



8th September 2020

ESPP input to EU consultation on Inception Impact Assessment  
“Revision of the Urban Waste Water Treatment Directive”

<https://ec.europa.eu/info/law/better-regulation/have-your-say/initiatives/12405-Revision-of-the-Urban-Wastewater-Treatment-Directive>

**ESPP (European Sustainable Phosphorus Platform) welcomes the evaluation of the Urban Waste Water Treatment Directive (UWWTD) and the importance indicated for sewage sludge, considering both treatment / decontamination and “subsequent use as a fertiliser”.**

The proposed revision of the UWWTD is intrinsically linked to the Sewage Sludge Directive, for which the evaluation roadmap was submitted to public comment until 25<sup>th</sup> August 2020, and the two consultation and evaluation processes should input into one another.

As specified in the proposed Roadmap, the UWWTD revision should specifically consider “**extended producer responsibility**”, in particular for **contaminants of emerging concern** (industrial chemicals, pharmaceuticals, micro-plastics).

ESPP welcomes the aim (in key problems to address) to embed the UWWTD in the clean and circular economy (sludge management, nutrient recovery) and the reference to the Circular Economy Action Plan. In particular, the evaluation should ensure **coherence with the Integrated Nutrient Management Action Plan (INMAP) proposed in the new EU Circular Economy Action Plan**. The EU Chemicals Strategy for Sustainability (Toxic-free EU Environment) should also be taken into account.

We suggest that to emphasise that “**sludge be used in such a way that account is taken of the nutrient requirements**”, as proposed in the roadmap for the Sewage Sludge Directive. Sewage sludge contains valuable crop nutrients, in particular phosphorus, but over- or mis-application of nutrients is not effective recycling. The contribution of sludge use to soil carbon should also be considered.

Under contaminants of emerging concern (CEC), ESPP underlines the **problem of certain industrial chemicals, in particular perfluorinated chemicals (PFOS, PFOA)**, identified by many stakeholders and scientists as particularly problematic. The UK UKWIR CIP2 studies, for example, identified perfluorinated chemicals and fluoranthene, brominated flame retardants, cypermethrin and TBT as priority industrial contaminants (see <https://ukwir.org/the-national-chemicalinvestigations-programme-2015-2020-volume-3-wastewater-treatmenttechnology-trials> ) The evaluation should assess how industrial and consumer chemicals can be addressed at source by appropriate restrictions or bans.

ESPP also welcomes the recognition under problem definition that **eutrophication remains an issue to be addressed in much of the EU**. ESPP welcomes the identification of **storm overflows, agglomerations < 2 000 p.e. and autonomous wastewater treatment (septic tanks)** as issues to be addressed: inadequate treatment of each of these three is currently a significant local contributor to eutrophication and to local surface water quality failures in some places.

Finally, ESPP welcomes the recognition that **the UWWTD has been effective in reducing pollution to the environment and in improving water quality**, so making an important contribution to environmental protection, to quality of life (clean bathing waters, countryside and leisure activities) with strong economic benefits (reduced drinking water treatment costs, tourism) as well as European world leadership in water treatment know-how and technologies.

Please note that ESPP requests to be consulted in the stakeholder consultations planned to take forward both for this UWWTD evaluation and for the Sludge Directive (recent evaluation Roadmap consultation).