and microplastics, into lakes, rivers and coastal areas needs to be tackled. Furthermore, the handling of indirect industrial discharges might need to be improved.

The evaluation also found that Urban Waste Water Treatment Plants (UWWTPs) could potentially become more integrated into the circular economy and more aligned with EU climate neutrality ambitions in line with the ambitions set out in the <u>Green Deal</u>, the <u>Zero Pollution Action Plan</u> and the <u>Circular Economy Action Plan</u>.

### Why are we consulting you?

The Commission has launched an <u>impact assessment</u> with a view to revise the Directive and make it fit for the future.

This questionnaire will inform the revision process, and the views collected will be considered in the impact assessment, especially when designing potential (regulatory and non-regulatory) measures to better collect and treat urban waste water and reduce the related environmental impact.

This revision is ongoing in parallel with the current evaluation of the Sewage Sludge Directive.

### Overview of the survey and survey guidelines

The survey is divided into the following parts:

- I. About you questions about yourself and why you are answering this questionnaire
- II. **Urban waste water pollution** your views on problems related to urban waste water and environmental impacts
- III. **Potential measures and their impacts** different options on how to best address water pollution through waste water collection and treatment
- IV. **Targeted consultation of expert stakeholders** technical questions regarding the Directive and possible measures
- V. **Concluding remarks** share your thoughts on the topics not covered by the questions and provide further information on best practices.

Answering Parts I, II and III does not require technical or expert knowledge of the Directive. Anybody interested in the subject can answer these parts.

Part IV is targeted at experts as it focuses on more technical aspects of the topics/measures considered by the Directive's revision. If you are an expert, please respond to all parts (I-V).

In Part V, you can upload additional information, position papers or policy briefs that express your or your organisation's position or views.

You are not obliged to respond to all the questions. Select 'I do not know/no opinion' when you do not know the answer or do not have an opinion.

The Commission will publish all responses to this public consultation. You can choose whether you want your details published or to remain anonymous.

For transparency, the type of respondent (e.g. business association, consumer association, EU citizen) country of origin, organisation name and size, and its transparency register number, are always published. Your email address will never be published.

The survey will be available online for 12 weeks. The contributions received will be aggregated and

Contact us via <u>iauwwtd@woodplc.com</u> .
Your opinion matters to us!
Thank you very much for your time.
Part I (all respondents)
About you
*Language of my contribution  Bulgarian  Croatian  Czech  Danish  Dutch  English  Estonian  Finnish  French  German  Greek  Hungarian  Irish  Italian  Latvian  Lithuanian  Maltese  Polish  Portuguese
<ul><li>Romanian</li><li>Slovak</li></ul>
Slovenian

published on the consultation page.

If you have questions:

Spanish
Swedish
*I am giving my contribution as
Academic/research institution
Business association
Company/business organisation
Consumer organisation
© EU citizen
Environmental organisation
Non-EU citizen
Non-governmental organisation (NGO)
Public authority
Trade union
Other
*First name
Pascal
*Surname
GAREL
*Email (this won't be published)
sg@hope.be
*Organisation name
255 character(s) maximum
European Hospital and Healthcare Federation
*Country of origin
Please add your country of origin, or that of your organisation.
Afghanistan Djibouti Libya Saint Martin
Aland Islands Dominica Liechtenstein Saint Pierre and Miquelon

Albania	<ul><li>Dominican</li><li>Republic</li></ul>	Lithuania	<ul><li>Saint Vincent and the Grenadines</li></ul>
Algeria	Ecuador	Luxembourg	Samoa
American Samoa	Egypt	Macau	San Marino
Andorra	El Salvador	Madagascar	São Tomé and Príncipe
Angola	Equatorial Guinea	Malawi	Saudi Arabia
Anguilla	Eritrea	Malaysia	Senegal
Antarctica	Estonia	Maldives	Serbia
Antigua and Barbuda	Eswatini	Mali	Seychelles
Argentina	Ethiopia	Malta	Sierra Leone
Armenia	Falkland Islands	Marshall Islands	Singapore
Aruba	Faroe Islands	Martinique	Sint Maarten
Australia	Fiji	Mauritania	Slovakia
Austria	Finland	Mauritius	Slovenia
Azerbaijan	France	Mayotte	<ul><li>Solomon</li><li>Islands</li></ul>
Bahamas	French Guiana	Mexico	Somalia
Bahrain	French Polynesia	Micronesia	South Africa
Bangladesh	<ul><li>French</li><li>Southern and</li><li>Antarctic Lands</li></ul>	Moldova	<ul><li>South Georgia and the South Sandwich Islands</li></ul>
Barbados	Gabon	Monaco	South Korea
Belarus	Georgia	Mongolia	South Sudan
Belgium	Germany	Montenegro	Spain
Belize	Ghana	Montserrat	Sri Lanka
Benin	Gibraltar	Morocco	Sudan
Bermuda	Greece	Mozambique	Suriname

