

# EU-ASE RESPONSE TO THE INCEPTION IMPACT ASSESSMENT ON THE REVISION OF THE URBAN WASTE WATER TREATMENT DIRECTIVE (UWWTD)



EUROPEAN ALLIANCE TO  
**SAVE ENERGY**

*Creating an Energy-Efficient Europe*



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## **European Alliance to Save Energy on the Inception Impact Assessment on the Revision of the Urban Waste Water Treatment Directive (UWWTD)**

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*The European Alliance to Save Energy (EU-ASE) welcomes the opportunity to provide feedback to the European Commission's publication of an inception impact assessment on the revision of the Urban Waste Water Treatment Directive (UWWTD).*

*While the Directive has played a substantial role in improving the quality of European water resources and reducing pollution levels in water bodies, we believe that Europe remains some way from full compliance with collection and treatment requirements and has made little progress with water reuse.*

*We believe the 29-year-old Directive should be updated to better address these critical issues and today's challenges including climate change, resource scarcity, increased energy consumption and population growth.*

*Based on this, EU-ASE would like to highlight the following recommendations to support the Commission in its ongoing work on the UWWTD revision.*

### **1. Digitalisation as a key opportunity**

The revised Directive shall take full advantage of new opportunities such as digitalisation. Indeed, citizens are increasingly demanding a cleaner freshwater environment, and digitalisation offers a unique opportunity to enhance information to the public. Digital technologies should be leveraged to enhance transparency on waste water management. The revised Directives should require operators to disclose their performance on a range of key indicators, including compliance of treated waste water quality, complaints on waste water management, and energy consumption.

### **2. Make use of data transparency and advanced data analytics for a knowledge based approach**

Data transparency and advanced data analytics can also enable a holistic management of the wastewater collection and treatment systems bringing significant economic, social, health and environmental benefits. Knowledge-based decision making results for example in improving the energy efficiency, treatment effectiveness, reducing failure of the infrastructure and limiting overflow of the sewer system and reducing the capital investment plan into unnecessary new infrastructure.

### **3. Preserving natural water resources with smart water management**

The Commission predicts that based on growing demand from different sector users (e.g., citizens, farmers, industry) total water abstraction in the EU will increase by 16% to 2030, increasing competition between users for fresh water resources. Accordingly, the UWWTD should address the issue of water scarcity, particularly in urban environments where demand is particularly high and water is critical to economic life and industrial production. This should include a stated objective in the directive to preserve natural water resources and for industry to employ smart water management.

#### ***4. Better legal framework for urban runoff and storm water management***

Climate change is causing EU weather patterns to become more extreme with some areas experiencing increased flooding and other areas suffering increased drought. In addition, the increase of impervious surfaces in urban areas reduces the phenomenon of infiltration and evaporation of rainwater, putting further pressure on wastewater infrastructure. The revised UWWTD should incorporate a better legal framing for urban runoff and storm water management to rebuild the natural water cycle, increase resilience and facilitate collection of storm water. Failure of the sewer network can occur from low rainwater infiltration, failure of the assets to transport wastewater (e.g. blockage of the pumping station, rupture of the wastewater pipe) and/or limited local hydraulic capacity during wet weather events. For example, the introduction of sewer overflow targets could be an appropriate EU wide harmonized approach to incentivise municipalities to exchange good practices for managing storm and sewage infrastructure and prevent sewage overflow.

#### ***5. Carbon neutral wastewater management***

The Directive should promote carbon- neutral waste water management systems plants and even incentivise plants to become net energy producers. Waste water treatment systems should reduce their energy consumption and GHG emissions, going beyond national guidance and using EU harmonised metrics and scope definitions.

#### ***6. Circular economy for water***

The UWWTD should promote circular economy for water by fostering urban waste water recovery and promoting water reuse for agricultural, municipal and industrial uses. As Article 12 of the UWWTD provides that “treated waste water shall be reused whenever appropriate”, the revised UWWTD should further promote such use by industry and municipalities, e.g. by mandating an analysis of potential reuse options, or declaring the percentage of water which could be recycled.

#### ***7. Supporting investments***

The transition of waste water management towards greater efficiency and climate neutrality will increase the need of investments. In this context, the EU and the Member States should explore all available technologies and organisational settings, and financially support the development of adapted incentives.



## About Us

The **European Alliance to Save Energy** (EU-ASE) was established in December 2010 by some of Europe's leading multinational companies. The Alliance creates a platform from which our companies (Danfoss, Kingspan, Knauf Insulation, Nalco Water, Orbital Systems, Saint-Gobain, Schneider Electric, Siemens, Signify, Veolia and Xylem Inc.) can ensure that the voice of energy efficiency is heard across the business and political community.

**EU-ASE members** have operations across the 27 Member States of the European Union, employ over 340.000 people in Europe and have an aggregated annual turnover of €115 billion.



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