

Our work in 2022

2022 saw a welcome return to a more usual life after the COVID-19 pandemic of 2020-21. It was not without its challenges, however. The Russian invasion of Ukraine in February set off a chain of reactions that reverberated throughout the year, invoking energy-reduction and energy-efficiency measures to deal with the fallout. Also linked to it were supply chain disruptions, which impacted the delivery of essential chemicals, necessaryin water treatment processes.

Water and energy are intrinsically linked. Delivering water services to 500 million people involves high energy use. However, we can also provide Europe with sustainable energy.

We support the objectives of the Renewable Energy and Energy Efficiency Directives, as a means to achieving energy and climate neutrality, as part of the European Green Deal. The European Green Deal is a package of policy initiatives, which aims to set the EU on the path to a green transition, with the ultimate goal of reaching climate neutrality by 2050.

Returning treated wastewater safely to the environment is a priority for us all across our sector, despite increasing amounts of pollutants in the influent that enters wastewater treatment plants (WWTP). Moreover, WWTP should be enabled to realise their full renewable energy potential with a view to moving towards EU targets proposed under the UWWTD.



Any EU policy on this must offer a supportive legislative framework and remove barriers to energy generation and injection in the grid. We have to take advantage of the UWWTP review to tap into this potential to reach our climate, energy and Circular Economy goals.

Key to meeting our energy and reuse goals is reducing or even preventing contaminants from entering our water cycle in the first place, as this is the best way to reduce our energy use for water treatment and maximise the reusability of the by-products that come from our water. We continue to promote control-at-source measures to be included in EU legislation from the Industrial Emissions Directive, Urban Waste Water Treatment Directive, Water Framework Directive, the Environmental Quality Standards Directive, the Groundwater Directive and the Sustainable Use of Plant Protection Products Regulation and fully support the objectives of the Zero Pollution Action Plan.

If it is not possible to prevent contaminants from entering the water cycle, we believe that the producers responsible for them should be held financially accountable for additional treatment measures needed to keep the aquatic environment at its original state, not the consumer. We have a chance now with the UWWTD recast to implement EPR in line with the EU treaties.

We also need upstream legislation that is robust enough to deal with chemicals that may end up in the environment due to their intrinsic properties, such as the Classification, Labelling and Packaging (CLP) and REACH Regulations. We are happy to see new hazard classes for substances with endocrine-disrupting properties and substances which are persistent, mobile, bioaccumulative and toxic under the CLP. This is a real milestone in the authorisation of chemicals and will cover the whole range of chemicals-related legislation (pesticides, biocides etc).

In a similar vein, we want pesticides to be used sustainably, with a Sustainable Use of Plant Protection Products (SUR) Regulation. Therefore, we support the Commission's proposal to prohibit the application of pesticides in sensitive areas like drinking water catchment areas.

The 2020 Drinking Water Directive continued to be implemented across Europe, further ensuring safe and healthy tap water for consumers. We are proud that European tap water is among the best in the world, assuring consumers' trust.

One thing that will never change for your European water service providers is our drive to provide the best possible affordable water services to all people across Europe. We work tirelessly with the EU institutions and beyond to make robust environmental legislation that ensures this goal.

EurEau brings together 180 of Europe's premier water experts to share knowledge and experience of water issues in their country and locality. Their input is invaluable to establishing our common positions on issues facing the sector. To each of you, I thank you for your generosity in sharing your time and expertise. EurEau's achievements in promoting and building a robust experience-based framework for water services are only feasible thanks to your input.

Oliver and his team are our rocks amongst the waves of EU policy. They have mastered the art of setting priorities, looking at what is really important for water services and doing an unbelievably large amount of work that we all only have a partial overview of. My deep respect and sincere thanks for the extraordinary achievements of all the secretariat over the last years.

DR CLAUDIA CASTELL-EXNER

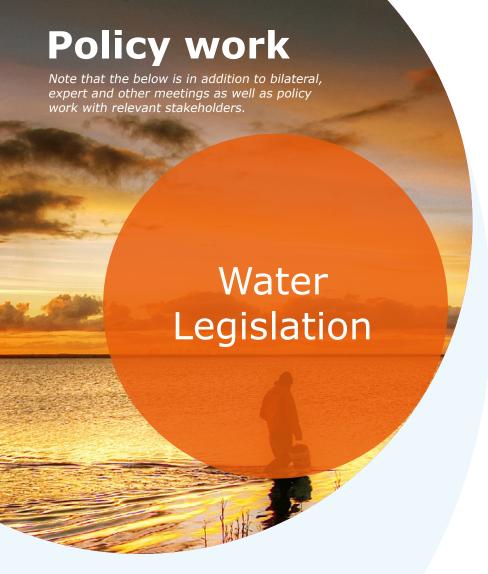
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EurEau President



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Member States are required to protect and improve water quality in all waters 99

The Water Framework Directive, the Groundwater Directive and the Environmental Quality Standards Directive

Member States are required to protect and improve water quality in all waters and achieve good status by 2027 under the Water Framework Directive (WFD).

The Environmental Quality Standards Directive (EQSD) identifies 'priority substances', for which standards have to be fulfilled in surface waters and whose emissions have to be reduced or (in the case of priority hazardous substances) phased out. The Groundwater Directive (GWD) sets standards for pesticides, pharmaceuticals, PFAS and nitrates in groundwater, and identifies other substances for Member States to consider setting thresholds.

The pollutants lists for surface and groundwater are being revised and the Commission adopted a legislative proposal in 2022.

What we want

Water resources need to be protected and the objectives of the Water Framework Directive and its 'daughter directives' should be mainstreamed in various sectoral legislation. We want the pollutants lists to be based on solid data and trigger control-at-source measures to ensure compliance.

The implementation of the WFD is a prerequisite to the availability of appropriate water resources to deliver clean and safe drinking water, whereas adequately treated wastewater is one of the conditions for WFD compliance.

We want an EQSD that enables the provision of safe and affordable drinking water services to consumers. It is also an effective means of protecting the environment.

