



EUROPEAN ASSOCIATION
OF PUBLIC WATER OPERATORS

Snapshot of opportunities and challenges

- The UWWTD proposal raises the level of ambition for water operators in terms of environmental protection, governance, and surveillance of public health parameters.
- Public water operators are ready to play their part in achieving the European Green Deal's Zero Pollution ambition.
- This will mean addressing new technical challenges and mobilising significant additional investments.
- “Context-sensitiveness” and a long-term perspective will be key to prioritising efforts and addressing scarce resources where most needed.
- The Extended Producer Responsibility scheme must be preserved and implemented correctly to ensure a fair transition.

Here is a snapshot of both some advancements and some challenges for the public water sector:



Snapshot of opportunities and challenges

1. Stormwater management

- ✓ Integrated planning
- ❖ Make obsolete recent investments made to meet local regulations
- ❖ High costs and difficulties to receive authorisations for new infrastructures in high density areas
- ❖ Short deadline encouraging grey infrastructure (e.g. water retention tanks) vs. less energy-intensive nature-based solutions



Why not adapting the 1% indicative target to the status of recipient bodies (WFD)?

2. Advanced treatment

- ✓ Environmental benefits
- ✓ Extended Producer Responsibility mechanism, which provides for a fairer distribution of costs
- ✓ Better tracking of non-domestic polluters
- ❖ Necessary trade-offs between energy efficiency and treatment requirements (e.g. ozone treatment)
- ❖ Spatial constraints for wastewater treatment plants
- ❖ Derogations and exclusion of some polluting sectors from the EPR mechanism (e.g. pesticides)

“A 1% overflow of dry weather load is extremely low. There are already local regulations in place that require treatments on combined sewer overflows. Operators and local authorities have already set a long-term plan of intervention. The new requirements in the UWWTD proposal will overcome those plans and relatively new systems could no longer be up to date. Costs and authorisations are already an issue in urbanised areas with high density.”

“The surface drainage in our small municipalities is really large and our sewage networks are not separative. As a result, storm water overflows are really strong.”

“Energy constraints could limit available technologies, such as the energy intensive ozone treatment, to carry out quaternary treatment.”

“Quaternary treatment could be an issue where there is no space left within the perimeter of the plant.”



Snapshot of opportunities and challenges

3. Energy neutrality

- ✓ Environmental benefits
- ✓ Economic and geo-political benefits
- ❖ Biogas is not economically efficient for smaller plants
- ❖ Lack of space to install enough photovoltaic panels to reach energy neutrality



Need for indication to prioritise treatment over energy neutrality where trade-off occurs

4. New limits for phosphorous (0,5 mg/L vs. 1-2 mg/L) and nitrogen (6 mg/L vs. 10-15 mg/L)

- ✓ Environmental benefits (but not always)
- ❖ No mechanism to prioritise investments depending on e.g. state of water basin quality
- ❖ Lack of coherence with circular economy objectives

“This is an ambitious and shareable objective but also very difficult to achieve. The main energy sources to reach energy neutrality are biogas and photovoltaics. Yet biogas is not technically and economically convenient for plants smaller than 30 000 - 50 000 p.e. (even assuming for all co-digestion with sludge and food waste) and there are not enough areas around the WWTPs to produce the necessary electricity with photovoltaics.”

“The new values will require big investments on new specific treatments for those pollutants. It's not clear why such strict limits are asked as some rivers in sensitive areas have a low nutrient concentration. In summer period, indirect reuse of water from rivers in agriculture is very intensive and again a certain amount of nutrient could be good for the circular economy.”