

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

Fields marked with * are mandatory.

Public consultation on Urban Waste Water Treatment Directive

Introduction

Background

The EU adopted the Urban Waste Water Treatment Directive ([UWWTD](#)) 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 [evaluated the Directive](#). 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 [Green Deal](#), the [Zero Pollution Action Plan](#) and the [Circular Economy Action Plan](#).

Why are we consulting you?

The Commission has launched an [impact assessment](#) 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

published on the consultation page.

If you have questions:

Contact us via iauwvtd@woodplc.com.

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
- Romanian
- Slovak
- Slovenian

- 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

Stéphanie

* Surname

Mittelham

* Email (this won't be published)

stephanie.mittelham@orgalim.eu

* Organisation name

255 character(s) maximum

Orgalim, Europe's Technology Industries

* Country of origin

Please add your country of origin, or that of your organisation.

- Afghanistan
- Djibouti
- Libya
- Saint Martin
- Åland Islands
- Dominica
- Liechtenstein
- Saint Pierre and Miquelon

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

- Bonaire Saint Eustatius and Saba
- Bosnia and Herzegovina
- Botswana
- Bouvet Island
- Brazil
- British Indian Ocean Territory
- British Virgin Islands
- Brunei
- Bulgaria
- Burkina Faso
- Burundi
- Cambodia
- Cameroon
- Canada
- Cape Verde
- Cayman Islands
- Central African Republic
- Chad
- Chile
- China
- Christmas Island
- Clipperton
- Guadeloupe
- Guam
- Guatemala
- Guernsey
- Guinea
- Guinea-Bissau
- Guyana
- Haiti
- Heard Island and McDonald Islands
- Honduras
- Hong Kong
- Hungary
- Iceland
- India
- Indonesia
- Iran
- Iraq
- Ireland
- Isle of Man
- Israel
- Italy
- Jamaica
- Nauru
- Nepal
- Netherlands
- New Caledonia
- New Zealand
- Nicaragua
- Niger
- Nigeria
- Niue
- Norfolk Island
- Northern Mariana Islands
- North Korea
- North Macedonia
- Norway
- Oman
- Pakistan
- Palau
- Palestine
- Panama
- Papua New Guinea
- Paraguay
- Peru
- Switzerland
- Syria
- Taiwan
- Tajikistan
- Tanzania
- Thailand
- The Gambia
- Timor-Leste
- Togo
- Tokelau
- Tonga
- Trinidad and Tobago
- Tunisia
- Turkey
- Turkmenistan
- Turks and Caicos Islands
- Tuvalu
- Uganda
- Ukraine
- United Arab Emirates
- United Kingdom
- United States

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

* 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

Check if your organisation is on the [transparency register](#). It's a voluntary database for organisations seeking to influence EU decision-making.

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* In which country do you live most of the year or is your organisation based?

- Austria

- Belgium
- Bulgaria
- Croatia
- Cyprus
- Czechia
- Denmark
- Estonia
- Finland
- France
- Germany
- Greece
- Hungary
- Ireland
- Italy
- Latvia
- Lithuania
- Luxembourg
- Malta
- Netherlands
- Poland
- Portugal
- Romania
- Slovakia
- Slovenia
- Spain
- Sweden
- Other

*** 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

*** If other, please specify other category**

2000 character(s) maximum

Orgalim represents Europe's technology industries, comprised of 770,000 innovative companies spanning the mechanical engineering, electrical engineering and electronics, and metal technology branches. European technology manufacturers offer innovative water technology solutions that hold enormous potential to help protect water quality and quantity. More information is available on Orgalim website at <https://orgalim.eu/>

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. **For 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	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Implementing the UWWTD - practical implementation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
* Treating urban waste water - technical knowledge	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
will be an increasing source of pollution to rivers, lakes and coastal areas over the next 10 years	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
is correctly treated before being discharged	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Risk of polluting surface waters and groundwaters	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Risk of affecting agriculture and fishing resources	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Risk of affecting cultural heritage and tourism	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Risk of disease-associated microbes developing and spreading	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Risk of polluting marine and coastal areas	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Risk of contaminating drinking water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Risk of contaminating bathing waters	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Risk of biodiversity loss	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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, microplastics, 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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Dealing with urban run-off, through an integrated approach	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Addressing pollution from small cities / agglomerations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Addressing pollution from the use of individual systems	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reducing nutrient discharge into water bodies to avoid potential eutrophication	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Addressing pollution from micropollutants and microplastics	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Promoting the monitoring and tracking of indirect industrial releases into urban waste water streams	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better implementing the polluter pays principle, where possible	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Improving UWWTPs' energy performance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Requiring UWWTPs to produce energy	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Reducing UWWTPs' greenhouse gas emissions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Better promoting sludge reuse	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Better promoting water reuse	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