We urge the European Commission to better protect groundwater used, or suitable to be used for drinking water abstraction, from adverse impacts. Efficient and effective legislation and environmental awareness are needed to prevent deterioration and improve the resource quality of groundwater, where needed.

What we did

Working closely with the European Commission, we contributed to the preparatory work from the beginning and submitted comments on the background document on the EQSD and the Groundwater Directive.

The WFD/EQSD/Groundwater Directive List of Pollutants legislative proposal came in October. We developed our position paper and amendments, published in early 2023.





One thing we are very concerned over is the determination of leakage levels 99

Drinking Water Directive

The EU's Drinking Water Directive (DWD) addresses and improves the quality of drinking water for consumers.

The adopted legislation will enable European water services to continue providing safe and affordable drinking water to consumers although the impacts of some elements have still to be clarified at EU or national levels.

What do we want



Our drinking water should remain of high quality while being affordable for everyone.

wnat we did

The implementation phase of the Drinking Water Directive began in January 2023. Member States have two years to transpose it. We are monitoring the national implementation process and the costs of these with our members.

Heavily linked to the quality and affordability of our drinking water are PFAS (see page 17 and microplastics (see page 15).

One thing we are very concerned over is the determination of leakage levels.

The Watch List under the DWD was published in January 2022. Water operators support the idea of the watch list in the DWD as a way to investigate contaminants of emerging concern in water resources/raw water and inform the Risk-Based Approach where they are likely to be present in water intended for human consumption and could pose a potential risk to human health.

We proposed two experts - Eelco Pieke (Vewin, The Netherlands) and Miquel Paraira (AEAS, Spain) - for the European Commission's work in monitoring microplastics in drinking water. We participated in the development of an analytical method for microplastics which is being developed by the JRC.

Drinking water supply and leakage management

PFAS and drinking water

The Drinking Water Directive Explanatory Memorandum on the Drinking Water Directive

The DWD final agreement (internal)

The impact of drought on drinking water

POSITION PAPERSAND BRIEFING NOTES



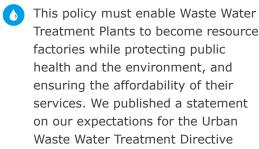


Legislation will enable
European water services
to continue providing
safe and affordable
drinking water 99

Urban Waste Water Treatment Directive

The Directive concerns the collection, treatment and discharge of urban waste water from domestic and certain non-domestic sources.

What do we want



(UWWTD). You can read it here.

What we did

With the Commission's proposal for a new UWWTD imminent, our committees met many times to outline what we wanted to see included in this. We saw the revision as an opportunity to develop an ambitious, innovative, supportive and straightforward new policy framework enabling operators to meet the Green Deal goals and make waste water collection, treatment and management fit for the decades to come.

You can read more about the Directive here.

The Commission's draft was published in October. We gave it a cautious welcome. It opens the door to better protection of human health and the environment and encourages the wastewater sector to be energy neutral.

We are pleased to see the inclusion of control-at-source but the proposal doesn't go far enough in realising Extended Producer Responsibility schemes to address quaternary treatment for micropollutants.

Delivering the challenge put to us by the Commission will require financing of the necessary upgrades to our infrastructure over the next 30 years and the will to coordinate resources to deliver the directive's ambitions.

You can read our full press release here.

Nutrients and waste water management

Integrated **Waste Water** Management Plans

Small agglomerations in the UWWTD

The Weser Ruling and its effects on UWWTP

Individual and other Appropriate
Systems (IAS)

The management of waste water and storm water networks

What is a sewer network Reducing the energy footprint of the water sector

The Urban **Wastewater Treatment Directive**

Overflows from collecting systems

Environmental Quality Standards for **Pharmaceuticals**

POSITION PAPERS AND BRIEFING NOTES





Reusing and recycling are key to protecting the environment 99

Water and the Circular Economy

Reusing and recycling are key to protecting the environment and ensuring that future generations have a safe and healthy future.

The circular economy aims to maintain the value of products, materials and resources for as long as possible by returning them into the product cycle at the end of their use while minimising the generation of waste.

The European Commission's Circular Economy Action Plan proposes a more sustainable approach to chemical substances, plastics, and textiles, ensuring the functioning of the market for secondary raw materials and improving synergies to mitigate climate change, all of which are concerns for the water sector. The upcoming Nutrient Management Action Plan is linked to this too.

Waste water treatment plants can produce many secondary materials that can be recovered to achieve this.

What do we want

Clear standards for the reuse of recovered materials will ensure that these are safe to be recycled in the environment, promoting sustainability and responsibility along the whole chain of users, independent of their origin. One part of this is the Water Reuse Regulation, which sets out minimum water quality and monitoring requirements to ensure safe water reuse, as well as risk management requirements, to assess and address additional health and environmental risks.

What we did

We input to the Commission's guidelines to help Member States and stakeholders apply the rules on the safe reuse of treated urban waste water for agricultural irrigation and on the guidelines on managed aquifer recharges.

We contributed to the communication on ensuring the availability of fertilisers.

We submitted our feedback to the call for evidence on the Waste Framework Directive, end-of-waste criteria for waste from wastewater streams. Regrettably, no material from wastewater treatment streams was selected.

POSITION PAPERSAND BRIEFING NOTES





Water service providers have a significant renewable energy generation potential 99

Energy

Fit-for-55; the Energy Directives

The new Renewable Energy Directive (RED) proposes rules for the EU to achieve a - currently 32% - renewables target by 2030 while the Energy Efficiency Directive (EED) calls for energy savings and energy efficiency.

The European Parliament adopted an accelerated permitting system for renewables called 'go to areas' that included WWTPs.

The EU Emissions Trading Scheme (ETS) is a cornerstone of the EU's policy to combat climate change and its key tool for reducing greenhouse gas emissions cost-effectively.

REPower EU set an ambitious target on biomethane to substitute Russian gas. Biogas produced at urban waste water treatment plants can be upgraded into bio-methane and should play a role in the substitution of fossil gases with renewable alternatives. It is regulated by the Regulation on the Internal Markets for Renewable and Natural Gases and for Hydrogen.

