



EPSU Position on the Revision of the Urban Wastewater Treatment Directive

The Urban Wastewater Treatment Directive has been adopted in 1991. Since then, it has set the standard for water companies, 60% of which are public, to “protect the environment from adverse effects of wastewater discharges from urban sources and specific industries.”

EPSU represents 8 million public service workers. We are the trade union federation representing workers in the water sector. We stand for a strong public water sector delivering services to all people in Europe. EPSU and affiliated unions have also mobilised almost 2 million signatures for the Right to Water Campaign, the first successful European Citizen Initiative (ECI) calling for a right to water and sanitation services.

Overall, we welcome the revision of the Urban Wastewater Treatment Directive as an opportunity to bring the Directive up to date with the demands of the Right to Water ECI, the “polluter pays” principle and the requirements of a just and rapid transition to a carbon neutral economy.

Our assessment is as follows:

- The human right to sanitation was explicitly recognized as a distinct right by the UN General Assembly in 2015. The recognition of this right in article 19 of the Directive is a success of the Right to Water Campaign. We welcome this significant step!

Around 10 million of the most vulnerable and marginalised people in the EU currently do not have access to sanitation facilities according to numbers by the European Commission. Setting up sufficient sanitation facilities in public spaces for free is crucial to improve their overall health and hygiene. The particular focus on the safety of women and girls is important and must be given due attention in the implementation by member states.

- New rules for additional treatment will result in higher costs for many municipalities. Where needed, these municipalities must be financially supported in adapting their treatment facilities. The idea of a “golden investment rule” that would allow to exempt public investment in infrastructure from strict budgetary rules is worth considering in this context.
- It should be avoided that these costs coupled with false ideas about the efficiency of Public Private Partnerships (PPPs) or concessions lead to a commercialisation of

water services. EPSU has shown that there is no evidence for benefits of such instruments.¹ Direct provision of this public service by municipalities allows for better public control and transparency. In the past, the inhabitants of large cities like Paris and Berlin have decided to take their wastewater operators back into public ownership.

- We welcome the extended producer responsibility. That the pharma and cosmetics industry – which together cause over 90% of toxic contamination and micropollutants – do not carry any of the resulting costs is not acceptable. It is important that such producer responsibility schemes should be designed and firmly kept in public hands. Companies should not have a say in how the money is spent.
- The focus on energy neutrality of wastewater treatment plants is positive and in line with the overall goals for climate neutral economy. The potential for the production of biogas from sludge should be used fully.
- Finally, guaranteeing right to water and sanitation is only possible with qualified workers. In several countries, the water sector is facing staff shortages which are expected to get worse as parts of the workforce approach retirement.

Member states should be asked to carry out systematic surveys of the personnel requirements in the water sector, including the necessary qualifications, and develop long term workforce plans together with unions. This means decent pay and conditions as well as safe workplaces in a key public sector. EPSU has published a report on high-risk labour of the workers involved, who have too often been ignored in both research and policies relating to the wastewater sector.²

Lastly, as in most utilities, women are underrepresented in technical and managerial positions. Making the water sector more accessible to women will be a key part in any sustainable solution to currently existing recruitment problems.

Therefore we ask the EU Parliament to include the following part in Article 23 (ex article 17) of the draft revised. (see page below).

¹ <https://www.epsu.org/article/public-and-private-sector-efficiency>

² <https://www.epsu.org/article/safe-jobs-circular-economy-new-epsu-report>

Article 23 (ex 17)
National implementation programme

1. By [OP please insert date = the last day of the twenty-third month after the date of entry into force of this Directive], Member States shall establish a national implementation programme for this Directive.

Those programmes shall include:

- a) an assessment of the level of implementation of Articles 3 to 8;
- b) the identification and planning of investments required to implement this Directive for each agglomeration, including an indicative financial estimation and a prioritisation of those investments related to the size of the agglomeration and the environmental impact of untreated urban wastewater;
- c) an estimate of investments needed to renew existing urban wastewater infrastructures, including collecting systems, based on their age and depreciation rates;
- d) systematic surveys of the personnel requirements in the water sector including the necessary qualifications, workforce development and occupational Health and Safety management. These should be carried out together with the social partners in the sector.***
- d) the identification, or at least an indication, of potential sources of public financing, when needed to complement user charges.