*** If you selected 'Other', please elaborate:**

2000 character(s) maximum

- To boost water reuse, we welcome the new Water Reuse Regulation and call for its effective implementation. However, we believe that the UWWTD is not the appropriate legislative instrument to facilitate water reuse in industrial processes. To keep legal certainty and clarity in legal requirements, the Commission should continue to uphold the current IED for regulating any internal industrial processes, which is expected to be revised soon.
- Regarding information sharing, we stress that the quality of data is important when providing information to the public.
- On energy use, the goal of each WWTP is to have a sufficient treatment, with a good energy performance.
- Further, we support sludge reuse, which should be addressed in the Sludge Directive and not in the UWWTD.

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).

- 1
- 2
- 3
- 4
- 5

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
Pharmaceutical residues (e.g. those excreted when you take medicine)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other household waste (e.g. oil, paint, household chemicals)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Microplastics (e.g. fibers released from clothes during washing, industrial processes or particles from worn tyres)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Endocrine disruptors (i.e. substances originating from pesticides or hygiene products, containing hormones that affect the development and function of fish, animals and humans)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Pesticides (e.g. from household use or from agriculture or other professionals)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Excess nutrients (e.g. phosphorus and nitrogen not removed / recovered from waste water and discharged, causing eutrophication)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other pollutants from industrial installations (e.g. food industry, oil and gas, battery manufacturing, iron and steel)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

*** If you selected 'Other', please elaborate:**

2000 character(s) maximum

On a general note, the revised directive should mainstream digitalization in the waste water sector. Better uptake of already existing digitally enabled water technologies, such as satellite imagery, sensors and smart metering, can ensure reliable and real-time monitoring and reporting of water quality and collecting systems (crucial in the event of heavy rainfalls and storm water overflows) and discharged treated water. This would encourage, and eventually lead to, better water governance.

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
- 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)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Source of contaminants: Industrial wastewater (e.g. direct and indirect industrial waste water discharges from industries such as iron, steel or food production)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Source of contaminants: Urban run-off	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>
Source of contaminants: Agriculture (e.g. pesticides and excess nutrients from fertilizers)	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input checked="" type="checkbox"/>	<input checked="" type="checkbox"/>

*** If you selected "Other", please elaborate:**

2000 character(s) maximum

The revised Directive should incentivize full cost recovery of wastewater treatment in accordance with Article 9 of the Water Framework Directive. Given that only a few member states charge users for the full wastewater sector service, the EU should empower Member States to embrace a cost-reflective wastewater price, in a close dialogue with all water users, while raising awareness of the benefits of treating wastewater. This would also boost the roll-out of smart and environmentally-friendly water technologies in the market. It is difficult to say in percentages how much charges for urban waste water treatment should be modified.

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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
monitor their energy consumption and take steps to reduce their energy consumption	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
increasingly use renewable energy sources to power their processes, so as to reduce their greenhouse gas emissions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>

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?

- Yes
- 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	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Real time information on water quality after treatment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Technologies used to treat waste water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Levels of contaminants detected	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Compliance with the EU, national or regional laws	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Destination of the waste water after treatment	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Quality of the rivers, lakes and sea where the waste water is discharged	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Information on collection and treatment costs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Sources of funding	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Greenhouse gas emissions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Energy performance and efficiency	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Destination of the sludge produced	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Benchmark on performance of the UWWTP compared to others in your country or throughout the EU	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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

We are supportive regarding the need to explore forms of applying the polluter pays principle to support advanced treatment for the removal of micropollutants. However, this could be challenging to achieve.

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)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
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)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Providing EU guidance on strategies for preventing, reducing and managing pollution from storm water overflows and urban run-off	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Introducing continuous monitoring to measure frequency, volumes and pollution in the network to improve management	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Introducing mandatory reporting for frequency and volumes of overflows	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Applying a risk-based approach to deal with storm water overflows and urban run-off in line with the Water Framework Directive (WFD) objectives	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
To what extent do you agree with this statement: 'To be effective, action must combine several types of measures'	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

*** If you selected 'Other', please elaborate:**

2000 character(s) maximum

Better uptake of already existing digitally enabled water technologies, such as satellite imagery, sensors and smart metering, can ensure reliable and real-time monitoring and reporting of collecting systems (crucial in the event of heavy rainfalls and storm water overflows) and discharged treated water.

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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Improving the definition of 'agglomerations' based on the level of density per area	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
To what extent do you agree with this statement: 'To be effective, action must combine several types of measures'	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

*** If you selected "Other", please elaborate:**

2000 character(s) maximum

The scope should be expanded to small agglomerations and non-connected dwellings. Non-centralised wastewater treatment systems and innovative, cost-effective technologies can help addressing inadequate or missing wastewater treatment in these areas and achieving overall good water status under the WFD.