What we want

b EurEau supports the general objective of the EED and the RED as a means to achieving energy and climate neutrality. Water service providers have a significant renewable energy generation potential. Policy must offer a supportive legislative framework and remove barriers to its generation and injection in the grid.

The EED is not adapted to the water sector. We see the UWWTD, which is under revision, as the legislative tool to bring the water sector towards climate neutrality. We are in favour of energy audits but together with climate audits.

As a fixed energy-saving target is not feasible in the water sector, we see the UWWTD as the best place to address energy efficiency and GHG emissions targets. For the ETS, we believe that emissions from sewage sludge incineration of sewage sludge or co-incineration with municipal waste are of biogenic origin and should not be covered by the ETS.

Regarding the RED, we want guaranteed access for bio-methane to the gas networks, a sound renewable certification system (Guarantee of Origin) and gas quality standardisation.

In addition, UWWTP has to be connected to the hydrogen economy, should suitable technologies become available.

POSITION PAPERSAND BRIEFING NOTES

What we did

The Commission published REPowerEU in March. Our reaction is here. Some of the €3billion allocated to energy savings actions will be diverted to hydrogen research projects.

The ETS includes municipal waste incineration installations. We worked with MEPs to ensure that whenever sewage sludge is managed together with municipal waste, sludge will not be covered by the ETS. Sewage sludge is not considered municipal waste by the Waste Framework Directive and sewage sludge mono-incineration is therefore not included in the ETS.

Draft revised Energy Efficiency Directive Draft revised Renewable Energy Directive (REDIII)







The water sector is keen to transform UWWTP into resource factories 99

Plastics and the Environment

Textiles and Microplastics

Microplastics are solid plastic particles composed of mixtures of polymers and functional additives.

They may also contain residual impurities. Microplastics can be unintentionally formed when larger pieces of plastic, like car tyres or synthetic textiles, wear and tear. But they are also deliberately manufactured and added to products for specific purposes, such as exfoliating beads in facial or body scrubs. Microplastics released from textiles can make their way into wastewater treatment infrastructure and later into the environment. Control-atsource measures to prevent microplastics from entering the cycle are both sustainable and effective and are key for delivering the circular economy.

What we want

The water sector is keen to transform urban wastewater treatment plants (UWWTP) into resource factories. This can only be achieved when hazardous substances and microplastics are avoided at the sources and, hence, do not arrive at the treatment plant. We call for strong measures to mitigate microplastic emissions at the source. While WWTPs remove almost all microplastics from wastewater, a significant part are transferred to the sludge, limiting circular economy options. If downstream measures become unavoidable. EPR schemes must cover the cost of these.

What we did

We reacted to the European Commission's Strategy for Sustainable and Circular Textiles. If implemented, it may reduce the pollutants load in wastewater through the phasing out of hazardous chemicals and measures to limit microfibre release. Read our comments on the Strategy here.

The European Commission published a framework for bio-based, biodegradable and compostable plastics by providing definitions, test methods and assessing applications that lead to genuine environmental benefits. Consumers should be offered clear and trustworthy options.

We answered the call for evidence and the public consultation.

We are also awaiting the Commission's proposal for a regulation on unintentionally released microplastics, potentially addressing labelling,

POSITION PAPERSAND BRIEFING NOTES

standardisation, certification and regulatory measures for the main sources of these. We welcome the possible inclusion of Extended Producer Responsibility schemes and the focus on control-at-source measures.

We continue our work in the Tyre and Roadwear Particles Platform.

The Commission presented a draft regulation adding a restriction of intentionally added microplastics to Annex XVII of REACH. While we welcome this Commission action, numerous loopholes and long transition periods will mean that microplastics will continue to be released for years to come.

Deloitte Study on the

Feasibility of Applying

Extended Producer Responsibility to

Micropollutants and Microplastics Emitted in the Aquatic Environment From Products During Their Life Cycle The Impact of Certain Plastic Products on the Environment





All uses of PFAS should be phased out rapidly 99

Micropollutants, hazardous substances and industrial emissions

PFAS, the Classification, Labelling and Packaging of Chemicals Regulation, REACH and the Safe and Sustainable by Design Framework

The Classification, Labelling and Packaging (CLP) Regulation's purpose is to ensure a high level of protection, as well as the free movement of substances, mixtures and articles in the EU.

The current revision aims to position the CLP as the overarching instrument for EU chemical legislation through the establishment of certain hazard classes and the criteria to assess these hazardous properties, together with the 'One Substance-One Assessment' Principle.

The Registration, Evaluation,
Authorisation and Restriction of
Chemicals (REACH) Regulation
addresses the production and use of
chemical substances, and their potential
impacts on both human health and the
environment.

The 'safe and sustainable by design' (SSbD) framework encourages innovation to replace hazardous substances in products and processes.

It is part of the Chemicals Strategy for Sustainability and is voluntary.

What we want

- We want micropollutants in the environment to be dealt with holistically by all stakeholders involved along a product's entire life cycle starting from strong precautionary and control-at-source measures.
- Given their persistence, all uses of PFAS should be phased out rapidly. The REACH restriction initiated by five European countries must lead to zero PFAS emissions into the environment.

What we did

The legislative proposal for the CLP Regulation came in autumn. It is a great step forward although we would have liked to see a more ambitious proposal, since the proposed mobility criteria do not cover all relevant substances for drinking water supply.

The proposal – through the Implementing Act - introduces new hazard classes and criteria in Annex I, i.e. PBT (persistent, bioaccumulative and toxic), vPvB (very persistent and very bioaccumulative), endocrine disruptors and, very important for the protection of the water resources, PMT (persistent, mobile and toxic) and vPvM (very persistent and very mobile), something we strongly support. Our statement is here.

This is the first step in restricting the use of certain substances and therefore better protecting our health and water resources.

POSITION PAPERSAND BRIEFING NOTES

In relation to REACH, we strongly advocate in favour of stronger control-at-source measures, including for persistent, mobile and toxic substances.