0	Bhutan	0	Greenland	0	Myanmar	0	Svalbard and
					/Burma		Jan Mayen
	Bolivia	0	Grenada	0	Namibia	0	Sweden
	Bonaire Saint		Guadeloupe	0	Nauru		Switzerland
	Eustatius and						
	Saba						
	Bosnia and		Guam	0	Nepal		Syria
	Herzegovina						
0	Botswana		Guatemala	0	Netherlands		Taiwan
0	Bouvet Island		Guernsey		New Caledonia		Tajikistan
0	Brazil		Guinea		New Zealand		Tanzania
0	British Indian		Guinea-Bissau		Nicaragua		Thailand
	Ocean Territory						
0	British Virgin		Guyana		Niger		The Gambia
	Islands						
0	Brunei		Haiti		Nigeria		Timor-Leste
0	Bulgaria		Heard Island		Niue		Togo
			and McDonald				
			Islands				
0	Burkina Faso		Honduras		Norfolk Island		Tokelau
0	Burundi		Hong Kong		Northern		Tonga
					Mariana Islands		
0	Cambodia		Hungary		North Korea		Trinidad and
							Tobago
0	Cameroon		Iceland		North		Tunisia
					Macedonia		
0	Canada		India		Norway		Turkey
0	Cape Verde		Indonesia		Oman		Turkmenistan
0	Cayman Islands		Iran		Pakistan		Turks and
							Caicos Islands
0	Central African		Iraq		Palau		Tuvalu
	Republic						
0	Chad		Ireland		Palestine		Uganda
0	Chile		Isle of Man		Panama		Ukraine

0	China	Israel	0	Papua New	0	United Arab
				Guinea		Emirates
	Christmas	Italy		Paraguay		United
	Island					Kingdom
	Clipperton	Jamaica		Peru		United States
	Cocos (Keeling)	Japan		Philippines		United States
	Islands					Minor Outlying
						Islands
	Colombia	Jersey		Pitcairn Islands		Uruguay
	Comoros	Jordan		Poland		US Virgin
						Islands
	Congo	Kazakhstan		Portugal		Uzbekistan
	Cook Islands	Kenya		Puerto Rico		Vanuatu
0	Costa Rica	Kiribati	0	Qatar		Vatican City
0	Côte d'Ivoire	Kosovo	0	Réunion		Venezuela
0	Croatia	Kuwait	0	Romania		Vietnam
0	Cuba	Kyrgyzstan		Russia		Wallis and
						Futuna
0	Curaçao	Laos	0	Rwanda		Western
						Sahara
	Cyprus	Latvia		Saint		Yemen
				Barthélemy		
	Czechia	Lebanon		Saint Helena		Zambia
				Ascension and		
				Tristan da		
				Cunha		
0	Democratic	Lesotho	0	Saint Kitts and		Zimbabwe
	Republic of the			Nevis		
	Congo					
	Denmark	Liberia		Saint Lucia		

### \*Organisation size

- Micro (1 to 9 employees)
- Small (10 to 49 employees)
- Medium (50 to 249 employees)
- Large (250 or more)

### Transparency register number

255 character(s) maximum

Sweden

Other

Check if your organisation is on the <u>transparency register</u>. It's a voluntary database for organisations seeking to influence EU decision-making.

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In wi	nich country do you live most of the year or is your organisation based?
0	Austria
•	Belgium
0	Bulgaria
	Croatia
	Cyprus
0	Czechia
	Denmark
	Estonia
	Finland
	France
	Germany
	Greece
	Hungary
	Ireland
	Italy
	Latvia
	Lithuania
	Luxembourg
	Malta
	Netherlands
	Poland
	Portugal
	Romania
	Slovakia
	Slovenia
0	Spain

Please indicate the sector(s) you are active in [As an individual or as an
organisation; up to 3 selections possible]:
Biodiversity and/or environment
Chemical industry
Climate policy
Conservation
Energy
Food Industry
Health
Investment and finance
Marine and/or coastal management
Water industry and/or management
Pharmaceutical industry
Public sector
Scientific research
Urban planning and development
Non-governmental organisation
Waste water treatment sector
None of the above sectors
Other
I do not know, or I do not want to answer

The Commission will publish all contributions to this public consultation. You can choose whether you would prefer to have your details published or to remain anonymous when your contribution is published. Fo r the purpose of transparency, the type of respondent (for example, 'business association, 'consumer association', 'EU citizen') country of origin, organisation name and size, and its transparency register number, are always published. Your e-mail address will never be published. Opt in to select the privacy option that best suits you. Privacy options default based on the type of respondent selected

### \*Contribution publication privacy settings

The Commission will publish the responses to this public consultation. You can choose whether you would like your details to be made public or to remain anonymous.

### Anonymous

Only organisation details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published as received. Your name will not be published. Please do not include any personal data in the contribution itself if you want to remain anonymous.

### Public

Organisation details and respondent details are published: The type of respondent that you responded to this consultation as, the name of the organisation on whose behalf you reply as well as its transparency number, its size, its country of origin and your contribution will be published. Your name will also be published.

I agree with the personal data protection provisions

### Part II: Urban waste water pollution and governance (all respondents)

Urban waste water encompasses:

- all water produced as sewage from domestic waste water (residential settlements and household activities)
- some types of industrial waste water (discharges from any trade or specific industries, i.e. that produce waste water similar to domestic waste water)

Discharged water from urban and rural settings contains several contaminants and pollutants. Discharging pollutants such as hazardous chemicals, nutrients, heavy metals and disease-associated microbes, can significantly affect the water quality of freshwater and marine environments including sources of bathing and drinking water for humans. Therefore, releasing untreated waste water can severely affect human health and threaten local wildlife and their habitats.

To prevent urban waste water from damaging the environment, it is collected and treated in collective urban waste water treatment plants or equivalents, to remove organic matter and, depending on the sensitivity of the receiving lake, river or sea and the treatment plant size, nutrients.

In the following questions, we want to know how you perceive the potential problems and risks associated with urban waste water discharges.

**Please remember that you do not need to answer all of the questions.** Select the 'I do not know / no opinion' option if you do not know the answer or do not have an opinion.

## What is your level of knowledge of the following? Please note that this is about the UWWTD, not your national urban waste water legislation.