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).

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	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)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Reviewing the EU-wide standard for IAS design, operation and maintenance	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Requiring EU countries to ensure connection to the public sewer systems in residential areas where such a sewer system is already in place	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Providing guidance on IAS technologies, registration, monitoring and inspections	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Implementing an EU-wide consumer awareness campaign on how to use IAS appropriately	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
To what extent do you agree with this statement: 'To be effective, action must combine several types of measures'	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

'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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Providing EU-level guidance on how to designate 'sensitive areas', including for transboundary water bodies	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Progressively over time, imposing more stringent standards for N/P treatment for all large UWWTPs above a certain size	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Abandoning the possibility for Member States to designate less 'sensitive areas'	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
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)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Providing guidelines on reducing risks arising from disinfection and antimicrobial resistance for site specific protection, e.g. bathing water sites	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
To what extent do you agree with this statement: 'To be effective, action must combine several types of measures'	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

*** If you selected 'Other', please elaborate:**

2000 character(s) maximum

It is unclear whether the UWWTD is the right tool to regulate sensitive areas. Potentially, the Commission should consider regulating this matter within the WFD.

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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
Introducing a risk-based approach using bioassays to identify hotspots requiring additional treatment upgrades based on chemical substances present in the water	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
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	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Adopting EU guidance on good practices focusing on, among other things, micropollutants, antimicrobial resistance, etc.	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
To what extent do you agree with this statement: 'To be effective, action must combine several types of measures'	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

*** If you selected 'Other', please elaborate:**

2000 character(s) maximum

The revised Directive should deal with new contaminants, namely pharmaceuticals, both at the source and the wastewater plants level by incentivising the use of cost-effective treatment technologies. The Directive should consider addressing other contaminants once they are scientifically identified and proved to be of concern

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 /
	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

						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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Providing guidance for monitoring the presence of microplastics in waste water and sludge	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Introducing a requirement to monitor the presence of microplastics in waste water and sludge (particularly for large plants)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
To what extent do you agree with this statement: 'To be effective, action must combine several types of measures'	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Requiring EU countries to monitor and track (industrial) pollution in their networks and when relevant take measures to reduce pollution at source when feasible	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Requiring the disconnection of industrial waste water that cannot be treated with conventional treatment from UWWTPs unless a permit exists	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Fully aligning UWWTD with the Industrial Emissions Directive by clearly setting out their scope and ensuring a similar level of standards	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
No action is needed - industrial discharges are handled within the industrial permits	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
To what extent do you agree with this statement: 'To be effective, action must combine several types of measures'	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

*** If you selected 'Other', please elaborate:**

2000 character(s) maximum

The revised Directive should be coherent with the IED. We would welcome further clarity regarding industrial wastewater and requirements in the regulations/authorisations for industrial wastewater discharges into urban waste water systems.

We recognize that all discharges to sewage systems should have permit in line with the IED or the individual industrial permits. The IED should remain the main instrument for regulating industrial permits.

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).

- 1
- 2
- 3
- 4
- 5
- I do not know / no opinion

What factors does a successful EPR scheme depend on?

5000 character(s) maximum

We doubt that it could be possible to make a clear correlation between the cost and the discharge of pharmaceuticals.

The Commission's consideration to apply the extended producer responsibility (EPR) would be challenging, due to the great difficulty of interlinking the micropollutants in the effluent from waste water treatment with the producers of the original products. We draw attention to diffuse sources of pollution, the issue which has been overlooked in the current legislation.

Public awareness should be increased on use of substances that are difficult to treat in wastewater treatment plants.

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).

- 1
- 2
- 3
- 4
- 5
- I do not know / no opinion

If you selected 1 or 2, please elaborate on expected challenges:

5000 character(s) maximum

It would be difficult to make a clear EPR link to the right polluter.

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)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Setting energy use reduction targets based on UWWTP size to be achieved gradually over time	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Setting energy use reduction targets at national level rather than for individual UWWTPs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Introducing target values regarding UWWTPs renewable energy generation/self-sufficiency over time (i.e. generating energy through biogas)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
To what extent do you agree with this statement: 'To be effective, action must combine several types of measures'	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

*** If you selected 'Other', please elaborate:**

2000 character(s) maximum

The revised Directive should boost energy efficiency in the wastewater sector to contribute to achieving the climate neutrality goal by 2050, by setting concrete interim energy efficiency goals by 2030 through the Energy Efficiency Directive, set to be revised in 2021. Pave the way for plant operators to make use of already existing highly energy-efficient and energy-neutral wastewater technologies, which can also turn wastewater plants into energy producers. This is of particular relevance given that the energy use of the water sector is projected to double by 2040.