We regret that the Commission postponed the revision of the REACH Regulation to 2023.

It was also a busy year for PFAS. We published our position paper on PFAS in the water cycle and a briefing note on PFAS, biosolids and the circular economy. You can read them here and here.

We advocate in favour of a full ban of these 'forever chemicals', including in firefighting foams, to protect public health and the environment. PFAS, biosolids and the circular economy

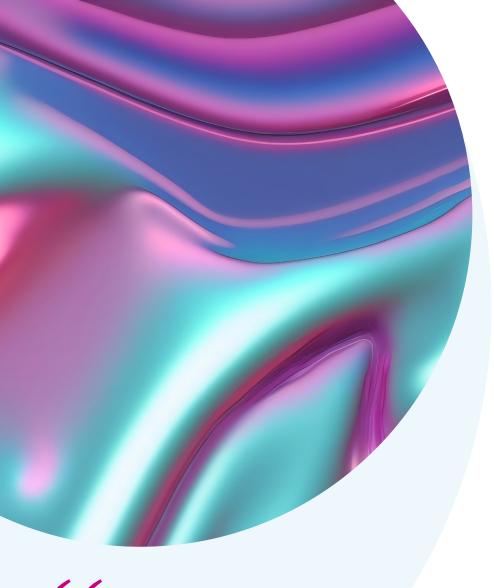
PFAS in the urban water cycle (2022 update)

Drinking water and PFAS

Wastewater

Treating micropollutants at the waste water treatment plant The holistic approach to addressing micropollutants - 2019 update of source control

Moving forward on PMT and vPvM substances



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An amalgam ban will facilitate a truly Circular Economy 99

Restriction of Hazardous Substances Directive and the Mercury Regulation

The Restriction of Hazardous Substances (RoHS) Directive regulates the use of specific hazardous materials found in electrical and electronic products (known as EEE), to better protect public health and the environment. All applicable products in the EU market must pass RoHS compliance.

What we want



What we did

Even though the RoHS revision is postponed, we have sent relevant background information to the Commission.

We submitted a technical document to the Commission assessing that UV lamps are part of water treatment works or wastewater treatment, and should be classified as 'large scale fixed installations', and therefore excluded from the scope of the Directive.

We were disappointed to learn that the Commission postponed the revision of the Mercury Regulation and we co-signed a letter with some leading environmental organisations to encourage the Commission to revise this legislation during the current mandate. We are in favour of a ban on dental amalgam so that, in the future, the levels of mercury in sludge from wastewater treatment will reduce and it will be possible to reuse the resultant high-quality sludge as a source of nutrients in a truly circular economy.



Aims to achieve a high level of protection of human health and the environment 99

Industrial Emissions Directive and the Industrial Emission Portal Regulation (IEPR)

The Industrial Emissions Directive (IED) aims to achieve a high level of protection of human health and the environment by reducing harmful industrial emissions, in particular through the better application of Best Available Techniques (BAT).

The Industrial Emissions Portal (IEP, formerly E-PRTR) set up under the IEPR, provides easily accessible key environmental data from industrial facilities in EU Member States. It also covers Iceland, Liechtenstein, Norway, Serbia, Switzerland, and the UK.

What do we want

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Reducing the release of potentially harmful contaminants into the environment benefits everyone.

Drinking water and wastewater plant operators need more complete information about what is in the industrial water released into sewers and surface water bodies. Our members should also have a say in the permit process.

Using the Control-at-Source and Polluter Pays Principles will protect us and the environment for years to come.

What we did

We saw a lot of proposed improvements to control industrial emissions to water sources as well as better access for water operators to information in the draft revised IED proposal. However, we also see some key issues that could pose a threat to protecting these same water sources. We published a position paper to clarify our concerns for policymakers. We support major parts of it but call for more clarity regarding 'off-site transfer' management. Easy access to data is paramount to facilitate the risk management of drinking and wastewater operators. You can read more here.

Best Available Technique Reference **Documents** (BREFs) **Industrial** discharge into sewers The holistic approach to addressing micropollutants 2019 update of source control **Industrial Emissions Directive**

We saw a lot of proposed improvements to control industrial emissions to water sources ??

Industrial Emissions Directive Portal

POSITION PAPERSAND BRIEFING NOTES



Healthy soils promote healthy water 99

Soil

Soil Health Law

The degradation of topsoils poses enormous threats to biodiversity, agriculture, human health and the climate.

The European Commission has announced it will propose a Soil Health Law in June 2023 to significantly improve the state of soils by 2050 and to protect soils on the same legal basis as air and water.

The EU's 2030 Biodiversity Strategy sets out how the EU can achieve the climate change mitigation needed by 2030. It will propose legally binding nature restoration targets, subject to an impact assessment.

Linked to the Biodiversity Strategy is the Soil Strategy, which addresses soil degradation and preserves land resources.

What we want

We support this initiative and want sewage sludge to be recognised as a soil improver. We responded to the public consultation and to the roadmap. We welcomed the European Parliament's resolution to increase the protection of Europe's soils. Healthy soils promote healthy water. Much of the runoff into our waterways and groundwater sources is filtered through soil and it forms an effective protective barrier to potential contamination. Better protection of our soils means the better protection of the quality and quantity of groundwater resources while strengthening the circularity of reclaimed water and nutrients recovered from wastewater.

What we did

We submitted our reaction to the Commission's public consultation on the EU soil health law.

Arjen Frentz (Vewin, NL) will represent EurEau at the enlarged Soil Expert Group set up by the Commission to accompany the implementation of Europe's Soil Health Strategy.

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Better protection of our soils means the better protection of the quality and quantity of groundwater resources 99

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Pharmaceuticals

Post 2027 Scenario – Realising the WFD

Customers and Cost recovery - realising the WFDP

The Need for Greater Policy Coordination – Realising the WFD

The Weser Ruling and its effects on UWWTP



EU-wide targets to reduce the use and risk of chemical pesticides by 50% by 2030.99

Statistics on Agricultural Input and Output and the Sustainable Use of Plant Protection Products (SUR) Regulation

The SAIO Regulation defines the data collection requirements for pesticides and fertilisers, Access to such data will significantly facilitate risk management under the drinking water safety plans.

