



European Commission
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Topic: The revision of the Urban Wastewater Directive (UWWTD)

Reaction from the Icelandic Association of Local Authorities (IALA) and the Icelandic federation of energy and utility companies (Samorka)

The Icelandic Association of Local Authorities (IALA) and the Icelandic federation of energy and utility companies (Samorka) recognise 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.

IALA and Samorka welcome that the UWWTD is being revised, with the aim to address emerging challenges, i.e. microplastics and pharmaceuticals; by making the collection and treatment of wastewater as climate neutral as possible; and the introduction of the polluter pays principle.

In addition to this, IALA and Samorka support the view that the use of nature-based solutions should be promoted throughout the revised directive and encourage the EU to continue its efforts in supporting improved wastewater treatment through EU Programmes such as Horizon Europe and LIFE.

The EEA EFTA Forum of Elected Representatives of Local and Regional Authorities issued, at its meeting on 1.-2. December 2022, an [opinion](#) on the revised UWWTD proposal. IALA's and Samorka's reactions are to a large extent based on the opinion of the EEA EFTA Forum.

In addition to that, IALA and Samorka would like to use this opportunity to highlight further some of the main concerns of the Icelandic municipalities. Furthermore, IALA and Samorka are of the opinion that the estimated costs described in connection with the revised directive will be far higher for Iceland, as our observations should indicate clearly.

Risk-based, goal orientated and flexible approach

The UWWTD is not only being implemented in the EU states, but in the European Economic Area (EEA) as a whole. IALA and Samorka therefore want to point out the significant geographical differences within Europe, and more specifically, to highlight the situation in the northern part of Europe.

These regions are, to a large extent, characterized by sparsely populated regions, long coastlines, cold climate and water temperatures. The result being that in many of these areas the quality of the recipient is substantially better than in most other regions in Europe.

For that reason, IALA and Samorka object that the revised directive does no longer address “less sensitive areas”, whereas the current directive states that while it is necessary in sensitive areas to require more stringent treatment, in some less sensitive areas a primary treatment could be considered appropriate.

The proposed treatment requirements in the revised directive are likely to entail negative environmental impact for less sensitive coastal areas, without the corresponding environmental benefits in the waterbody. Today, the Icelandic coastline is classified as less sensitive according to the requirement in the current directive. It is IALA and Samorka’s view that appropriate or primary treatment should still be sufficient in these areas. Studies indicate that in general, small discharges of biodegradable substances will not adversely affect the environment. There is no indication that the type of water treatment required by the revised directive would entail any measurable changes to the aquatic environment, while the cost for municipalities would increase significantly. In these areas it is more sustainable to let the biological degradation occur naturally in the waterbody rather than to move this process into a wastewater treatment plant. It is IALA and Samorka’s view that investments in wastewater treatment plants without a clear environmental gain should be avoided if possible, and the financial resources, along with the energy that such facilities demand, could be used in a more sustainable way for both the environment and the communities that IALA and Samorka represent.

- *Therefore, IALA and Samorka maintain that it is appropriate and justifiable, both from environmental and financial points of view that a revised directive continues to allow for the possibility to identify “less sensitive areas”, where studies show that discharges from less stringent treatment will not adversely affect the environment for agglomerations between 2,000–100,000 p.e. with discharge to coastal waters.*

This would ensure that the revised directive is risk-based, goal-oriented and flexible enough to adapt to the widely different conditions in Europe, with respect to natural and geographical conditions, population density and climate.

The proposed extension of the scope of the UWWTD

IALA and Samorka share the aim of a revised UWWTD to further reduce pollution in wastewater, while at the same time we believe that the directive should maintain its focus on bigger wastewater treatment plants and where the biggest pollution risk lies, mainly in urban areas.

In that light, IALA and Samorka have reservations about the proposed extension of the scope of the directive to 1,000 p.e. agglomerations. This raises questions relating to the cost-effectiveness of the implementation of the revised directive in areas with low population density and the level of additional environmental results. As has been stated above, IALA and Samorka are not convinced that this amendment to the directive will have a positive outcome for the environment. Legislation in this regard should rather continue to be left to individual Member States, with regard to the subsidiarity principle.

- *Therefore, IALA and Samorka would like to suggest that the current minimum of 2,000 p.e. agglomerations should continue to apply in the revised UWWTD.*

Addressing difference in geographical, climate and natural conditions

Referring to the different geographical, climate and natural conditions in the northern part of Europe, IALA and Samorka are of the view that secondary treatment for removal of organic matter may not be the overall best environmental solution for all discharges in this part of Europe, and that the removal of phosphorous (tertiary treatment) combined with a lower level of secondary treatment can have an equal or greater environmental effect.

It should also be noted 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.

IALA and Samorka are of the view that the revised directive needs to acknowledge that very strict requirements for nitrogen are demanding and should therefore be differentiated based on plant size, recipient, and water temperature.

The polluter pays principle

IALA and Samorka welcome the introduction of the polluter pays principle in the revised directive. The benefit of addressing the problem at its source, rather than relying on ever more complicated and costly wastewater treatment systems, is clear.

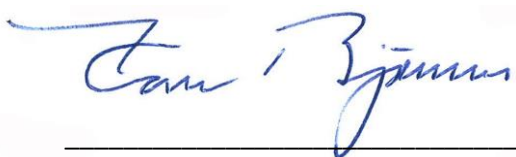
Therefore, producers should contribute to the cost of removing substances harmful for the environment from wastewater. This calls for clear rules on extended producer responsibility, that allows for a fair distribution of wastewater treatment costs between polluting sectors and urban water users.

However, for the purposes of the revised directive and with respect to requirements for the reduction of micro pollution, it is most important to implement measures at source. Only by reducing society's use of toxic and environmentally harmful substances can we protect both public health and the aquatic environment. Solitary "end-of-pipe" solutions are therefore not sustainable as a cure for this particular environmental problem. In general, the same applies for pharmaceutical residues and chemicals. A more realistic solution would be to consider more treatment of wastewater upstream from larger sources before the wastewater is collected.

Timeline for implementation

Finally, IALA and Samorka support the view that some of the deadlines in the revised directive appear to be unrealistic. As is pointed out in many opinions, implementation of the directive calls for new and/or improved infrastructure, which again is likely to call for new and/or improved national regulations, the issuing of permits, etc. IALA and Samorka therefore suggest that the timeline for implementation should be revised.

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