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Public Consultation on the Evaluation of the Urban Waste Water Treatment Directive (91/271/EEC)

Fields marked with * are mandatory.

Introduction

Introduction to waste water in general

In Europe, we use on average 200 litres of water per person per day. Waste water is produced as sewage from households, tourism, industries and workplaces. Before waste water is discharged into the environment, it is usually collected in sewers and then treated in waste water treatment plants or equivalents to take out harmful substances, as required by the existing EU law. Waste water can contain different types of substances and pollutants, which can cause problems in the environment (such as rivers to which the waste water is discharged and other interlinked water bodies). These pollutants can also affect human health as people come into contact with the water, for instance, through bathing.

In 1991, the European Union adopted the Urban Waste Water Treatment Directive (91/271/EEC) to help improve the management of waste water from households and specific industries (see Annex III of the Directive) across Europe. This law sets out legal obligations to ensure waste water is collected and appropriately treated before being discharged.

It has been 27 years since the Urban Waste Water Treatment Directive was adopted and the European Commission has decided to conduct an evaluation. Essentially the evaluation aims to see whether the law is doing what it is meant to do, whether its objectives are still relevant today, and whether the costs arising from the requirements of the law are justified.

Since 1991, there has been new EU law on water. For example, in 2000 the Water Framework Directive was adopted, and the law on bathing waters and drinking water has also been revised. There have also been technical advances on treatment techniques for waste water, and emerging pollutants have been identified that might require removal. Also, since 1991 the EU has been enlarged from 12 to 28 countries, increasing the total amount of waste water to be collected and treated, and presenting different experiences and challenges in the new Member States (e.g. in Scandinavia, Central and Eastern Europe and the Mediterranean islands).

For more information about waste water management in Europe, please check out these websites:

The European Commission's website about the Urban Waste Water Treatment Directive: http://ec.europa.eu/environment/water/water-urbanwaste/index_en.html

The European Environment Agency's interactive map where you can check out the situation in your country and individual waste water treatment plants: https://www.eea.europa.eu/themes/water/water-pollution/uwwtd/interactive-maps/urban-waste-water-treatment-maps

Links to various national sources of information: https://www.eea.europa.eu/themes/water-water-pollution/ /uwwtd/links-to-national-water-waste

Introduction to this consultation

The purpose of this consultation is to understand the views of the public on waste water and how it is managed. The consultation is sub-divided into three parts.

Part I: The first part asks for some information about you (such as which country you come from).

Part II: The second part is addressed to the general public. You do not need any specialist knowledge on the law or on waste water treatment to reply to this.

Part III: The third part is addressed to experts and contains more detailed and technical questions.

All of the responses to this consultation will be fully assessed and the overall results will be included in the analysis supporting the evaluation of the Urban Waste Water Treatment Directive. We will also produce a stand-alone summary of the results of the consultation (to be published here).

If you have any questions, please contact either the European Commission via ENV-URBAN-WASTE-WATER@ec.europa.eu or the project team supporting the Commission's work (UWWTDEVAL@woodplc.com).

Your voice matters and we are grateful to you for taking the time to complete this consultation.

Questionnaire

Part I - Introductory questions

*I am	replying to this questionnaire as a (representative of, where not a private citizen):
	Private citizen
0	Waste Water Treatment Plant operator or association (public)
	Waste Water Treatment Plant operator or association (private)
0	Other company or business
	Other private (including trade) association
	Other public association
0	Non-governmental organisation (NGO)

- Public authority (municipal level)
- Public authority (regional level)
- Public authority (national level)
- Public Authority (agency)

Academic/ research institute
Other (specify below)
*16 ((Masta Matay Typetmant Diant anayetay (nyihiis (nyiyata))" ay llathay agamany ay hyainaall
*If "Waste Water Treatment Plant operator (public/ private)" or "other company or business" Output Description Output Description
A large business (> 250 employees)
 A SME (50-250 employees) A very small enterprise (10-50 employees)
A very small enterprise (10-50 employees) A microenterprise (under 10 employees)
A microenterprise (under 10 employees)
If you represent an organisation, at which level do you operate?
International (non-EU and/or EU countries)
© EU
National
Regional
C Local
Other
Please indicate "EU" if representing organisations from across the EU or operating in several EU countries
*
Please provide your full name or the name of the organisation that you are representing:
1500 character(s) maximum
Finnish Water Utilities Association
If you represent an organisation, is it registered in the EU Transparency Register?
Yes
O No
I do not know
*If yes, what is the EU Transparency Register ID number?
738941118001-12
In the interests of transparency, organisations, networks, platforms or self-employed individuals engaged
in activities aimed at influencing the EU decision making process have been invited to provide the public

European institution / European agency

Code of Conduct.