It is vital that we all have enough food and at a fair price. The same is true for water. Sustainably using pesticides is therefore vital, as these can enter the water system through soil. EU rules on the sustainable use of pesticides aim to protect human health and the environment from the possible risks and impacts of pesticides.

The SUR – as proposed by the Commission - would introduce EU-wide targets to reduce the use and risk of chemical pesticides by 50% by 2030, in line with the EU's Farm to Fork and Biodiversity Strategies.

What we want

We want to see the better protection of drinking water resources and more coherence with the Drinking Water Directive and the Water Framework Directive.

We support an ambitious SAIO Regulation that ensures the availability and accessibility of pesticide and fertiliser use data, down to the plot level. On top of this, we want a SUR that delivers on the ground to reduce the use of pesticides, safeguard drinking water protection zones, and widen the use of integrated pest management. If measures at the level of drinking water production become necessary, Extended Producer Responsibility (EPR) should apply.

What we did

EurEau sent a statement to the SAIO Trilogue, supporting many of the Parliament's amendments, including the data collection frequency, the including of more input/output data, the dose applied, the area treated etc.

We co-signed a letter to the negotiating parties in support of an ambitious Regulation.

The Commission published its proposal for a new SUR Regulation in March. The proposal was a very positive step towards the implementation of the ambition of the Farm2Fork Strategy of the Green Deal, You can read our position here.

Preventing pesticide pollution will help achieve Zero Pollution while protecting people and the planet. Read our opinion piece here.

POSITION PAPERSAND BRIEFING NOTES

By the end of 2022, we could already see the significant distillation of the proposal, particularly in the definition of sensitive areas. We are working hard to counteract this, as we see this draft Regulation as an important tool to protect drinking water resources and keep water treatment costs under control. Weakening the Commission proposal would put the burden of public health protection on drinking water suppliers. We reacted to the Commission's 'non-paper' on sensitive areas.

We gave our strong support to the Implementing Regulation on the content and format of pesticide records as proposed by the Commission in late 2022.

On the draft
Sustainable
Use of Plant
Protection
Products
Regulation

The Revision of the Common Agricultural Policy

Water and Agriculture

Cooperation projects between farmers and the water sector

The Drinking Water Directive Explanatory Memorandum The DWD final agreement (internal)

Sustainable Use of Pesticides: Recommendations on the Review of Directive 2009/128/EC

Deloitte Study on the Feasibility of Applying Extended Producer Responsibility to Micropollutants and Microplastics Emitted in the Aquatic Environment From Products During Their Life Cycle

25



Water operators recognise the need to strengthen cyber security ??

Directive on Measures for a High Common Level of Cybersecurity Across the Union (NIS2) and the Critical Entities Resilience Directive (CERD)

With the Directive on Measures for a High Common Level of Cybersecurity Across the Union (NIS2) Directive, the EU will set a range of network and information security requirements which apply to operators of essential services, such as water operators, and digital service providers.

The Critical Entities Resilience Directive (CERD) will set requirements for critical entities, including water operators, to increase the resilience of the physical assets against man-made and natural disasters.

Both Directives were adopted in December 2022.

What we want

Water operators recognise the need to strengthen cyber security as a prerequisite to benefiting from the digitalisation of services. Our members are also committed to increasing their resilience to natural or man-made disasters. In both cases, European rules should be proportionate to the risks, take account of the size of operators and recognise equivalent national requirements.

What we did

We submitted recommendations for the trioglue between the European Parliament and the Council NIS2 Directive and the CER Directive. We emphasised the need to select the entities covered through a risk-based approach and ensure the proportionality of measures, particularly for small operators.

We are preparing background notes for our members to help them with the implementation process.

EurEau
Comments on
the Commission
proposal for the
revision of the
NIS Directive

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Water service providers have identified several areas requiring particular innovation efforts 99

Innovation is key to guaranteeing the affordability of safe, sustainable and resilient water services for decades to come. Water service providers are well aware of the challenges and have identified several technological and non-technological areas requiring particular innovation efforts with a view to meeting the goals of the European Green Deal.

What we want



We want innovation programmes to reflect the real concerns and challenges faced by water services.

What we did

We are involved in the advisory boards of several projects. See page 38 for more details.

We are engaged in the Water4All partnership as observing partners. We are a partner in a project proposal focusing on the innovation needs of water utilities and the need for a better knowledge transfer.

We provided detailed comments on the strategy of the Mission 'Restore our Ocean and Waters'. In response to calls from our members, we launched our Innovation Sharing Platform in October. See page 30 for more information.

POSITION PAPERSAND BRIEFING NOTES

The Precautionary and Innovation Principles

Innovation needs of the water sector



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We call for eco-design measures on the release of micropollutants and microplastics 9.9

Sustainable products initiative

The European Commission intends to revise the Eco-Design Directive as part of its sustainable products initiative. The goal is to make products more durable, reusable, repairable, recyclable, and energy-efficient. The initiative will also address the presence of harmful chemicals in products such as electronics & ICT equipment and textiles. In our reaction to the public consultation, we call for ecodesign measures on the release of micropollutants and microplastics and the application of the Polluter Pays Principle.

Critical Raw Materials

In the Critical Raw Materials Act, we submitted to the Call for Evidence and Public Consultation. We would like to see the scope of the act extended to all products used by critical entities like water services to ensure continuity of services. We support maintaining phosphorus on the Critical Raw Materials list and support the inclusion of other products. This initiative will reinforce EU monitoring capacities and strengthen both the EU value chain - through the identification of mineral resources and raw materials projects in the EU's strategic interest, with strong environmental protection - and EU external policies on CRMs.

Clean Oceans

We submitted a contribution to the public consultation on the Marine Strategy Framework Directive.