	Excellent knowledge / understanding	Good knowledge / understanding	Some knowledge / understanding	Little knowledge / understanding	None
* The UWWTD - legal text	0	0	•	0	0
* Implementing the UWWTD - practical implementation	0	0	•	0	0
* Treating urban waste water - technical knowledge	0	0	•	0	0

In your country of residence, to what extent do you think that urban waste water, i.e. domestic waste water and similar waste waters: (Please rate your level of agreement on a scale of 1 to 5: 1 = not at all; 5 = very much)

	1	2	3	4	5	I do not know / no opinion
is a current source of pollution to rivers, lakes and coastal areas	0	0	0	0	0	•
will be an increasing source of pollution to rivers, lakes and coastal areas over the next 10 years	0	0	0	0	0	•
is correctly treated before being discharged	0	0	0	0	0	•

There are several risks associated with discharging urban waste water without appropriate treatment. How concerned are you about the possible risks listed below? Please rate your concerns on a scale of 1 to 5 (1 = not at all; 5 = very much).

	1	2	3	4	5	I do not know / no opinion
Risk to human health	0	0	0	0	•	0
Risk of polluting surface waters and groundwaters	0	0	0	0	•	0
Risk of affecting agriculture and fishing resources	0	0	0	0	•	0
Risk of affecting cultural heritage and tourism	0	0	0	0	•	0
Risk of disease-associated microbes developing and spreading	0	0	0	0	•	0
Risk of polluting marine and coastal areas	0	0	0	0	•	0
Risk of contaminating drinking water	0	0	0	0	•	0
Risk of contaminating bathing waters	0	0	0	0	•	0
Risk of biodiversity loss	0	0	0	0	•	0

### Part III: Potential measures and their impacts (all respondents)

The UWWTD evaluation identified ongoing issues with untreated urban waste water due to the Directive not being fully implemented. Next to organic matter, nutrient content in waste water puts significant pressure on aquatic habitats and leads to excess nutrient levels, known as eutrophication. The nitrogen (N) and phosphorus (P) thresholds currently set in the UWWTD do not reflect current technological advancements to address nutrient removal or the severe impact that eutrophication can have on aquatic

ecosystems' stability. The concept of 'sensitive areas', which requires Member States to take additional action to protect eutrophic areas or other specific types of water bodies, has not proven entirely clear in its application.

In addition, there were also issues regarding storm water overflows, urban run-off, small cities and use of individual systems (e.g. septic tanks), which are all not sufficiently regulated. It has also found that there is a need to address micropollutants (see definitions below) which are currently not addressed by the UWWTD.

Furthermore, there might be problems with direct and indirect industrial releases into the urban waste water system, which is currently not entirely regulated. As a result, treatment levels of industrial discharges could be inadequate and remain unaddressed.

In addition, the Directive could take additional measures to ensure that the urban waste water sector better integrates with the circular economy, as not all sewage sludge and clean waste water is reused. The sector could also better align with the EU's climate ambition. The sector uses 1% of all energy consumed in the EU and could reduce its energy use, which often comes from non-renewable sources, and reduce its greenhouse gas emissions.

This creates a complex situation: an increase in treatment requirements to remove micropollutants could lead to an increase in treatment costs as well as an increase in the micropollutants' concentrations in the sludge. On top of that, additional treatment would also increase energy demands and as a result potentially increase the levels of greenhouse gas emissions from treatment plants.

As regards innovation, technological progress has been made in several areas including treatment techniques, collection, reporting, monitoring, as well as understanding the impacts of run-off and storm water overflows. Yet, the current UWWTD does not directly incentivise the adaptation to technological progress.

Lastly, the monitoring and reporting requirements in the UWWTD are outdated and do not ensure full transparency of all relevant aspects (e.g. public information), including, information based on EU spatial services, data and applications.

A range of measures is being considered to improve EU-level legislation for managing urban waste water. In the following questions, we ask your views on whether these measures are suitable to reduce waste water pollution.

#### **Definitions:**

Storm water overflows – the process by which heavy rainfall causes the discharge of untreated (but diluted) sewage into receiving waters (beaches, rivers, bathing water) through bypassing the urban waste water treatment plant. The terminology covers discharges from both combined and separate sewers without treatment.

Urban run-off – surface run-off of rainwater in urban areas. Due to the increase of impervious surfaces, the occurrence of run-off is increasing. Urban run-off can contain a range of polluting substances such as excess nutrients, pesticides, miroplastics, car engine oil as well as bacteria, sediments and turbidity.

Small cities/agglomerations, i.e. those with less than 2,000 people – these are cities that fall under the current UWWTD's scope but have very limited obligations, and do not have to report to the European Commission.

Individual and other appropriate systems (IAS) are authorised under the UWWTD and are used more frequently in some EU countries than in others. The recent evaluation of the UWWTD showed that the provisions on IAS maintenance, design and monitoring are insufficiently defined and remain unclear. IAS can be a significant source of environmental pollution.

Micropollutants, such as residues from pharmaceuticals, are pollutants detected with increasing concentrations in water sources. They are increasingly causing concern regarding their effects on human and environmental health.

# To what extent is it important that the revised legislation addresses the following topics? Please rate each topic on a scale of 1 to 5 (1 = not at all important; 5 = very important).

