



EUROPEAN ASSOCIATION
OF PUBLIC WATER OPERATORS

AQUA PUBLICA EUROPEA
Comments on the European Parliament's
Draft Motion for a Resolution on Pharmaceuticals in the Environment

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Aqua Publica Europea, the European Association of Public Water Operators, welcomes the European Parliament's draft Motion for a Resolution on Pharmaceuticals in the Environment, as step forward in the protection of water resources from pharmaceutical residues.

The members of Aqua Publica Europea provide quality water and sanitation services to over seventy million people throughout Europe. Based on their on-the-ground experience and expertise, we would like to share some comments on the draft Motion for a Resolution 2019/2816(RSP).

Water pollution is best addressed when prevented: once into the water system, some substances are extremely difficult to remove at treatment plant level and risk both remaining in the environment for an extended time and driving treatment costs steeply upwards. At the same time, in the case of pharmaceuticals, we acknowledge that it is critical for people to access the medicines they need. Therefore, primary actions should take a deeper look into measures that help preserve our resources' natural quality without jeopardising health: availability of greener alternatives, informed - also on environmental consequences of different options - distribution adapted to needs, and proper collection and disposal, through take-back schemes and awareness-raising at all levels.

Water is life: affordability of water services needs to be maintained. EU water legislation spells out the obligation for water operators to recover their costs of operations. When properly articulated with the 'Polluter-Pays' principle, it ensures quality water services whilst allocating the cost of environmental damage to producers of harmful products thus avoiding market distortion and favouring more environmentally-friendly practices. However, today, the application of the 'Polluter-Pays' principle remains unsatisfactory, which means that costly treatment plant upgrades risk being unfairly passed onto users' water bills. With already significant investment gaps to be bridged to comply with existing legislation (€253 billion by 2030, according to the OECD¹), higher water tariffs related to the removal of pharmaceuticals also risk impairing affordability of water, which is already at stake in certain countries (OECD). [Aqua Publica Europea published a [report on public operators' actions for water affordability](#)]

A life-cycle approach to maximise positive environmental effects and fairly distribute responsibilities. In its latest [report](#), the OECD² highlights the importance of addressing pharmaceuticals in the environment with a 'big picture' approach whereby end-of-pipe measures and plant upgrades are not solutions on their own but instead a complement to other measures along the

¹ OECD, *Investment needs in the water sector* (not yet published)

² OECD, *Report: Pharmaceutical Residues in Freshwater - Hazards and Policy Responses*, 13 November 2019, available at: <https://www.oecd.org/environment/resources/pharmaceutical-residues-in-freshwater-c936f42d-en.htm>



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medicine life-cycle. Public water operators support such a balanced approach and stay ready to take on their duties where specifically necessary and efficient.

Fostering the circular economy for bioresources. Sludge resulting from waste water treatment is instrumental to achieve circular economy objectives and better resource use, also in line with the EU Green Deal, as it has great potential for agricultural use and recovery of nutrients and energy. However, safety and quality concerns contribute to a linear situation where disposal consists growingly of incineration and landfill. But the reality is also that sludge will continue to be produced, and even increase with higher treatment requirements. Therefore, we call for the support of trust in resources through adequate EU-wide quality standards and regulation, in the context of the Sewage Sludge Directive 86/278/EEC; at-source control and a science-based approach to risks posed by pharmaceutical presence in sludge to efficiently protect health and the environment. [*Aqua Publica Europea published the [conclusions of its Thematic Workshop - Towards a sustainable approach to sludge management](#)*]

Aqua Publica Europea (APE) is the European Association of Public Water Operators. It unites publicly owned water and sanitation services and other stakeholders working to promote public water management at both European and international level. APE is an operator-led association that looks for efficient solutions that serve the public rather than corporate interests.