Please note: If the organisation is not registered, the submission will be published separately from the registered organisations. During the analysis of replies to a consultation, contributions from respondents who choose not to register will be treated as individual contributions

with relevant information about themselves, by registering in Transparency Register and subscribing to its

(unless the contributors are recognised as representative stakeholders through Treaty provisions, European Social Dialogue, Art. 154-155 TFEU).

If your organisation is not registered, you have the opportunity to register now here.

*Please provide an email for us to follow-up to your response, if necessary:

saijariina.toivikko@vvy.fi

* Please indicate below if you want your contribution to remain anonymous:

Please find on the homepage of this survey the specific privacy statement regarding how your personal data is protected. Please note that regardless of the option chosen your answers may be subject to a request for public access to documents under Regulation (EC) No 1049 /2001. In such cases, the request will be assessed against the conditions set out in the Regulation and in accordance with applicable data protection rules.

Respondents should not include personal data in documents submitted in the context of the consultation if they opt for anonymous publication.

- I give permission for my contribution to be published with my personal information: I consent the publication of all information in my contribution in whole or in part including my name or my organisation's name, and I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication.
- My contribution can be published provided that I remain anonymous: I consent to the publication of any information in my contribution in whole or in part (which may include quotes or opinions I express) provided that it is done anonymously. I declare that nothing within my response is unlawful or would infringe the rights of any third party in a manner that would prevent publication.

Part II - General public questionnaire

All of the questions in this part of the consultation are multiple-choice questions. However, there is also the opportunity to make more in-depth comments or provide additional information in response to the last question if you wish.

Your understanding of water, waste water and your relationship with it

We interact with water every day. We drink water, use water in our daily life and we produce waste water. Many of us also enjoy swimming in lakes, rivers or the sea. To enjoy a clean environment and clean waters, it is important that our waste waters are treated before being discharged. These first questions seek to get an appreciation of how you understand your relationship with water, to understand your knowledge on how waste water in your area is being collected and treated, and if you think this is important.

Which of the following do you think are the main sources of pollution to rivers, lakes, and the sea, please provide us a ranking:

	1 - Main source	2- Not so much a source	3- Not a source	l do not know
Households (e.g. waste water from kitchens, bathrooms, etc.)	0	0	0	0
Agriculture (e.g. run-off from fields leading to pesticides, nutrients and manure entering the sewage system)	0	0	0	0
Industrial sources (e.g. waste water discharges from manufacturing activities etc.)	0	0	0	0
Urban sources (e.g. waste from the streets such as microplastics from the abrasion of tyres)	0	0	0	0

If you think there	are other impo	ortant source	es, that are no	t mentioned	above, please	comment
here:						

1.	00 character(s) maximum

Do you know how waste water is treated (cleaned) in your area?

- Yes
- I have some idea
- O No
- I am not interested in this.

Do you know who treats your waste water?

- A public company
- A private/public company
- A private company
- I have my own individual treatment plant.
- I am not interested in this.
- I do not know

Do you think that waste water is adequately treated in your area?

- Yes
- To some extent
- O No
- I do not know
- I am not interested in this.

Which of the following are according to you the benefits of treating waste water before discharging it into the environment?

To a large	To some	To no	I do not
extent	extent	extent	know

Protection of the environment including wildlife	0	0	0	0
Clean rivers	0	0	0	0
Clean seas	0	0	0	0
Clean bathing areas useable for recreation purposes	0	0	0	0
Clean drinking water	0	0	0	0
Health benefits	0	0	0	0
Reduction of odour	0	0	0	0
Removal of pollutants	0	0	0	0

Take a moment to compare the benefits of clean rivers, lakes, and the sea you have experienced (if any) to the costs that you pay for water services that partially cover the treatment of wastewater. Do you think that...:

the	costs	outweigh	the	benefits
LIIC	COSIS	OULVVCIQII	LIIC	DCHCHIG

- the costs and benefits are about the same.
- the benefits outweigh the costs.
- I do not know

Are you familiar with the EU Urban Waste Water Treatment Directive?

- I am not familiar with the Directive
- I am slightly familiar with the Directive
- I am very familiar with the Directive

Do you think that EU law on waste water has contributed to the rivers and lakes in your area being less polluted than they were in the past?

- Yes
- To some extent
- The quality has stayed the same.
- O No
- I do not know

Collection of waste water

Many households in Europe are connected to sewers that collect waste water, which is then piped to treatment works. Some households, however, have their own systems, such as septic tanks. The questions in this section ask about your connection with the sewage system. Please only answer the questions which apply to you.