	1	2	3	4	5	I do not know / no opinion
Dealing with storm water overflows, through an integrated approach	0	0	0	0	0	•
Dealing with urban run-off, through an integrated approach	0	0	0	0	0	•
Addressing pollution from small cities / agglomerations	0	0	0	0	0	•
Addressing pollution from the use of individual systems	0	0	0	0	0	•
Reducing nutrient discharge into water bodies to avoid potential eutrophication	0	0	0	0	0	•
Addressing pollution from micropollutants and microplastics	0	0	0	0	0	•
Promoting the monitoring and tracking of indirect industrial releases into urban waste water streams	0	0	0	0	•	0
Better implementing the polluter pays principle, where possible	©	©	0	0	0	•
Improving UWWTPs' energy performance	0	0	0	0	0	•
Requiring UWWTPs to produce energy	0	0	0	0	0	•
Reducing UWWTPs' greenhouse gas emissions	0	0	0	0	0	•
Better promoting sludge reuse	0	0	0	0	0	•
Better promoting water reuse	0	0	0	0	0	•

Updating monitoring and reporting obligations for UWWTPs, which show whether urban waste water was sufficiently treated in the UWWTP	0	0	0	0	0	•
Requiring the use of waste water surveillance as an early warning system to prevent the spread of potential viruses and pathogens, including COVID-19	0	0	0	0	•	0
Accelerating innovation uptake in the urban waste water sector	0	0	0	0	0	•
Providing relevant information to the public	0	0	0	0	0	•
Ensuring access to justice	0	0	0	0	0	•
Other	0	0	0	0	0	•

Nature-Based Solutions (NBS) can be cost-effective in building a resilient environment. Small-scale NBS to manage rainwater run-off, e.g. porous pavements, vegetated roofs and rain gardens, can be used in urban waste water management, as well as larger-scale solutions such as constructed wetlands, swales and detention basins for both rainwater run-off and waste water treatment.

To what extent is it important that NBS play an increased role in managing urban waste water where possible? Please rate on a scale of 1 to 5 (1 = not at all important; 5 = very important).

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I do not know / no opinion

Even after urban waste water is treated, it can still contain contaminants. How important is it to step up the monitoring and removal of the below contaminants from treated urban waste water? Please rate each contaminant on a scale of 1 to 5 (1 = not at all important; 5 = very important).

	1	2	3	4	5	I do not know / no opinion
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Pharmaceutical residues (e.g. those excreted when you take medicine)	0	0	0	0	•	0
Other household waste (e.g. oil, paint, household chemicals)	0	0	0	0	0	0
Microplastics (e.g. fibers released from clothes during washing, industrial processes or particles from worn tyres)	0	0	0	0	•	0
Endocrine disruptors (i.e. substances originating from pesticides or hygiene products, containing hormones that affect the development and function of fish, animals and humans)	0	0	0	0	•	•
Pesticides (e.g. from household use or from agriculture or other professionals)	0	0	0	0	•	0
Excess nutrients (e.g. phosphorus and nitrogen not removed / recovered from waste water and discharged, causing eutrophication)	0	0	0	0	•	0
Other pollutants from industrial installations (e.g. food industry, oil and gas, battery manufacturing, iron and steel)	0	0	0	0	•	0
Other	0	0	0	0	0	•

### Which measures do you think could be efficient in removing and/or limiting the release of micropollutants into urban waste water? (Select all that apply)

at least 1 choice(s)

- Increase consumer awareness on releasing micropollutants and on safely using and disposing of products (e.g. inform consumers that unused pharmaceuticals should not be thrown in the toilet)
- ☑ Introduce further requirements for monitoring and reporting of micropollutants at urban waste water treatment plant level
- Introduce obligations for further treatment steps to remove micropollutants in urban waste water treatment plants
- ✓ Incentivise the tracking of micropollutants to their point of origin and reduce their release at their source
- Introduce new obligations on producers to finance additional treatment so that specific substances they are responsible for can be removed
- I do not know / no opinion

Would you be willing to pay higher charges for urban waste water treatment to improve facilities and implement technologies to help reduce pollution? For example, to help put in place additional treatments before the water is discharged.

- Yes, 5 % more
- Yes, 10 % more
- Yes, 15 % more
- Yes, over 15 % more
- <sup>⊚</sup> No
- I do not know / no opinion

Which groups should help to reduce the pollution caused by micropollutants passing through urban waste water treatment plants? They could contribute physically (i.e. by actively removing and/or reducing the release of micropollutants), administratively or financially. For each source of contaminants, please select the group(s) you believe should be responsible for addressing pollution caused by micropollutants.

	Governments	Municipalities	Manufacturers / producers	End users / beneficiaries of the products	Other
Source of contaminants: Households (e.g. soaps, disinfectants and pharmaceuticals disposed inappropriately or excreted)			V		
Source of contaminants: Industrial wastewater (e.g. direct and indirect industrial waste water discharges from industries such as iron, steel or food production)			V		
Source of contaminants: Urban run-off			V		
Source of contaminants: Agriculture (e.g. pesticides and excess nutrients from fertilizers)			V		

The EU has committed to achieving the transition towards climate neutrality by 2050. How do you see urban waste water collection processes and treatment plants contributing to this transition? Please rate on a scale of 1 to 5 which measures would be more efficient (1 = not at all efficient; 5 = very efficient).

Operators of urban waste water collection processes and treatment plants should :

	1	2	3	4	5	I do not know / no opinion
improve the operational management of their plants and the technologies used to support the EU's move towards mitigating greenhouse gas emissions	0	0	0	0	•	•
monitor their energy consumption and take steps to reduce their energy consumption	0	0	0	0	•	0
increasingly use renewable energy sources to power their processes, so as to reduce their greenhouse gas emissions	0	0	0	0	•	0

Marginalized and vulnerable groups (e.g. homeless people) can lack access to water and related sanitation services. This can be improved by ensuring access to toilets and/or showers. Should a revised UWWTD require EU countries to improve access to sanitation for vulnerable and marginalised groups?