Environmental Liability Directive

As a number of water service-related activities are covered by direct liability, EurEau insists on the need to distinguish between polluters and pathways. We responded to the public consultation.

Concessions

We attended the Stakeholder meeting on the Concessions Directive held by the European Commission to discuss the functioning of the Directive and the impact of the water sector exclusion.

Taxonomy

We submitted feedback to the Commission on the final report of the 'Taxonomy 4' Technical Screening Criteria (TSCs) issued by the Sustainable Finance Platform.

Bathing Water Directive and Sewage Sludge Directive

The European Commission postponed the revision of the Bathing Water Directive (BWD) and the Sewage Sludge Directive (SSD) until after the Urban Waste Water Treatment Directive revision concludes. We continue to keep an eye on developments.

Valuing our water services

Understanding the value of our water services is investing in our future and the future of the next generations 9.9

Our water service providers deliver day and night. Every time you need safe and clean tap water for drinking, hygiene and sanitation, all you have to do is open a tap.

These same service providers conduct used water away from our homes and businesses to treat it before it is returned to the environment, recycling the valuable nutrients along the way and helping to keep us healthy.

All too often these privileges are taken for granted. Understanding the value of our water services is investing in our future and the future of the next generations. Water gives us life. Awareness of the value of water services will ensure that they are effective, efficient, resilient, sustainable and affordable for all.

The paper on the Value of Sanitation Services was published in 2022. It complements the paper on the Value of Water Services.



EurEau welcomes new members

EurEau welcomed Ukrvodokanal as an associate member in May. The Ukrainian drinking water and wastewater association was established 30 years ago and counts about 130 members.

We were also joined by the Association of Latvian Water Supply and Sewerage Companies (LWWWW) as a member in October. LWWWW is an association where water management and industry companies unite with common interests and goals. In total, they unite 50 members.

We look forward to working closely with our Ukrainian and Latvian colleagues. These two new members bring EurEau's total membership to 36 members in 31 countries as at 31.12.22.

The much-anticipated EurEau Innovation Sharing Platform (ISP) is now live!

The ISP is an online collaboration space to share your innovative ideas and solutions to the water challenges we face, with your colleagues from across Europe. The platform is open to EurEau members and to your member organisations. We have discussion spaces for Climate Change and Waste Water, Demand Management – Drinking Water, and Critical Materials, with more to come in 2023. We are also hosting webinars to kick off new themes.



www.eureau-innovation.org

EurEau Innovation Sharing Platform Water services and Ukraine

The European water sector is encouraged to check whether they can provide urgently needed aid 99

In response to Russia's invasion of Ukraine, Europe's water service providers stepped up to assist both Ukrainian service providers and refugees fleeing the conflict.

The Ukrainian water association Ukrvodokanal was accepted as an associate EurEau member in May.

You can read more about the practical aid provided by Belgium and Germany, Denmark, France, Ireland, Poland, Romania and Slovakia.

The Polish organisation IGWP launched a website with a list of needs in the Ukrainian water sector, in particular for materials and equipment. All actors in the European water sector are encouraged to check whether they can provide urgently needed aid. You can find a list of needed equipment here that the IGWP is keeping updated together with the Ukrainian organisation.

Operators Without Borders and IGWP issued a call for volunteers to participate in training sessions and to eventually go to Ukraine and help water utilities there.

The Association of Water Utilities of Ukraine shared some information with us regarding the ongoing situation there. You can read their online journal (in Ukrainian and English) on water supply and wastewater collection and treatment during the war, or watch a video on the water sector challenges. You can also watch a video on water supply in the Sumy region and the Mykolaiv region during the war. There is a video here of the situation at the beginning of the war.

Our Ukrainian colleagues are still collecting donations. You can find out more here.





Our Joint Working Groups on

Innovation, Micropollutants, Reuse, Value of Water Services, and the Water Framework Directive were also active this year, meeting several times to advance on their themes.

We have two Task Forces, one to look at PFAS, chaired by Jos van den Akker (Unie van waterschappen and Vewin, The Netherlands) and one on Taxonomy. Luigi del Giacco (Utilitalia, Italy) took over from Søren Povlsen (DANVA, Denmark) as chairperson. Both Task Forces were also active throughout the year.

EurEau's Executive Committee met five times. Three of these were online, while the first in-person meeting in over two years took place in Seville, Spain. The ExCom was also a guest of the IGWP in Gdansk, Poland.

Our General Assembly met twice, once in Vienna, Austria and also as part of our Annual Congress in Malta.

Our Annual Congress took place in St Julien, Malta in October. After a 3-year hiatus, it was wonderful to meet colleagues from across all committees and EurEau bodies. We hosted a plenary session themed on the way to energy independence – new challenges for the European water sector, with guest speakers Miriam Dalli, the Maltese Minister for the Environment, Energy and Enterprise, and Veronica

Manfredi, Director for Zero Pollution in DG Environment of the European Commission. Our Maltese colleagues also provided a site visit, and social events to help extend our water network. A big thank you to Water Services Corporation for hosting us.

Thank you to all those who volunteered to host meetings for us this year. While online meetings are useful, there is no replacement for meeting colleagues and friends in person.

Water Lobby Group

The Water Lobby Group is an informal group made up of professionals working for EurEau's members in the fields of European affairs, advocacy, corporate affairs and international affairs. The group meets monthly and is coordinated by the EurEau Secretariat. We encourage participants from national associations to attend. The group is essential to our work on legislative files, such as the Drinking Water Directive and the Urban Waste Water Treatment Directive.

EurEau Network of Communications Managers

Our communications colleagues meet informally online every month to share updates on our work. We met in Berlin for our annual in-person meeting, including site visits to water reuse projects in the city.



The working group 'Water Management' of the Intergroup on Biodiversity, Climate Change and Sustainable Development' continues to meet.

The Intergroup brings together Members of the European Parliament (MEPs) from all political groups and Parliamentary Committees to find sustainable solutions to some of the greatest challenges of our time. We support it and sit on the advisory board.