Is your household connected to the public waste water collecting system?

- Yes
- O No

I do not know
Other

Treatment requirements, information to the public and perception of costs

EU law requires different types of waste water treatment. This depends on the size of the population being served by the treatment works, and whether or not the treated waters are discharged into waters that are particularly sensitive to pollution. Treatment includes removal of solid waste items, organic matter (e.g. faeces) and nutrients such as nitrogen and phosphorus, which can negatively affect rivers, lakes and coastal waters.

To have this treatment, water collection and treatment systems have to be built, maintained and operated, and therefore also to be paid for, including by the users (even if they do not pay the total cost). There are different ways this can be done. For example, households may be charged through water bills or the costs may be included in local taxation or charges.

Information to the public can help create an understanding about the costs of waste water collection, treatment and its management as well as its impact on people and the environment.

The following questions ask for your views about the adequacy of current treatment practices, your current level of information as well as your perception of the costs related to them.

Are you concerned that one or several of the following substances can be found in treated waste water?

	1- Not at all concerned	2	3	4	5- Very strongly concerned	l do not know
Pharmaceuticals (e.g. those excreted when you take medicines)	0	0	0	0	0	0
Other household waste (e.g. oil, paint, other household chemicals)	©	0	©	0	0	0
Micro plastics (e.g. fibres released from clothes during washing or particles from worn tyres)	0	0	0	0	0	0
Endocrine disruptors (i.e. substances that contain hormones that affect the development and function of animals and humans)	0	0	0	0	0	0
Pesticides (e.g. from using herbicides on your property)	0	0	0	0	0	0
Pollutants from industrial installations	0	0	0	0	0	0
Other	0	0	0	0	0	0

reatment that mig	ht be required to remove these substances may lead to a price increase in your?
Absolutely acc	eptable
Acceptable if t	he increase in costs is limited.
The initial poll	uter (e.g. industry) should pay for the removal of the pollution.
Not acceptable	€
I do not know	
If you wish to con	nment on the previous question, please do so here:
1500 character(s) m	naximum

If you are concerned about one of the above, to what extent would you accept that the additional

Do you think that you have sufficient information on the following topics?

o you think that you have sufficient information on the following topics.						
	Yes, I have sufficient information	No, but I am interested in this kind of information	No, and I am not interested in this kind of information			
Information on how my waste water is treated	0	0	0			
Information on where my waste water is treated	0	0	0			
Information on who is treating my waste water	0	0	0			
Information on where my waste water is discharged	0	0	0			
Information on the costs for treating my waste water	0	0	0			
Information on my costs in comparison to other households in the area	0	0	0			
Information on how the costs are calculated	0	0	0			
Information on investments in the treatment and sewer system in my area	0	0	0			
Information on how waste water discharges affect rivers, lakes, seas or the general environment in my area	0	0	0			

The value of having EU law on waste water

The EU Directive is one possible way to address waste water collection and treatment. Another option would be for each Member State to adopt their own law on this issue without an EU legislative framework.

When evaluating EU law it is important to check that it adds value to what could be achieved by Member States acting on their own. The following questions explore your views on this.

Do you believe that the improvements since 1991 in waste water collection and treatment,
including the construction of related infrastructure, would have happened in your country, region
or city without the EU law?
Yes, they were already in place before the EU legislation.
Yes, they would have happened anyway.
Yes, they would have happened anyway, but more slowly.
Yes, they would have happened anyway but to a lesser extent.
No, they would not have happened without EU legislation.
I do not know
Do you think there is still a need for EU law to regulate the collection and treatment of waste wate with the objective of protecting the environment?
© Yes
 Only for some aspects (i.e. protection of transboundary waters, achieving high standards across EU for the protection of the environment, sharing practices)
O No
I do not know
Conclusion
Thank you for spending time completing this questionnaire. Your answers are valuable in helping to understand people's views on this issue.
If you wish to expand on any of your answers or to add comments or information on other aspects relevant to the collection and treatment of waste water in Europe, please do so in the box below.
1500 character(s) maximum

If you would like to submit your replies to the questionnaire at this stage, please go to the end of the expert part and click on the "submit" button. You do not need to fill in the questions in that part.

Part III - Expert stakeholder questionnaire

Introduction to the expert questionnaire

The specific requirements of the Directive are:

• To collect and treat waste water from all agglomerations of more than 2,000 population equivalents (p.e.).