Some suggestions indicated above would contradict each other if combined. Orgalim supports both individual targets to large treatment plants and national targets.

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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Imposing more stringent requirements for tracking and preventing pollution at source when the sludge produced at the UWWTP is used in agriculture	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Imposing "prevention at source" strategies, specifically targeting microplastics and other micropollutants	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Further encouraging water reuse in the UWWTD in line with the Water Reuse Regulation	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
To what extent do you agree with this statement: 'To be effective, action must combine several types of measures'	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

*** If you selected 'Other', please elaborate:**

2000 character(s) maximum

The revised Directive should bring circularity into wastewater by elevating resource efficiency ambition. The Commission should consider setting goals and action plans for the recovery of resources from wastewater streams and incentivising water reuse, in close connection with the WFD water resource management plans.

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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Setting emission limits for greenhouse gases for large UWWTPs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Setting emission targets at national level rather than for individual UWWTPs	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Including monitoring and reporting requirements for greenhouse gas emissions	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>
Mandating specific processes or use of technology to mitigate greenhouse gas emissions from large UWWTPs	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
To what extent do you agree with this statement: 'To be effective, action must combine several types of measures'	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

*** If you selected 'Other', please elaborate:**

2000 character(s) maximum

Some suggested measures indicated above would contradict each other if combined.

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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Clarifying the requirements on sampling conditions and sampling frequency to increase the consistency of results and reliability of data	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Providing EU-wide guidelines to operators on 'normal operating conditions' of UWWTPs to support comparability of monitoring data	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Replace monitoring of chemical oxygen demand (COD) by total organic carbon	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Deleting the requirement to monitor COD	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Supplementing the monitoring of water quality by monitoring water quantity in the network to better manage storm water overflows and urban run-off	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

Adding additional parameters (please specify below)	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Please state the extent to which you agree with this statement: 'To be effective, action must combine several types of measures'	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

*** If you selected 'Other' or want to suggest additional parameters, please elaborate:**

5000 character(s) maximum

Better uptake of already existing digitally enabled water technologies, such as satellite imagery, sensors and smart metering, can ensure reliable and real-time monitoring and reporting of collecting systems and discharged treated water.

It is important that a future directive is formulated in a way to accommodate the use of new technologies for monitoring, especially online sensors and data streaming.

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

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.

- UWWTP Operators
- 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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Providing guidelines for the collaboration between UWWTPs and health authorities	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
Any measure relating to implementing and applying waste water surveillance should be non-binding	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>
To what extent do you agree with this statement: 'To be effective, action must combine several types of measures'	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>

*** If you selected 'Other', please elaborate:**

2000 character(s) maximum

Using waste water surveillance is relevant now in the time of the Covid-19 pandemic. However, its relevance should be reassessed in the future.

Innovation / Adaptation to technological progress

Do you think the revised UWWTD should include provisions on adapting to technological and knowledge progress? 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

Please elaborate:

2000 character(s) maximum

Do you think the revised UWWTD should use EU spatial services, data and applications to improve the quality of monitoring and reporting, where possible? Please rate on scale of 1 to 5 (1 = not at all; 5 = very much).

- 1
- 2
- 3
- 4
- 5
- I do not know / no opinion

Please elaborate:

2000 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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
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	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input checked="" type="radio"/>
To what extent do you agree with this statement: 'To be effective, action must combine several types of measures'	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>
Other	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>

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 storm water overflow and urban run-off management
- Improved management of discharges from smaller agglomerations
- Improved management of individual and other appropriate systems
-

Improved handling of 'sensitive areas' and increased nutrient removal from urban waste water

- Taking action on the reduction of micropollutants in urban waste water
- Taking action on reducing energy consumption and increase of potential energy production at urban waste water treatment plant level
- Reduction of greenhouse gas emissions
- Improved sludge and waste water reuse

Part V: Concluding remarks (all respondents)

If you have any information regarding potential costs and benefits relating to the measures mentioned in the previous sections, please add here and share any relevant documents, studies, links or other resources.

5000 character(s) maximum

If you wish to add further information, comments or suggestions, including examples of good or bad practice – within this questionnaire's scope – please use the box below or upload / submit your own document:

5000 character(s) maximum

Please see Orgalim's recommendations for the revision of the Urban Waste Water Treatment Directive here: <https://orgalim.eu/position-papers/environment-wastewater-matters-too-orgalims-recommendations-revision-urban-waste>

Please upload your file

Only files of the type pdf,txt,doc,docx,odt,rtf are allowed

f421ddc5-9f69-49a4-993e-909b587d4841/Orgalim_Paper_on_the_UWWTD.pdf

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