We co-organised three meetings this year, on microplastics and EPR, climate change and on PFAS.

Research projects are an important part of our members' work. We participate on several advisory boards. These are the research projects

that we contributed to in 2022.

Research Projects EurEau Representative Jan Peter van der Hoek (Vewin, NL) **TRUST** Jo Severyns (Belgagua, BE) **Co-UDlabs** Pierre Pieronne (FP2E, FR) ZeroPM **JRC** (SARS Cov-2 monitoring Communication: Gari Villa Landa in wastewater) (EurEau)

Participation in research projects

Looking forward to 2023

2022 will be remembered as the year when the Russian army attacked Ukraine. This did not only bring death to thousands of people and suffering to millions more, it also brought massive destruction to the Ukrainian drinking water and wastewater infrastructure.

Water service providers in the rest of Europe felt the consequences of the war through skyrocketing energy and raw material prices and supply disruptions. While these problems are gradually diminishing, we see another victim emerging on the horizon: the European Green Deal.

When it was announced in 2019, the European Green Deal was seen as ambitious, with renewed enthusiasm for finding solutions to a changing climate and carbon neutrality. We held out hope for the proposed measures "to address pollution from urban runoff and from new or particularly harmful sources of pollution such as microplastics and chemicals, including pharmaceuticals" and that we would see more use of the Control-at-Source Principle.

A lot can change in three years.



Despite all official declarations in support of strong control-at-source measures and the rigorous application of the Polluter-Pays Principle, the reality looks somewhat different. The Commission's proposals for an ambitious Sustainable Use of Plant Protection Products Regulation meet with strong resistance in parts of the European Parliament and in many Member States and the protection of our drinking water resources does not seem to be a priority. Similarly, efforts are underway to weaken another key legal act to protect our water resources: the Industrial Emissions Directive. It is unclear whether the revision of REACH and the pharmaceuticals legislation will fall victim to the same logic. The publication of these legal acts has been postponed into late 2023.



The water sector is willing to take up new challenges towards full Green Deal compliance despite a very difficult economic and political environment 99

On the other hand, we expect the co-legislators to support substantially stricter requirements in downstream legislation such as the proposed Water Framework Directive and its daughter directives, and in end-of-pipe legislation such as the draft revised Urban Wastewater Treatment Directive. Let me be clear, the water sector is willing to take up new challenges towards full Green Deal compliance despite a very difficult economic and political environment. We want to be part of the solution in terms of closed resource cycles, energy production and climate neutrality. However, the burden of protecting public health and the environment must be shared with the full value chain. Avoiding pollution at the source must be the first step on the way to meeting our zero pollution ambition.

On a more positive note, the Commission proposed an Extended Producer Responsibility scheme for the removal of pharmaceutical and cosmetic substances from wastewater, thus implementing the Polluter-Pays Principle. The next months will show, whether the colegislators are willing to support this courageous step.

So 2023 is likely to see a debate that we thought had been decided long ago. And with the European elections approaching we can expect

the further polarisation of political positions. Moreover, the pressure to strike deals on the above-mentioned legislative acts by March 2024 – when the elections take place - might lead to painful sacrifices in their ambition levels.

EurEau will continue to strive for measures to keep pollutants out of the water cycle and support the water sector's journey towards climate and resource neutrality.

Looking at internal developments, EurEau will hold elections in May 2023. From July onwards, we will have a new president, a new Executive Committee and new committee chairs. Already now, I would like to thank the current elected representatives for their work. The success of EurEau is largely owed to their dedication and enthusiasm. I am convinced that their successors will be equally committed to EurEau's further development.

So, 2023 will be an exciting year in many respects. Because water matters.

O- hall

OLIVER LOEBEL
EurEau Secretary General



Our experts attend the Common Implementation Strategy (CIS) meetings of the Water Framework Directive and the Expert Groups meetings of the Bathing Water Directive, Drinking Water Directive and the Urban Waste Water Treatment Directive.

These fora can be attended exclusively by European umbrella federations, such as EurEau.1

European Commission

Zero Pollution Stakeholder Platform

FP: Dr Claudia Castell Exner (DVGW, DE) CC: Anders Finnson (Svenskt Vatten, SE)

DWD expert group

FP: Eric Chauveheid (Vivaqua, Belgaqua, BE) CC: Miquel Paraira (Aigues de Barcelona, AEAS, E)

CC: Sébastien Mouret (EurEau)

UWWTD expert group

FP: Jean-Pierre Silan (AIDE, Belgaqua, BE)

CC: Michael Bentvelsen (UvW, NL) CC: Gari Villa-Landa (EurEau)

BWD expert group

1 Situation as of 13.04.23

FP: Ronan Kane (Irish Water, IRL) CC: Sébastien Mouret (EurEau)

Fertiliser Regulation expert group

FP: Sébastien Mouret (EurEau) CC: Arne Haarr (Norsk Vann, NO) CC: Oliver Loebel (EurEau)

Expert Group on the Implementation of the EU Soil Strategy

FP: Arjen Frentz (Vewin, NL) CC: Oliver Loebel (EurEau)

Advisory Group on Sustainable Food Systems

FP: Oliver Loebel (EurEau)

ERNCIP

Miquel Paraira Faus (Aigues de Barcelona, AEAS, E) Oliver Loebel (EurEau)

European Commission WFD CIS

Strategic Coordination Group

FP: Oliver Loebel (EurEau) CC: Sébastien Mouret (EurEau)

WG CHEMICALS

FP: Jo Severin (Belgaqua, BE) CC: Rafael Heredero (EurEau) CC: Michael Bentvelsen(UvW, NL)

WG CHEMICALS

SG on effect-based tools

FP: Magali Dechesne (FP2E, FR)

WG Data Information and Sharing

FP: -

CC: Dominique Gatel (Veolia/FP2E, FR)

CC: Oliver Loebel (EurEau)

WG ECONOMICS

Klara Ramm (IGWP, PL) Ignacio Lozano (AEAS, ES)

WG ECOSTAT

CC: Sébastien Mouret (EurEau)