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No, this should remain the responsibility of national authorities

I do not know / no opinion

### Regarding your local UWWTP, what kind of information would you be interested in accessing? Please select all that apply:

	Yes	No	I do not know / no opinion
Percentage of water not treated and/or treated outside the UWWTP	•	0	0
Real time information on water quality after treatment	•	0	0
Technologies used to treat waste water	•	0	0
Levels of contaminants detected	•	0	0

Compliance with the EU, national or regional laws	•	0	0
Destination of the waste water after treatment	•	0	0
Quality of the rivers, lakes and sea where the waste water is discharged	•	0	0
Information on collection and treatment costs	•	0	0
Sources of funding	•	0	0
Greenhouse gas emissions	•	0	0
Energy performance and efficiency	•	0	0
Destination of the sludge produced	•	0	0
Benchmark on performance of the UWWTP compared to others in your country or throughout the EU	•	0	0
Other	0	0	•

### Part IV - Targeted consultation of UWWTD (experts)

This section is addressed to expert stakeholders that have a detailed and technical knowledge of urban waste water collection and treatment in the EU and beyond.

#### **Problem definition**

The following problems have been identified:

- There are remaining loads from urban waste water that can cause pollution. This is due to:
  - the UWWTD not being fully implemented
  - urban run-off
  - storm water overflows
  - small agglomerations not complying with the same requirements as larger agglomerations
  - improper use of IAS.
- Nutrients in urban waste water still cause eutrophication and the concept of 'sensitive areas' as set out in the Directive is not sufficient to consistently protect water bodies.
- There are new types of pollution to consider, e.g. micropollutants and microplastics, releases from indirect industrial discharges, as well as growing concerns regarding anti-microbial resistance (i.e. the increasing tolerance of disease-associated microbes to antibiotics, enabling their spread).
- There is the need to explore forms of applying the polluter pays principle to support advanced treatment for the removal of micropollutants.

- The UWWTD needs to be fit for the future, which means it needs to be aligned with the EU's resource efficiency agenda and the Green Deal, through reduced greenhouse gas emissions, reduced energy use, and reuse of water and sludge.
- The current provisions on monitoring and reporting to the European Commission do not reflect the EU's digitalisation agenda and modern technological developments, such as those potentially stemming from EU spatial services, data and applications.
- The uptake of technological progress could be enhanced.
- The provisions on providing public information, transparency and public participation are weak and do not reflect current desirable levels of public engagement.

### Do you think that the above problem definition is complete?

- Yes
- No, it lacks some elements
- No, some elements need to be removed
- I do not know

### Please elaborate on your answer:

2000 character(s) maximum		

#### Possible policy measures

This section includes questions on a series of possible policy measures that could solve the problems identified. For explanations and definitions, please see previous sections.

Storm water overflows and urban run-off

How appropriate are the following proposed measures for minimising pollution through storm water overflows and urban run-off? Please rate on a scale of 1 to 5 which measures would be most appropriate (1 = not at all; 5 = very appropriate).

	1	2	3	4	5	I do not know / No opinion
Establishing an obligation for agglomerations to adopt a strategic planning approach to the management and prevention of storm water overflows and urban run-off (e.g. develop an integrated management plan for collecting systems)	0	0	0	0	0	0
Establishing EU targets regarding the management of storm water overflows and urban run-off (e.g. dilution rates, rain water treatment capacity, rain water storage capacity and minimum treatment for run-off)	0	0	0	0	0	•
Providing EU guidance on strategies for preventing, reducing and managing pollution from storm water overflows and urban run-off	0	0	0	0	0	0
Requiring the use of nature-based solutions to reduce the amount of clean water to be collected in public systems (e.g. through natural water retention measures, green urbanisation)	0	0	0	0	0	0
Inroducing continuous monitoring to measure frequency, volumes and pollution in the network to improve management	0	0	0	0	0	0
Introducing mandatory reporting for frequency and volumes of overflows	0	0	0	0	0	0
Applying a risk-based approach to deal with storm water overflows and urban run-off in line with the Water Framework Directive (WFD) objectives	0	0	0	0	0	0
To what extent do you agee with this statement: 'To be effective, action must combine several types of measures'	0	0	0	0	0	0
Other	0	0	0	0	0	0

### Smaller Agglomerations

How appropriate are the following proposed measures for addressing urban waste water pollution originating from small agglomerations? Please rate on a scale of 1 to 5 which measures would be most appropriate (1 = not at all; 5 = very appropriate).

	1	2	3	4	5	I do not know / no opinion
Progressively increasing the collection, treatment and reporting requirements for smaller categories of agglomerations	0	0	0	0	0	0
Improving the definition of 'agglomerations' based on the level of density per area	0	0	0	0	0	0
Introducing a risk-based approach for urban waste water management in agglomerations below a certain size, requiring more treatment where their discharges can cause problems	0	0	0	0	0	•
To what extent do you agree with this statement: 'To be effective, action must combine several types of measures'	0	0	0	0	0	0
Other	0	0	0	0	0	0

Individual or other Appropriate Systems (IAS)

How appropriate are the following proposed measures for improving the use of IAS and reducing pollution coming from these systems? Please rate on a scale of 1 to 5 which measures would be most appropriate (1 = not at all; 5 = very appropriate).