- To apply secondary treatment, addressed to remove organic pollution from all discharges from agglomerations of more than 2,000 p.e., or of more than 10,000 p.e. if they discharge in coastal waters or estuaries.
- To apply more advanced treatment (removal of nutrients or other types such as disinfection) for agglomerations of more than 10,000 p.e. in designated sensitive areas (e.g. where waters are at risk of receiving too high nutrient loads, bathing waters etc.).
- If it is economically infeasible or the establishment of a collecting system does not result in an environmental benefit, individual systems or other appropriate systems which reach a similar level of environmental protection, may be used.
- A requirement for authorisation of all discharges of urban wastewater (such as a permit or license), of discharges from the food-processing industry, and of industrial discharges into urban wastewater collecting systems.
- Storm water overflows: Member States can decide on measures to limit pollution from storm water overflows. These measures can be based on dilution rates or capacity in relation to dry weather flow, or can be to specify a certain number of acceptable overflows per year.
- Re-use of sewage sludge and treated waste water re-use is allowed whenever appropriate.

All significant EU law and policy is subject to evaluation. Evaluation is an analysis of whether the policy is still fit for purpose and still meets today's challenges. The evaluation is structured around five themes:

- Effectiveness: Has the Directive achieved what it set out to do? If not, why not?
- **Efficiency**: What are the costs and benefits of implementing the Directive? Are the costs justified? Are the particular requirements cost-effective compared to alternatives?
- **Coherence**: Are the requirements of the Directive consistent with those of other policies? Does any inconsistency cause practical problems?
- **Relevance**: Are the objectives and the way the Directive seeks to deliver these still correct today? Has technology moved on? Are there better solutions available?
- **EU Added Value**: What would have been the outcome without having an EU Directive? What is the justification for having EU law on this issue?

Effectiveness

The analysis of the Directive's effectiveness focuses on whether the main and specific objectives of the law have been reached, in this case, the protection of the environment from urban waste water discharges.

To what extent has the implementation of the UWWTD been effective in achieving the following objectives?

	Very effective	Somewhat effective	Neither effective nor ineffective	Somewhat ineffective	Very ineffective	l do not know
Protecting the environment from adverse effects of urban waste water discharges	•	0	0	0	0	0
Protecting human health from adverse effects of urban waste water discharges	0	•	0	0	0	0
Protecting the environment from adverse effects of waste water discharges from certain industrial sectors	0	•	0	0	0	0
Protecting human health from adverse effects of waste water discharges from certain industrial sectors	0	•	0	0	0	0
Promoting continuous improvement of environmental performance of techniques used for urban waste water treatment	0	•	0	0	0	0
Collecting waste waters	0	•	0	0	0	0
Reducing biological oxygen demand (BOD5)	0	•	0	0	0	0
Reducing chemical oxygen demand (COD)	0	•	0	0	0	0
Removal of Phosphorus	0	•	©	0	0	0
Removal of Nitrogen	•	0	©	0	0	0
Ensuring designation of sensitive areas	•	0	©	0	©	0
Ensuring a proper application of IAS (Individual or other Appropriate System)	0	•	0	0	0	0
Ensuring a proper use of CSO (Combined Sewer Overflow)	0	•	0	0	0	0

Achieving an adequate reporting of the implementation programmes	•	0	©	0	0	
Achieving an adequate management of the implementation programmes	•	0	0	0	0	0

To the best of your knowledge, are all the requirements of and enforced?	of the Dire	ective effectiv	ely implei	mented
Yes				
O No				
I do not know				
As far as you are aware, does the implementation of the regions?	UWWTD \	ary across N	lember St	ates or
(e.g. Does it vary within your country or between neighbouring countries/other cou	untries that yo	ou know of?)		
Yes				
O No				
I do not know				
If yes, please describe which provisions of the Directive are rand sampling) and some geographical examples (Member Stainconsistencies.	ate or regio	onal level) illus	strating suc	sh
(Please note that the Directive allows for some differences in implementation (e.ç				-
within designated Sensitive Areas or depending on the agglomeration's size). In a	ddition, some	EU countries are	still under trar	nsitional
periods for implementation.)				
1500 character(s) maximum				
Different mechanisms have been used to regulate storm water allowed since both local conditions as well regulative framewo				
In general, do you think that the Directive's requirements Too ambitious	are:			
Very ambitious				
Ambitious				
Somewhat ambitious				
Not ambitious enough				
I do not know				
T do not know				
In the following we would like to ask you to rate the barrie Please firstly indicate the level at which you would like to EU level Member State level Local level		•	on of the I	Directive.
Please rate the following (potential) barriers at <i>Member St</i> Directive	tate level t	to the full imp	olementati	on of the
	Low barrier	Moderate barrier	High barrier	I do not know

