



Revision of Urban Waste Water Treatment Directive (UWWTD) Main points for discussion

General remarks

- We welcome the revision of the directive to adapt it to the current context and emerging challenges and to align with **and give substance to the objectives of the Green Deal**.
- We emphasize that the guiding principle for the revision must be **a holistic understanding of the sources of pollution and therefore follow a risk-based approach**. Requirements as well as enforcement actions must focus on where it is the most impactful.
- National and EU regulation must **acknowledge the diversity of regional and local conditions and apply the subsidiarity principle**. It is up to member states to organise urban water management with local and regional authorities.
- Furthermore, the **implementation and reporting requirements** for local and regional authorities must be proportionate.
- The revision of the directive needs to be aligned and coordinated with existing directives, particularly the Water Framework Directive¹ to ensure that both the environment is protected in a sustainable way and that wastewater operators can operate and increase capacity according to population growth.
- In order to further increase the sustainability of the waste water chain, measures at the source of pollution are necessary and much more cost-efficient than end of pipe solutions. When it is not possible to address pollution at source, **the principle of polluter-pays is key. We also call for the Commission to introduce and extended producers' responsibility scheme**, in which producers help and contribute to the removal of specific substances. In addition, the **recovery of raw materials from wastewater and energy efficiency** will also contribute to move forward to a circular economy.

Specific issues

- **Storm water overflows and urban runoff:** good coordination between the Urban Wastewater Directive, the Water Framework Directive and the Priority Substances Directive is necessary. The preferred option is a risk-based approach in order to solve the problems of the hot spots in an environmental and cost effective manner, tailored to the local needs (MS regulations with tailored national regulations). Storm water overflows and urban runoff is already addressed by the Programmes of Measures (PoM)s under the Water Framework Directive, which point out specific treatment needs where it is necessary to achieve good quality status of the water recipient. We argue that this is an appropriate way to manage storm water overflows.
- **Smaller agglomerations and Individual and alternative systems (IAS):** The pressure on the environment from these smaller agglomerations are relatively low compared to other pressures, such as larger UWWTPs, agriculture, industry etc. **The UWWTD should maintain its focus on the bigger plants, where the bigger risks lie.** Furthermore, smaller UWWTPs

¹ Further reading: [CEMR's response to the consultation on the Water Framework Directive](#), 2019

and IAS are already regulated by national legislation and included in the Programmes of Measures under the Water Framework Directive. The requirements for IAS must be adjusted to what is environmentally motivated to meet the objectives of the WFD and this kind of risk assessment must be made locally deepening on the local pressures on the environment. In respect with a holistic approach, the cost-effectiveness and the real impact needs to be taken into account. We therefore don't support the extension of the scope of the UWWTD to smaller agglomerations and to IAS.

- **Nutrient removal and recovery:** More stringent thresholds for phosphorus are possible. 95 % reduction of P is technically achievable and suitable as a threshold emitting to P-sensitive areas. In the Netherlands, the best available technique (BAT) is applied in combination with additional treatment, if necessary, in order to achieve the water quality objectives. Thresholds can be fixed in the definition of BAT. Regarding recovery, we support minimum phosphorus recovery and other valuable material (all or only large facilities).
- **An exemption is needed for Nitrogen removal in very cold climate.** Today's threshold for N is not technically achievable or very energy costly in very cold climate.
- Furthermore, article 4.2 only acknowledges less stringent requirements for biological treatment in high mountain regions (over 1500 m above sea level). This article must be adjusted in order to ensure equal treatment for water service providers all over Europe, particularly in Nordic regions with a cold climate even at sea level.

Best practices from local and regional governments

Storm water overflows

In the Netherlands, sewage overflows have been tackled since 1990, before the Urban Wastewater Directive. Success factors for tackling sewer overflows in the Netherlands:

- Education/culture: Water is part of Dutch culture and education, because dealing with the quantity and quality of water is indispensable for physical and economic survival.
- High political priority: The Dutch municipalities have spent approximately 5 billion euros on limiting emissions from overflows. This policy is still continuing in the form of converting combined systems into separate sewer systems (disconnection).
- Shared knowledge base: In the period 1982 to 1988, a wide-ranging study was carried out by a National Working Group on Sewerage and Water Quality into a large number of aspects of the sewer overflow into surface water. Various recommendations were given a place in the 'Sewerage Guideline', on which municipalities base their sewerage policy.
- Efficiency: Dutch policy is primarily aimed at **reducing emissions** from overflows by at least 50%. Reducing the number of overflows itself was not a separate policy goal.
- In 2001 additional policy was formulated for 710 "high-risk overflows" that could pose risks to animal health, in particular watering of dairy cattle. A **risk-based approach** was used: [knelpuntencriteria riooloverstorten](#) (With summary in English).
- Currently: The WFD management plans actually show that there are no more bottlenecks in the Netherlands as a result of overflows

Spatial planning measures

Dutch municipalities are already taking a range of measures regarding the collection of rainwater in public space through advanced spatial planning. An example is the [water square](#) in Rotterdam. It combines water storage with the improvement of the quality of urban public space. The water square can be understood as a twofold strategy. It makes money invested in water storage facilities visible and enjoyable. It also generates opportunities to create environmental quality and identity to central spaces in neighborhoods. Most of the time the water square will be dry and in use as a recreational space.

The water of the deep basin flows back into the open water system of the city after a maximum of 36 hours to ensure public health. All the storm water that has been buffered does not flow into the combined system anymore. Like this the conventional mixed sewage system is relieved and lowers the frequency of his relatively dirty water to overflow in the open water whenever it reaches its buffering capacity. By separating storm water gradually from the black water system with each intervention, the entire system step by step moves towards an improvement of the overall quality of the open water in the city.

Further information about the revision of the UWWTD

- [Current urban waste water treatment directive](#)
- [Evaluation of the UWWTD \(2019\)](#)
- [10th report on the implementation of the Urban Waste Water Treatment Directive \(UWWTD\) – Press release \(Nov 2010\)](#)
- EEA briefing: [Urban waste water treatment for 21st century challenges](#)

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About CEMR

The Council of European Municipalities and Regions (CEMR) is the broadest organisation of local and regional authorities in Europe. Its members are over 60 national associations of municipalities and regions from 41 European countries. Together these associations represent some 100 000 local and regional authorities.

CEMR's objectives are twofold: to influence European legislation on behalf of local and regional authorities and to provide a platform for exchange between its member associations and their elected officials and experts.

Moreover, CEMR is the European section of United Cities and Local Governments (UCLG), the worldwide organisation of local government.

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