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Brussels, 20 November 2025

Dr. Ursula von der Leyen

President

European Commission

Rue de la Loi 200

1040 Brussels

Re: Safeguarding the EPR scheme in the recast Urban Wastewater Treatment Directive

Dear President von der Leyen,

CC: Executive Vice-President Séjourné and Commissioners Hansen 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 food production, processing and distribution as well as drinking water and wastewater services as essential to maintain vital societal functions.

On 1st January 2025, the recast Urban Wastewater Treatment Directive (rUWWTD) 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 from wastewater.

While several actors are questioning the EPR, we call on you to protect this scheme as agreed in the rUWWTD. It would be most unfair to shift the financial burden for quaternary treatment from the two polluting sectors to water and wastewater service users.

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The European food supply chain is heavily dependent on high quality water and wastewater services offered at competitive prices. Farmers using clean wastewater for irrigation would be highly affected if this cost burden were passed on to them. Indeed, experience shows that farmers and food producers in rural areas would be particularly exposed to increased water tariffs, as per m³ costs in smaller wastewater treatment plants are higher than in large plants. According to first estimates, the tariffs for wastewater could increase by 15 to 50% depending on the local circumstances. This may affect both food prices and the competitiveness of the European food sector.

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, including the food supply chain. Crucially, EPR covers both domestic producers in the EU as well as companies outside of Europe, thereby preventing a competitive disadvantage of European industry.

In conclusion, we strongly believe that the rUWWTD is a crucial tool for improving Europe's water quality, protecting aquatic biodiversity and public health. Its EPR scheme is a proportionate instrument to encourage sustainable market practices and pollution reduction whilst spreading the cost of pollution equitably and protecting the European food value chain. We therefore call on the European Commission to uphold this approach 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,

Oliver Loebel

EurEau Secretary General

With the support of

Copa-Cogeca and IFOAM Organics Europe