	1	2	3	4	5	I do not know / no opinion
Reviewing the definition of an IAS (e.g. what constitutes an IAS that would be considered acceptable under the UWWTD)	0	0	0	0	0	0
Reviewing the EU-wide standard for IAS design, operation and maintenance	0	0	0	0	0	0
Requiring EU countries to ensure connection to the public sewer systems in residential areas where such a sewer system is already in place	0	0	0	0	0	0
Requiring EU countries to keep an IAS registry to ensure that they have an overview of all IAS in use, and control their operation, technology used and maintenance	0	0	0	0	0	0

Setting out EU-level criteria for using IAS to limit their use to instances when there are no other options and adequate protection can be guaranteed	0	0	0	0	0	0
Requiring agglomerations to report to European Commission if IAS are used to collect more than X % of the load and to establish a plan for reducing IAS	0	0	0	0	0	0
Introducing a risk-based approach to managing IAS in line with the WFD objectives by allowing derogations where there is evidence that the recipient body's water quality is not affected	0	0	0	0	0	•
Providing guidance on IAS technologies, registration, monitoring and inspections	0	0	0	0	0	©
Implementing an EU-wide consumer awareness campaign on how to use IAS appropriately	0	0	0	0	0	©
To what extent do you agree with this statement: 'To be effective, action must combine several types of measures'	0	0	0	0	0	0
Other	0	0	0	0	0	0

<sup>&#</sup>x27;Sensitive areas' and nutrient removal

How appropriate are the following proposed measures for improving the designation and protection of 'sensitive areas' (e.g. areas at risk of eutrophication, bathing water sites or other) and reducing nutrient discharges? Please rate on a scale of 1 to 5 which measures would be most appropriate (1 = not at all; 5 = very appropriate).

	1	2	3	4	5	I do not know / no opinion
Improving the ways 'sensitive areas' are designated by requiring the same methodology and criteria to be used and aligning them with the Nitrates Directive and the Water Framework Directive	0	0	0	0	0	•
Based on current information data from the WFD, identifying in the revised UWWTD the most obvious areas subject to eutrophication and imposing more stringent standards for UWWTPs above a certain size	0	0	0	•	0	•
Providing EU-level guidance on how to designate 'sensitive areas', including for transboundary water bodies	0	0	0	0	0	0
Progressively over time, imposing more stringent standards for N/P treatment for all large UWWTPs above a certain size	0	0	0	0	0	0

Introducing the obligation to remove N/P also to other sizes of UWWTPs which are considered as a major remaining source of N/P based on WFD data or other relevant sources of information	0	0	0	0	0	0
Abandoning the possibility for Member States to designate less 'sensitive areas'	0	0	0	0	0	0
Introducing an obligation for additional treatment where there is a bathing site, shellfish water or a drinking water catchment downstream (and abandoning criterion b and c in Annex II)	0	0	0	•	0	•
Providing guidelines on reducing risks arising from disinfection and anitmicrobial resistance for site specific protection, e.g. bathing water sites	0	0	0	0	0	0
Introducing a risk-based approach for managing nutrient pollution in line with the WFD objectives by allowing derogations from the N & P thresholds where there is evidence that water quality of the recipient body is not affected	0	0	0	0	0	•
To what extent do you agree with this statement: 'To be effective, action must combine several types of measures'	0	0	0	0	0	0
Other	0	0	0	0	0	0

### Micropollutants

How appropriate are the following proposed measures for addressing micropollutants under the UWWTD? Please rate on a scale of 1 to 5 which measures would be most appropriate (1 = not at all; 5 = very appropriate).

	1	2	3	4	5	I do not know / no opinion
Requiring large UWWTPs to remove micropollutants based on several EU-set performance indicator substances to reduce micropollutants by X% (X to be defined based on analysis). The performance indicator substance indicates whether the treatment has worked	0	0	0	0	0	•
Introducing a risk-based approach using bioassays to identify hotspots requiring additional treatment upgrades based on chemical substances present in the water	0	0	0	0	0	0

Set an obligation for Extended Producer Responsibility Scheme to fund the upgrades of UWWTPs to improve treatment and to incentivise research and development into more sustainable chemicals upstream	0	0	0	0	0	•
Adopting EU guidance on good practices focusing on, among other things, micropollutants, antimicrobial resistance, etc.	0	0	0	0	•	0
To what extent do you agree with this statement: 'To be effective, action must combine several types of measures'	0	0	0	0	0	0
Other	0	0	0	0	0	0

How appropriate are the following proposed measures for addressing the presence of microplastics? Please rate on a scale of 1 to 5 which measures would be most appropriate (1 = not at all; 5 = very appropriate).

	1	2	3	4	5	I do not know / no opinion
Establishing thresholds for the presence of microplastics in waste water and sludge and for monitoring requirements, as long as an appropriate definition for microplastics and a methodology are provided	0	0	0	0	•	•
Providing guidance for monitoring the presence of microplastics in waste water and sludge	0	0	0	0	•	0
Introducing a requirement to monitor the presence of microplastics in waste water and sludge (particularly for large plants)	0	0	0	0	•	0
Incentivising EU countries to take measures to reduce microplastics at source and reduce their flow into urban waste water through storm water overflows and urban run-off	0	0	0	0	•	0
To what extent do you agree with this statement: 'To be effective, action must combine several types of measures'	0	0	0	0	•	0
Other	0	0	0	0	0	0

Industrial discharges

How appropriate are the following proposed measures for addressing concerns on industrial pollutants in urban waste water due to industrial discharge? Please rate on a scale of 1 to 5 which measures would be most appropriate (1 = not at all; 5 = very appropriate).

	1	2	3	4	5	I do not know / no opinion
Introducing a minimum requirement on network operators to monitor levels of pollution that may be of industrial origin across the network	0	0	0	0	•	0
Requiring that Member States establish discharge permitting systems for industries, including for small and medium-sized businesses connected to the public collection network (size of SMEs concerned to be determined by analysis)	0	0	0	0	•	0
Requiring EU countries to monitor and track (industrial) pollution in their networks and when relevant take measures to reduce pollution at source when feasible	0	0	0	0	•	0
Requiring the disconnection of industrial waste water that cannot be treated with conventional treatment from UWWTPs unless a permit exists	0	0	0	0	•	0
Requiring pre-treatment at industrial installations before waste water is discharged to urban waste water collection systems so as to prevent harmful pollutants not possible to remove in the standard UWWTPs from entering the water	0	0	0	0	•	0
Fully aligning UWWTD with the Industrial Emissions Directive by clearly setting out their scope and ensuring a similar level of standards	0	0	0	0	•	0
No action is needed - industrial discharges are handled within the industrial permits	0	0	0	0	•	0
To what extent do you agree with this statement: 'To be effective, action must combine several types of measures'	0	0	0	0	•	0
Other	0	0	0	0	0	•

### Extended Producer Responsibility (EPR) scheme

Addressing micropollutants under the UWWTD would result in further treatment costs that need to be covered. One option to cover these costs could be to extend the producer's responsibility for tackling micropollutants upstream by setting out preventative measures and supporting the cost to apply further treatment methods. This could be achieved by applying EPR.

