



# UWWTD - Urban Wastewater Treatment Directive Proposal

COM(2022) 541, 26.10.2022 ([Link](#))

## WKO Position Paper

Austrian Federal Economic Chamber (WKO)  
EU Transparency Register No 10405322962-08

September 2023

### Starting position

On 26. October 2022, as part of the EU Action Plan: “Towards Zero Pollution for Air, Water and Soil” from 12 May 2021, the European Commission published the final proposal for the Urban Wastewater Treatment Directive COM/(2022) 541 (UWWTD). The aim of the UWWTD, published in 1991, is to protect the environment from the harmful effects of urban wastewater and wastewater from certain industries. The EC has identified deficits in the original Directive, which it would like to eliminate with the proposal and at the same time implement the goals of the Green Deal.

The Austrian economy is committed to the protection of waters and the environment from the harmful effects of (urban) wastewater. The present draft provides for a large number of innovations and tightenings, some of which will have a considerable impact on the economy and businesses. Austria is one of four Member States (along with Germany, Luxembourg and the Netherlands) that already complies 100% with the current Directive on Urban Waste Water.

### Position & Wording

#### Fundamental Position

The necessary investments must be financed and these will be passed on to all sewerage users according to the pay-as-you-go principle (“*Umlageprinzip*”), which will lead to an increase in the cost of the system. We are also critical of the large number of delegated acts; it should be left to the MS to organise themselves in such a way that the organisational and administrative structures existing in the respective MS are used optimally.

#### Small wastewater treatment plants (Article 4)

We are critical of the proposed obligations/stricter regulations for small sewage treatment plants and the extension of the connection obligations, especially for remote businesses. These farms have already dealt intensively with the applicable regulations, gone through the official procedures and invested a lot to get the necessary permits in order not to need a sewer connection.

#### Combined sewer overflow (Article 5)

This regulation is still too ambiguous in that it is not clear to which wastewater parameters and to which observation period the indicative target refers.

#### 4th purification stage (Article 8)

The envisaged 4th treatment stage poses major challenges for both WWTPs and companies. Upstream partial flow treatment facilities as well as chemical, physical and/or biological pre-treatment facilities upstream of a receiving water must be taken into account in the calculation.

### **Extended Producer Responsibility (EPR) (Art 9 und 10)**

The Commission proposal for the revision of the Urban Waste Water Directive provides in Art 9 and 10 for an extended producer responsibility for pharmaceuticals and cosmetics to finance the full costs of the 4th treatment stage provided for in Art 8. With regard to a fair and proportionate cost allocation that takes into account actual emissions, all those identified as polluters should make a contribution. Due to the lack of justification concerning the choice of these two branches as biggest emitters by the Commission we doubt that a risk-based regulatory approach has actually been chosen here. Also, the timeline to full implementation by 2040 seems very ambitious, 2050 is probably more realistic for the entire expansion.

The establishment of EPR organisations must not lead to an excessive administrative burden with high costs.

### **Energy neutrality (Article 11)**

The revised UWWTD will not enter into force before 2024, after which MS have two years to transpose it into national law. Mandatory energy audits from 2025 appear to be too early. Furthermore, there should be clarification as to what "energy neutrality" means in this context.

### **Indirect discharges (Article 14)**

The current draft provides for a permit requirement for all indirect discharges; this would result in a very large administrative burden. We prefer to retain the current regulation, which works very well in Austria.

### **Water reuse (Article 15)**

This provision is not in line with Regulation (EU) 2020/741 (minimum requirements for water reuse). The latter leaves it up to the MS to decide whether they want to use treated wastewater for agricultural irrigation or not. This principle should also be followed in the present Directive.

### **Sewage sludge (Article 20)**

We welcome the fact that it is to be ensured that the member states ensure that the sewage sludge management pathways should correspond to the waste hierarchy as defined in the EU - Waste Framework Directive 2008/98/EC. We take a very negative view of a delegated act that sets minimum rates for the reuse and recycling of nitrogen.

### **Background Information**

- Austria has met all targets concerning urban waste water (collection, biological treatment, biological treatment with nitrogen and/or phosphorus removal) to a 100 %, thus being by far above EU average target achievement with 76%.
- 20.5% of the approx. 235.000 tonnes of waste water sludge in 2018 were reused in agriculture (remaining: approx. 20% reused in other areas, others disposed through incineration, landfill etc.).



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