

INCOPA welcomes the revision of the Urban Waste Water Treatment Directive

INCOPA, the European association for inorganic coagulant producers, welcomes the outlined priorities of the revision of the UWWTD. Our members manufacture inorganic coagulants, aluminum and iron salts, which are used to purify drinking water, treat wastewater and create vital industrial products. INCOPA is a Cefic sector group.

The current directive has proven to be a good tool to manage and improve the quality of wastewater discharges, but we welcome the European Commission's decision to review the directive and we believe that the new UWWTD should focus on following issues:

- **Environmental aspects:** There is still the need of addressing eutrophication caused by phosphorus discharges throughout the EU. We would encourage the Commission to carefully study the possibility to tighten phosphorus discharge limits from wastewater. We also welcome the identification of storm overflows as a major cause of pollution/eutrophication and the need to better address this kind of pollution.
- **Implementation of further treatment (substances of emerging concern, micro pollutants, micro plastics):** micro pollutants like pharmaceuticals, micro plastics or multi-resistant pathogens pose a threat to our environment and ourselves. Some member states have already started with measures that can contribute to a remedy of these problems. We are encouraging the Commission to take appropriate action in places where it seems necessary and appropriate.
- **Circular economy (recovery of nutrients and other substances):** Regardless of a possible shortage of raw material supply, sewage sludge, but also wastewater in general should be considered as a possible resource for the future. Sewage treatment plants are therefore an important element of the circular economy. With the sewage sludge directive, important steps have already been taken into this direction. INCOPA supports the efforts to recover valuable substances such as phosphorus and others from wastewater and sewage sludge. Coagulants, which are themselves already part of the circular economy, play an important role in achieving the goals.

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- Energy consumption of wastewater treatment: Modern wastewater treatment has a significant contribution to the total energy demand. As this also represents a significant cost factor for the sewage treatment plants, measures have already been taken in many countries to optimize the energy demand or to recover the required energy out of the treatment process. Wastewater treatment plants have a potential for reducing greenhouse gas emissions (e.g. by optimizing the process or through the extraction of biogas from the wastewater) and can thus make an important contribution to climate protection. Also, the members of INCOPA try to make a contribution with their products and their experience. As a recent LCA (Life Cycle Assessment) study indicate the use of coagulants is an essential step to reduce greenhouse gas emissions and optimize the energy balance of the sewage treatment plants.

INCOPA looks forward to supporting the Commission in the UWWTD revision process.

While contributing to this consultation we remain very aware we are all still experiencing unprecedented times. As Cefic, we aim to maintain a high standard in our responses. Europe's industries will have to cope with the impacts of this crisis while ensuring investments support a climate-neutral Europe. We therefore look to the European Institutions to undertake the appropriate assessments and set a framework ensuring the EU's post-crisis attractiveness as an investment destination while achieving EU Green Deal objectives.

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About INCOPA
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