Lack of governance	•	0	0	0
Lack of political will	•	0	0	0
Lack of funding	0	•	0	0
Inadequate dimensioning of treatment plants	•	0	0	0
Inadequate treatment level applied	•	0	0	0
Obsolescence of infrastructure: collection network	0	•	0	0
Obsolescence of infrastructure: treatment plants	•	0	0	0
Difference in interpretation of key provisions among Member States/regions/local areas	•	0	0	0
Poor application of measures for storm water overflows	•	0	0	0
Wrong use of Individual or other Appropriate Systems (IAS)	0	•	0	0
Other	0	0	0	0

Which of the following elements contributed to the achievement of the objectives of the Directive? Please specify to what extent they had an impact on achieving the objectives.

	Adverse impact	No impact	Some impact	High impact	l do not know
Clarity with regards to the scope of the Directive (e.g. population thresholds, type of pollutants)	0	0	0	•	0
Clarity with regards to the overall requirements of the Directive to collect waste water	0	0	•	0	0
Clarity with regards to the overall requirements of the Directive to treat waste water	0	0	•	0	0
Clarity with regards to the overall reporting requirements by Member States to the European Commission	0	0	•	0	0
Clarity with regards to specific pollutants controlled by the Directive and related thresholds (BOD5, COD, TSS, Phosphorus and Nitrogen)	0	0	•	0	0
Clarity with regards to the provision related to individual or other appropriate systems	0	0	•	0	0
Clarity with regards to the provisions related to storm water overflows	0	0	•	0	0

		0	•	0	0
Clarity with regards to the provisions related to sensitive areas (e.g. on designation)	0	0	0	•	0
Clarity with regards to the provisions related to providing information to the public	0	0	•	0	0
The European Commission's approach to infringements by Member States	0	0	•	0	0
The European Union's support to implement the directive (e.g. funding)	0	0	•	0	0
Other elements	0	0	0	0	0
Do you have any information on storm water overflo	ows?				
 Yes No What is the frequency of overflows in your area? At every storm (monthly or more frequent) At every major storm (less than 5 times/ year) Exceptional (once or twice a year) I do not have this information 					

What is the share of combined versus separate sewer networks in your region/municipality /country?

Please indicate (xx% combined sewer and xx% separate sewer) as well as the name of your region /municipality/country:

1500	/	/ / 1	maximi	
75/1/1	chara	CTORICI	mavimi	Im

rie	at is the typical design dilutio ase indicate:					
11						
	500 character(s) maximum e dilution rate is defined by the typical flo	w threshold at w	hich overflow begins a	nd is the ratio of	sewer conveyance to wa	etowater
	w. For instance, in a combined sewer with					
flov	w above which overflow occurs during sto	orms (i.e., a conv	veyance) of 500 l/s, the	dilution rate is 5		
Do	you have any data on overflow	w frequencie	es and volumes?			
(Yes					
(○ No					
	bsite, name of document/stud		internet Overfless	o o vont	togother with the 180	N/TD
	All WWTP results in Finland are a results: https://raportit.ymparisto.f20kuormitus%20ja%20puhdistusi	i/ReportServe				VIP
	ernatively, please upload your e maximum file size is 1 MB	information	n here:			
	at are the unintended (positive		e) consequences	of the Direc	tive?	
	at are the unintended (positive sitive unintended consequence		e) consequences	of the Direc	etive?	
			e) consequences	have	are/is not an	1
		res		have /has		l do
		r es have	have/has	have /has not	are/is not an	not
		have /has	have/has occured to a	have /has	are/is not an unintended	'
		have /has	have/has occured to a	have /has not	are/is not an unintended	not
	sitive unintended consequend	have /has occured	have/has occured to a certain extent	have /has not occured	are/is not an unintended consequences	not know
	sitive unintended consequend Lower costs than expected	have /has occured	have/has occured to a certain extent	have /has not occured	are/is not an unintended consequences	not know

Increase in skills of workers dealing with waste water management	©	•	©	©	0
Strong development of the water sector due to the directive	0	•	0	0	0
Other positive unintended consequences	0	0	0	0	0

Negative unintended consequences

	have /has occured	have/has occured to a certain extent	have /has not occured	are/is not an unintended consequences	l do not know
Higher costs than expected	0	•	0	0	0
Inappropriate investment (e.g. investments in too small or too large treatment plants)	0	•	0	0	0
Increased amounts of pollutants in sludge	0	0	•	0	0
Decreased nutrient content of sludge	0	0	•	0	0
Discouragement of continuous technical improvements	0	0	•	0	0
Other negative unintended consequences	0	0	0	0	0

Efficiency

Are you aware of any annual average estimates for the following cost categories of complying with the Directive? These might be costs at water treatment plant level, regional level or country level. Note that we understand some activities are more relevant to operators and some to regulators, so please respond where you can.