EPR involves making those producers or importers who place products containing certain substances of concern to the market responsible for the environmental consequences. They would have to ensure that the least amount possible of these contaminants are released and provide financial support for their removal from urban waste water and sludge.

For products (or the substances contained in them) entering urban waste water, establishing an EPR scheme would have 2 main objectives:

- incentivise the initial producer to replace harmful substances used in the products with more environmentally friendly ones
- finance the additional treatment required to ensure that the harmful residues from certain substances placed on the EU market by producers/importers are reduced in or removed from urban waste water and sludge.

Can the EPR scheme incentivise e.g. the pharmaceuticals and personal care products industry and manufacturers to develop less harmful products, and /or help foster innovation in product development? Please rate on a scale of 1 to 5 (1 = not at all; 5 = very much).

	I
0	2
0	3
	4
0	5
0	I do not know / no opinion

### What factors does a successful EPR scheme depend on?

5	00 character(s) maximum	

How feasible would it be to apply EPR to tackle micropollutants from certain products in urban waste water? Please rate on a scale of 1 to 5 (1 = not at all; 5 = very much).

cry macm.
1
2
3
4
5
I do not know / no opinion

Energy use and production potential of UWWTPs and their waste water collection system

How appropriate are the following proposed measures for improving UWWTPs' energy use and emissions intensity to help achieve energy use

### reduction? Please rate on a scale of 1 to 5 which measures would be most appropriate (1 = not at all; 5 = very appropriate).

	1	2	3	4	5	I do not know / no opinion
Requiring, at first, large (and subsequently, smaller) UWWTPs and their networks to carry out energy use audits followed by action to reduce energy use over time (unless it is shown through standardised energy audits that due to local conditions it is not feasible)	0	0	0	0	0	0
Setting energy use reduction targets based on UWWTP size to be achieved gradually over time	0	0	0	0	0	0
Setting energy use reduction targets at national level rather than for individual UWWTPs	0	0	0	0	0	0
Introducing target values regarding UWWTPs renewable energy generation/self-sufficiency over time (i.e. generating energy through biogas)	0	0	0	0	0	0
To what extent do you agree with this statement: 'To be effective, action must combine several types of measures'	0	0	0	0	0	0
Other	0	0	0	0	0	0

Circular economy (sludge) and greenhouse gas emissions (incl. methane and nitrous oxide)

How appropriate are the following proposed measures for building a more circular waste water treatment sector? Please rate on a scale of 1 to 5 which measures would be most appropriate (1 = not at all; 5 = very appropriate).

	1	2	3	4	5	I do not know / no opinion
Setting minimum levels for recovering phosphorous and other materials, such as cellulose, from waste water and sludge	0	0	0	0	0	0
Imposing more stringent requirements for tracking and preventing pollution at source when the sludge produced at the UWWTP is used in agriculture	0	0	0	0	0	0
Imposing "prevention at source" strategies, specifically targeting microplastics and other micropollutants	0	0	0	0	•	0

Further encouraging water reuse in the UWWTD in line with the Water Reuse Regulation	0	0	0	0	0	0
To what extent do you agree with this statement: 'To be effective, action must combine several types of measures'	0	0	0	0	0	0
Other	0	0	0	0	0	0

How appropriate are the following proposed measures for reducing greenhouse gas emissions from the urban waste water system? Please rate on a scale of 1 to 5 which measures would be most appropriate (1 = not at all; 5 = very appropriate).

	1	2	3	4	5	I do not know / no opinion
Determining and benchmarking current levels of greenhouse gas emissions, including methane and nitrous oxide emissions, from UWWTPs, to reduce emissions in the long term	0	0	0	0	0	•
Setting emission limits for greenhouse gases for large UWWTPs	0	0	0	0	0	0
Setting emission targets at national level rather than for individual UWWTPs	0	0	0	0	0	0
Including monitoring and reporting requirements for greenhouse gas emissions	0	0	0	0	0	0
Mandating specific processes or use of technology to mitigate greenhouse gas emissions from large UWWTPs	0	0	0	0	0	0
To what extent do you agree with this statement: 'To be effective, action must combine several types of measures'	0	0	0	0	0	0
Other	0	0	0	0	0	0

### Monitoring and Reporting

How appropriate are the following proposed measures regarding the sampling frequency and monitoring standards set out in the UWWTD? Please rate on a scale of 1 to 5 which measures would be most appropriate (1 = not at all; 5 = very appropriate).

