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23rd MEETING OF THE EEA EFTA FORUM

EFTA House, Brussels

1-2 December 2022

**Opinion on the Proposal for a revised Urban Wastewater
Treatment Directive**

Rapporteur: Þórdís Lóa Þórhallsdóttir

The EEA EFTA Forum of Local and Regional Authorities:

- A. Having regard to the European Commission's proposal for a Directive of the European Parliament and of the Council concerning urban wastewater treatment (recast) (COM(2022) 541 final);
- B. Noting the role of the EFTA Forum as a body in the EFTA structure.
1. Recognises that the Urban Wastewater Treatment Directive (UWWTD) has played a crucial role in improving the quality of the rivers, lakes and seas in Europe, with a beneficial impact on our ecosystems and our citizens' health and quality of life;
 2. Welcomes that the UWWTD is being revised for the first time since its introduction 30 years ago;
 3. Notes that the UWWTD was initially limited to mainly focus on removal of nutrient and organic pollution, to prevent eutrophication and microbial contamination of pathogens;
 4. Welcomes that the issue of climate change, as well as other pollutants of concern, including microplastics and pharmaceuticals that are an increasing source of concern, are being addressed in the revision of the UWWTD;

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5. Highlights the fact that there are significant differences between European Economic Area Member States in terms of population density, the type of waters and climate as well as ecosystems at the end-of-pipe;
6. Points to the unique geographical situation of Iceland and Norway with their location to the far north, very sparsely populated regions, long coastlines, cold climate, and thus a quality of recipient substantially higher than other regions;
7. Believes that in those regions secondary treatment for removal of organic matter may not be the overall best environmental solution for all discharges, particularly to fresh water, and that the removal of phosphorous (tertiary treatment) combined with a lower level of secondary treatment can have an equal or greater environmental effect;
8. Believes that in those regions it should, for agglomerations between 1 000-100 000 pe with discharge to coastal waters, still be possible to identify less sensitive areas where studies show that discharges from less stringent treatment will not adversely affect the environment;
9. Reminds that during secondary treatment, biological processes are normally used to remove dissolved and suspended organic matter and that such biological processes may work less efficiently in the far north than in other areas of Europe;
10. Maintains that treatment requirements of tertiary treatment in the catchment area of areas sensitive to eutrophication, must be made depending on the impact on the sensitive area, including considering the retention of nitrogen in freshwater systems during transport to the sensitive area. There must be an opportunity to assess the effect and amount of pollution to the recipient of facilities in the catchment area;
11. Furthermore, is of the opinion that the directive should acknowledge that the very strict requirements for nitrogen is demanding, and should be differentiated based on plant size, recipient, and water temperature;
12. Emphasises that to obtain control at the source, treatment requirements for micropollutants must not be percentage requirements (suggested 80%), but for example measured in quantity from the treatment plant or functional requirements for the treatment step. Otherwise, it will penalise those with low concentrations in the inlet water;
13. Highlights that urban wastewater treatment systems that address pollutants such as microplastics and pharmaceuticals call for extensive infrastructure investments;

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14. Highlights that this will result in a proportionally high financial burden for small communities and is of the opinion that requirements for new wastewater treatment facilities must be based on the environmental gain of such investments;
15. Stresses that, as the EEA EFTA States do not have access to funding via the EU Structural funds, the cost for municipalities will be disproportionate unless the EEA EFTA Member States secure funding for new infrastructure and maintenance;
15. Is of the view that the revised UWWTD should focus on providing guidance on appropriate technologies and use of small and individual systems;
16. Is of the view that the use of nature-based solutions should be promoted throughout the revised UWWTD;
17. Is of the view that the precautionary principle and pollution prevention at source must be the first steps to address this issue over end-of-pipe solutions;
18. Is of the view that producers should make financial contributions to the needed treatment upgrades and new infrastructures through extended producer responsibility schemes;
19. Encourages the EU to continue its efforts in supporting improved wastewater treatment systems in the European Economic Area through the EU Programmes such as Horizon Europe and LIFE;
20. Considers that there is cause for concern whether the gain for the environment outweighs the considerable costs of more stringent provisions and urges the EEA EFTA States to consult at local government level in a timely manner regarding the effects and financing of implementation of the directive.