Costs in relation to the Urban Waste Water Treatment Directive:

	Costs (please indicate the currency)	Source of information (if available)	Level of the information (WWTP, municipal, regional, national)
Capital expenditure (e.g. building infrastructure for			,
collection and treatment plants)			
Maintenance cost of infrastructure (e.g. renewal of			
infrastructures)			
Operating costs (e.g. personnel)			
Administrative costs (e.g. keeping records, reporting to			
competent authorities)			
Costs of monitoring, reporting performance / compliance			
to Member State authorities			
Costs of enforcing the requirements of the law (e.g.			
inspection, reporting to the European Commission)			
Costs for providing information to the public			

If you have other information on costs or general comments, please do not hesitate to contact us via ENV-URBAN-WASTE-WATER@ec.europa.eu or fill in the box:	
1500 character(s) maximum	

Please rate the following scale of (indirect) benefits from the implementation of the Directive:

	0 – adverse impact	1 – no benefit	2 – Little benefit	3 – Some benefit	4 - important benefit	5 – very important benefit	I do not know
Overall reduction of emissions of organic pollution to the groundwater	0	•	0	0	©	0	0
Overall reduction of emissions of organic pollution to surface water	0	0	•	0	0	0	0
Reduction of nutrients causing eutrophication	0	0	0	•	0	0	0
Reduced emissions of industrial pollution to water bodies	0	0	0	•	0	0	0
Reduction of microbiological pollution	0	0	0	•	0	0	0
Reduction of public health problems (e.g. incidents of illness)	0	•	0	0	0	0	0
Improvements in water status (good chemical status)	0	0	•	0	0	0	0
Improvements in water status (good ecological status)	0	0	•	0	0	0	0
Improvements in water status (good ecological status)	0	0	•	0	0	0	0
Improvements in biodiversity in receiving waters	0	0	•	0	0	0	0
Improved knowledge and subsequent remedial actions from monitoring and reporting	0	0	•	0	0	0	0
Improved public information on the national approach to urban waste water	0	0	•	0	0	0	0
Improvement of the recreational values of recipient waters (e.g. fishing opportunities, clean bathing waters)	0	0	•	0	0	0	0
Contributing to functioning ecosystem services (e.g. provisioning of clean water, supporting nutrient cycles, recreational benefits)	0	0	•	0	0	0	0

Improved availability and quality of treated water for water reuse purposes	0	•	0	0	0	0	0
Improved availability of nutrients through re-cycling of sludge	0	0	•	0	0	0	0
Improved public sanitation and quality of life	0	0	•	0	0	0	0
Improved economic growth and creation of jobs	0	0	•	0	0	0	0
Other benefits	0	0	0	0	0	0	0

To what extent do you agree with the following statements on the justification of costs and benefits of this Directive requiring, amongst others, collection systems and adequate treatment?

	Strongly agree	Agree	Neither agree nor disagree	Disagree	Strongly disagree	l do not know
The costs involved in relation to the Directive are justified given the benefits that have already been achieved	•	•	•	•	•	•
The costs involved in relation to the Directive are justified given the benefits that will be achieved in the short term	0	•	•	•	©	0
The costs involved in relation to the Directive are justified given the benefits that will be achieved in the long term	©	•	•	•	©	•
When considering the administrative cost, the costs are justified compared to the benefits achieved	©	•	•	•	©	0
Further simplification of the law is possible (e.g. reducing treatment requirements and consequently costs, or monitoring and reporting requirements)	©	•	•	•	©	•
Further optimisation of the law is possible (i.e. gaining additional benefits from a similar level of costs for example by including some pollutants that could be removed at the same time than those specified in the law)	•	•	•	•	©	©
Stronger links could be made with technical progress and innovation (e.g. requiring continuous	•	©	•	0	•	0

improvement of environmental performance reflecting technological progress)						
The costs arising from the UWWTD, including renewal of infrastructure costs, have decreased over time	•	•	•	•	•	•
The benefits from the UWWTD have increased over time	0	0	•	0	0	0

If you would like to provide further information on one of the statements above, please do so here:

1500 character(s) maximum

In Finland first wastewater treatment plants were built in 1910. In 1970 and 1980 wastewater treatment plants and sewage network was built in all cities and municipalities. Requirements for BOD and P-removal were nationally more strict than requirements in the UWWTD. Thus impacts on the directive are not generally considered to very important from national perspective. However, for the Baltic Sea region it has been important that all countries are implementing the directive.