	1	2	3	4	5	I do not know / no opinion
Increasing the sampling frequency set out in Annex II taking into account the UWWTP's size	0	0	0	0	0	0
Clarifying the requirements on sampling conditions and sampling frequency to increase the consistency of results and reliability of data	0	0	0	0	0	0
Providing EU-wide guidelines to operators on 'normal operating conditions' of UWWTPs to support comparability of monitoring data	0	0	0	0	0	0
Including a new monitoring obligation for facilities above a certain threshold for relevant substances e.g. priority substances, other micropollutants, mercury and other relevant indicators	0	0	0	0	0	0
Replace monitoring of chemical oxygen demand (COD) by total organic carbon	0	0	0	0	0	0
Deleting the requirement to monitor COD	0	0	0	0	0	0
Supplementing the monitoring of water quality by monitoring water quantity in the network to better manage storm water overflows and urban run-off	0	0	0	0	0	0
Adding additional parameters (please specify below)	0	0	0	0	0	0
Please state the extent to which you agree with this statement: 'To be effective, action must combine several types of measures'	0	0	0	0	0	0
Other	0	0	0	0	0	0

How appropriate are the following proposed measures regarding the reporting requirements for a revised UWWTD? Please rate on a scale of 1 to 5 which measures would be most appropriate (1 = not at all; 5 = very appropriate).

	1	2	3	4	5	I do not know / no opinion
Adopting new reporting methods, such as the use of national datasets, that allows the European Environment Agency and the European Commission to harvest data when needed	0	0	0	•	0	•

Requiring EU countries to report concentrations instead of pass/fail results	0	0	0	0	0	0
Making centralised data at the European Environment Agency available on a website with observations /conclusions that are relevant for the general public	0	0	0	0	0	0
Ensuring that reporting requirements set out in the European Pollution Release Transfer Register (E-PRTR) and in the UWWTD are aligned	0	0	0	0	0	0
To what extent do you agree with this statement: 'To be effective, action must combine several types of measures'	0	0	0	0	0	0
Other	0	0	0	0	0	0

### Waste water surveillance

Waste water surveillance can be a tool for detecting and providing early warning of the spread of pathogens and viruses (e.g. COVID-19). The cooperation between UWWTP managers and health authorities could provide significant benefits for safeguarding human health.

If waste water surveillance were to be added in a revised UWWTD, which type of group/entity should pay any additional costs? Select all that apply.

	UW	WTP	Opera	ators
--	----	-----	-------	-------

- Local authorities
- General public, through water charges
- Health authorities
- ☐ I do not know / no opinion

How appropriate are the following options when considering measures to further enhance the use of waste water surveillance? Please rate on a scale of 1 to 5 which measures would be most appropriate (1 = not at all; 5 = very appropriate).

	1	2	3	4	5	I do not know / no opinion
Establishing EU-wide binding standards on implementing and using waste water surveillance	0	0	0	0	0	0
Providing guidelines for the collaboration between UWWTPs and health authorities	0	0	0	0	•	0

Any measure relating to implementing and applying waste water surveillance should be non-binding	0	0	0	0	0	0
To what extent do you agree with this statement: 'To be effective, action must combine several types of measures'	0	0	0	0	•	0
Other	0	0	0	0	0	0

	Other	0	0	0	0	0	0
Inn	ovation / Adaptation to technological progress						
Do	you think the revised UWWTD should include	de pr	ovisi	ons (	on ac	laptii	ng to
tec	chnological and knowledge progress? Please	erate	on a	a sca	le of	1 to	5 (1 =
no	t at all; 5 = very much).						
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	◎ 2						
	© 3						
	<sup>©</sup> 4						
	<sup>©</sup> 5						
	I do not know / no opinion						
	ease elaborate:						
20	000 character(s) maximum						
Do	you think the revised UWWTD should use E	II sn	atial	servi	ices	data	and
	plications to improve the quality of monitoring	-					
-	ssible? Please rate on scale of 1 to 5 (1 = no	•	-		•		
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	I do not know / no opinion						
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20	000 character(s) maximum						

Late implementation

In some EU countries, the UWWTD's implementation took longer than expected due to several issues including, but not limited to:

- overambitious implementation deadlines
- lack of anticipation of the scale of funding
- lack of clarification on action needed
- lack of political will.

The UWWTD's implementation and governance can be improved through better planning of investment needs (including substantial re-investments).

To what extent do you agree with the following proposals/statements on approaches to be taken to improve the planning and implementation obligations related to the waste water sector at national level? Please rate on a scale of 1 to 5 (1 = not at all; 5 = very much).

	1	2	3	4	5	I do not know / no opinion
Adjust the planning/reporting under Art. 17 and better link those planning obligations/reporting with enabling conditions to access EU funds that help with investments needed to comply with the UWWTD	0	0	0	0	•	0
Planning and implementation obligations should only be binding for those EU countries that receive significant EU funding for wastewater management in order to reduce administrative requirements for those in which EU funding only plays a small role	0	0	0	0	•	0
To what extent do you agree with this statement: 'To be effective, action must combine several types of measures'	0	0	0	0	•	0
Other	0	0	0	0	0	0

Costs and benefits

Given that limited funding is available and having in mind the main objective of protecting the environment and the climate, in which area do you think investments would be most cost effective? Please select your 3 priority areas.

at most 3 choice(s)		
Improved st	orm water overflow and urban run-off management	
Improved m	anagement of discharges from smaller agglomerations	
Improved m	anagement of individual and other appropriate systems	
Improved has	andling of 'sensitive areas' and increased nutrient removal from	
urban waste	water	
Taking action	n on the reduction of micropollutants in urban waste water	
Taking action	n on reducing energy consumption and increase of potential	
energy proc	uction at urban waste water treatment plant level	
Reduction of	f greenhouse gas emmissions	
Improved sl	udge and waste water reuse	
Part V: Conclu	ding remarks (all respondents)	
	ding remarks (all respondents)  nformation regarding potential costs and benefits relating to	 >
If you have any the measures m	nformation regarding potential costs and benefits relating to	
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If you consider there are materials / publications available online that should be further considered for this impact assessment please add them (title and author) here and include any relevant links.

5000 character(s) maximum

### Contact

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