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50 YEARS

Brussels, 13 October 2025

Dr. Ursula von der Leyen
President
European Commission
Rue de la Loi 200
1040 Brussels

Re: Safeguarding the EPR scheme in the recast UWWTD

Dear President von der Leyen,

CC: Executive Vice-President Séjourné and Commissioners Dombrovskis and Roswall

The EU Water Resilience Strategy rightly emphasises the importance of water resilience for Europe's citizens and businesses, while the Preparedness Union Strategy qualifies drinking water and wastewater services as essential to maintain vital societal functions.

On 1st January 2025, the recast Urban Wastewater Treatment Directive (UWWTD) entered into force, introducing ambitious new requirements to remove micropollutants from wastewater. This marks a significant milestone for the protection of public health and water resources in Europe.

A cornerstone of this legislation is the Extended Producer Responsibility (EPR) scheme, which ensures that two polluting sectors, the pharmaceuticals and cosmetics producers, cover at least 80% of the costs of the 'quaternary treatment' needed to remove micropollutants.

The EPR scheme, based on the polluter-pays principle enshrined in Article 191(2) of the TFEU, allows for an equitable distribution of wastewater treatment costs between polluting industries while assigning up to 20% of the cost to urban water users. Crucially, EPR covers both domestic producers in the EU and companies outside of Europe, thereby preventing a competitive disadvantage for EU manufacturers.

The Water Resilience Strategy rightly points out that water resilience is a significant business opportunity for EU industry. However, we should not only look at export markets but also stimulate investment at the local level. The Strategy identifies an investment gap of EUR 23 billion per year to implement the existing EU water legislation (mainly drinking water and wastewater).

The construction sector stands ready to provide the products and services to modernise and extend networks (including leakage reduction), build new treatment facilities and implement nature-based solutions. Thousands of local jobs could be secured or newly created.

The EPR scheme is a key element enabling water operators to launch the necessary investments in addition to meeting new micropollutants removal requirements. We therefore call on you to protect the EPR scheme as agreed in the UWWTD and avoid any revisions that would jeopardise a timely, equitable, and effective implementation of the recast Directive.

We remain at your disposal should you require any further information.

Yours sincerely,



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