Have the observed results been achieved in an efficient manner?

	Yes	No	l do not know
Results for collecting urban waste water	•	0	0
Results for treating urban waste water to a sufficient level	•	0	0
Results for complying with the threshold values	•	0	0

If the results have been achieved efficiently, do you have examples of efficient implementation of the UWWTD?

1	1500 character(s) maximum	

Are you aware of any problems relating to the financing and management of investments for the implementation of the Directive (e.g. building of sewerage collection systems or treatment plans)?

- Yes
- O No
- I do not know

In your Member State/ region/ municipality, are you aware of other type of funding / loan (e.g. funding from international institutions) available to support the implementation of the Directive?

	Yes, funding was available	No, I am not aware of any funding	Not applicable
Member State / national level	0	•	0
Regional level	0	•	0
Municipal level	0	•	0

Are the costs of complying with the Directive affecting the affordability of water services?
Yes
O No
O I do not know
If yes, how?
1500 character(s) maximum
Relevance
The analysis on relevance focuses on whether the needs and the objectives of the Directive are aligned. That is to say, whether the specifications of the UWWTD are still relevant today in achieving its objectives of protection of the environment from the adverse effects of waste water discharges.
Are you aware of any problems/issues related to urban waste waters including their impact on the environment that the Directive does not address?
Yes
O No
O I do not know
If yes, please specify:

UWWWTD does not address issues like micropollutants or energy efficiency for example. Affordability of services, to keep the water environment clean and to safeguard water resources for human health, requires that the polluter pays principle be clarified in many cases and the extended producer responsibility be incorporated. Industries should develop responsible solutions to reduce harmful impact of their products on the environment and waste water assets. We consider that control at source is the most sustainable way to avoid the release of pollutants.

1500 character(s) maximum

	To a large extent	To some extent	To no extent	l do n knov
Biological oxygen demand (BOD5) is still valid as a parameter	•	0	0	0
The limit value for BOD5 is still accurate	•	0	0	0
Chemical oxygen demand (COD) is still valid as a parameter	•	0	0	0
The limit value for COD is still accurate	•	0	0	0
Total suspended solids (TSS) is still valid as a parameter	0	0	•	0
The limit value for TSS is still accurate	•	0	0	0
Nitrogen is still valid as a parameter	•	0	0	0
The limit value for nitrogen is still accurate	•	0	0	0
Phosphorus is still valid as a parameter	•	0	0	0
The limit value for phosphorus is still accurate	©	0	0	0

Do you think the Directive is sufficiently flexible to be integrated with urban planning policies?

Urban planning policies and sustainable storm water management are developing by other drivers than

How relevant are the provisions of the Directive to the management of urban waste water in

YesNo

I do not know

If no, please specify:

UWWTD.

1500 character(s) maximum

To a large extentTo some extentTo no extent

dispersed population or small rural communities?

To what extent do you agree with the following statements?

	To a large extent	To some extent	To no extent	I do not know
The end of pipe approach for the collection and treatment of urban waste waters is still appropriate.	•	0	0	0
The objectives of the Directive addresses environmental protection as well as human health.	0	•	0	0
The analytical methods set out in the directive are still appropriate.	0	•	0	0
The monitoring requirements of the Directive are adequate.	•	0	0	0
The provisions related to IAS are still appropriate.	0	•	0	0
The provisions related to information to the public are sufficient and transparency is ensured.	0	•	0	0
The provisions related to reporting to the European Commission are clear.	0	•	0	0
The biennial report by the European Commission on the implementation of the directive is useful, even if reported data are published 2-3 years later.	0	•	0	0
There are no gaps in the scope of the UWWTD (e.g. pollutants, thresholds).	0	•	0	0
There are no obsolete / unnecessary provisions in the UWWTD.	0	•	0	0
The UWWTD promotes research and development.	0	•	0	0
The UWWTD encourages innovation and adaptation the uptake of the best available techniques.	0	•	0	0
The UWWTD allows for new / emerging pollutants to be considered.	0	•	0	0
The UWWTD efficiently promotes the re-use of sludge.	0	0	•	0
The UWWTD allows for effective management of sludge.	0	•	0	0
The UWWTD is compatible with the application of the circular economy principles (reduce, re-use, recycle) in the EU. (http://ec.europa.eu/environment/circular-economy/index_en.htm)	0	•	0	0

The UWWTD promotes the uptake of an integrated approach to the management of water quality and quantity.	©	0	•	0
The UWWTD promotes the uptake of nature-based solutions (e.g. green roofs, riparian buffer strips).	©	0	•	0
The UWWTD is compatible with the commitment to achieving the Sustainable Development Goals by 2030.	0	•	0	0
The UWWTD promotes sustainable approaches such as phosphorus and nitrogen recycling.	0	0	•	0
The UWWTD promotes safe waste water reuse.	0	•	0	0
The UWWTD allows the possibility to deal with storm water overflows in an efficient manner.	0	•	0	0

nt at which the UWWTD is coherent and articulated ntions.
ntions.
ntions.
ments within the UWWTD coherent with each other

To what extent is the UWWTD coherent with the following EU water law?

Please add comments to explain your responses in the 'comment' section below.

	To a large extent	To some extent	To no extent	I do not know

Water Framework Directive	0	•	0	0
Groundwater Directive	0	0	•	0
Environmental Quality Standards Directive	0	0	•	0
Floods Directive	0	0	•	0
Bathing Water Directive	0	•	0	0
Drinking Water Directive	0	•	0	0
Nitrates Directive	0	0	•	0
Sewage Sludge Directive	0	•	0	0
Marine Strategy Framework Directive	0	•	0	0
Industrial Emissions Directive	0	0	•	0
European Pollutant Release and Transfer Register	0	0	•	0
Other (please comment below)	0	0	•	0

If you would like to comment on any of the above, please do so here:

1500 character(s) maximum

Sewage sludge is a by-product of waste water treatment. Current EU legislation does not support utilization of sewage sludge since Sewage Sludge Directive is outdated. Sustainable utilization of sewage sludge should be encouraged. EU Comission should organize research related to the sewage sludge to take care that solid scientific information could be used as a basis for the utilization of sewage sludge.

To what extent is the UWWTD coherent with the following EU environmental policies?

Please add comments to explain your responses in the 'comment' section below.

	To a large extent	To some extent	To no extent	l do not know
Birds and Habitats Directives	0	•	0	0
Pesticides Framework Directive	0	0	•	0
Circular economy strategy	0	•	0	0
(http://ec.europa.eu/environment/circular-economy/index_en.htm)	0	0	0	0
Policies on endocrine disruptors	0	0	•	0
Environmental Impact Assessment Directive	0	•	0	0
Strategic Environmental Assessment Directive	0	•	0	0
Sustainable development goals	0	•	0	0
Energy Efficiency policies	0	0	•	0
Greenhouse Gas emissions reduction policies	0	0	•	0
Climate change adaptation policies	0	©	•	0
Other (please comment below)	0	0	0	0

-	500 character(s) maximum	ie above, pie	ase uo so ne			
ΞU	added value					
tha	e aim of the questions is to gain an under at the law is at EU level compared to law stified.	_				
cou	at is the additional value from adopting all the achieved at national/regional levels and comments to explain your responses in the 'co	vel?		U level as op	posed to wh	at
		High additional value	Some additional value	Little additional value	No additional value	l do not know
	Better waste water treatment	0	•	0	0	0
	Ensuring the delivery of improved collection and/or treatment of waste water	0	•	0	0	0
	Cleaner rivers, lakes, and seas	0	•	0	0	0
	Harmonisation of approaches	0	•	0	0	0
	Easier to access financing	0	•	0	0	0
	Enhanced comparability collection and treatment levels across Member States	0	•	0	0	0
	Faster implementation due to risk of financial sanctions at EU level	0	•	0	0	0
	Facilitating the compliance of other EU environmental Directives and policies	0	•	0	0	0

If you would like to comment on any of the above, please do so here:

Other (please comment below)

1500 0	character(s) maximum			

To what extent do the issues addressed by the UWWTD continue to require law at EU level? To a large extent To some extent To no extent I do not know
What would be the most likely consequences of stopping or withdrawing the existing UWWTD? Negative impacts No impacts Positive impacts
I do not know If you wish to explain your response, please do so here: 1500 character(s) maximum
UWWTD has been fully implemented in Finland and thus withdrawing the existing UWWTD would not have impact. Most likely high level of environmental protection would be ensured trough national legislation and implementation of the WFD
Final questions
If you wish to expand on any of your answers or if you wish to add comments or information on anything else, which is relevant to the collection and treatment of waste water in Europe, please do so here: 1500 character(s) maximum
If you consider there are materials / publications available online that should be considered by us in this evaluation exercise please feel free to describe them (title and author) in the box and include any relevant links: 1500 character(s) maximum

Contact

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