WG FLOODS

FP: Michael Bentvelsen (Unie van

Watershappen, NL)

CC: Oliver Loebel (EurEau)

WG GROUNDWATER

FP: Claus Vansgaard (DANVA, DK) CC: Sébastien Mouret (EurEau) CC: Rob Eijsink (Vewin, NL) CC: Alena Trancikova (AVS, SK)

WG WATER REUSE

FP: Francesca Pizza (Utilitalia, IT) CC: Oliver Loebel (EurEau) CC: Gari Villa-Landa (EurEau)

ATG Water Scarcity and Drought

Dominique Gatel (FP2E, FR) Gari Villa-Landa (EurEau)

ECHA

Biocidal Products Committee

Eduardo Arozamena Ramos (AEAS, ES)

Committee for Risk Assessment

Dr. Karsten Nödler (DVGW-TZW, DE)

Committee for Socio-Economic Analysis

Expert: Andreas Hein (DVGW-IWW, DE)
Representative: Oliver Loebel, EurEau)





All Policies for a Healthy Europe Initiative

Oliver Loebel (EurEau)

ChemSec Business Group

Anders Finnson (Svenskt Vatten, SE)

European Benchmarking Co-operation (Board) Oliver Loebel (EurEau)

HELCOM

Paula Lindell (FIWA, FIN)

OECD Governance Initiative

Lucia Pitzurra (Utilitalia, IT)

OECD Roundtable on financing water

Mariano Blanco (AEAS, ES) Gari Villa-Landa (EurEau)

Tyre and Road Wear Particles Platform Oliver Loebel (EurEau)



EurEau Executive Committee 2023

EurEau President

Pär Dalhielm (Svenskt Vatten, Sweden)

Executive Committee

Claudia Castell-Exner (DVGW, Germany) Luigi del Giacco (Utilitalia, Italy) Sandis Dejus (Latvian Water and Wastewater Works Association, Latvia) Karl Cilia (Water Services Corporation, Malta) Klara Ramm (IGWP, Poland) Mariano Blanco Orozco (AEAS, Spain)

Alain Gillis, Belgaqua (Belgium) (EurEau Treasurer)

Stuart Colville (Water UK, UK)

EurEau Committee Chairpeople

Co-Chairpeople of the EurEau Committee on Drinking Water (EU1)

Riina Liikanen (FIWA, Finland) Gesche Grützmacher (DVGW, Germany)

Co-Chairpeople of the EurEau Committee on Waste Water (EU2)

John Casey (Uisce Éireann, Ireland) Paula Lindell (FIWA, Finland)

Co-Chairpeople of the EurEau Committee on Economics and Legal Affairs (EU3)

Denis Bonvillain (FP2E, France) Brian Murphy (Uisce Éireann, Ireland)



EurEau member associations and General Assembly Representatives 2023





AUSTRIA

Raimund Paschinger

ÖVGW – Österreichische Vereinigung für das Gas- und Wasserfach | Austrian Association for Gas and Water

www.ovgw.at

ÖWAV – Österreichischer Wasser- und Abfallwirtschaftsverband | Austrian Water and Waste Management Association

www.oewav.at



BELGIUM

Alain Gillis

Belgaqua – Belgische Federatie voor de Watersector | Fédération Belge du Secteur de l'Eau | Belgian Federation for the Water Sector

www.belgaqua.be



BULGARIA

Vassil Trenev

Съюз на ВиК операторите в Република България | Union of Waste Water Operators in the Republic of Bulgaria

www.srvikbg.com



CROATIA

Andrej Marochini GVIK – Hrvatska grupacija vodovoda i kanalizacije | Croatian Water and Waste Water Association

www.hgvik.hr



CYPRUS

www.ssyak.com.cv

Sophocles Christodoulides Σύνδεσμος Συμβουλίων Ύδρευσης-Αποχέτευσης Κύπρου | Cyprus Association of Water and Sewerage Boards SOWA K

CZECH REPUBLIC

Ondrej Benes

SOVAK CR – Sdružení oboru vodovodů a kanalizací České republiky | Water Supply and Sewerage Association of the Czech Republic

www.sovak.cz



DENMARK

Carl-Emil Larsen

DANVA - Dansk Vand og Spildevandsforening |

Danish Water and Waste Water Association

www.danva.dk



ESTONIA

Raili Kärmas

EVEL - Eesti Vee-ettevõtete Liit

Estonian | Water Works Association

www.evel.ee



FINLAND

Riku Vahala

FIWA - Vesilaitosyhdistys - Vattenverksförening | Finnish Water Utilities Association

www.vvy.fi



FRANCE

Denis Bonvillan

FP2E - Fédération Professionnelle des Entreprises de l'Eau | Professional Federation of Water Companies

www.fp2e.org





GERMANY

Claudia Castell-Exner

BDEW - Bundesverband der Energie- und Wasserwirtschaft | German Association of Energy and Water Industries

www.bdew.de

DVGW - Deutscher Verein des Gas- und Wasserfaches e.V | German Technical and Scientific Association for Gas and Water www.dvgw.de



www.edeya.gr

GREECE

Markos Sklivaniotis $\begin{cal}EN\Omega\Sigma H \Delta HMOTIK\Omega N & E\PiIXEIPH\Sigma E\Omega N Y \Delta PEY \Sigma H \Sigma \\ A\PiOXETEY \Sigma H \Sigma - E. \Delta. E. Y. A. & EDEY A - Hellenic Union of Municipal Enterprises for Water Supply and Sewage \\ \end{cal}$



HUNGARY

Edit Nagy

MaVíz - Magyar Víziközmű Szövetség | Hungarian Water Utility Association

www.maviz.org





IRELAND

Brian Murphy

CCMA - The County and City Management Association

www.lgma.ie/en/ccma/

Irish Water

www.water.ie



ITALY

Luigi Joseph Del Giacco Utilitalia - Associazione delle imprese idriche energetiche e ambientali | Federation of Energy, Water and Environmental Services

www.utilitalia.it



LATVIA

Sandis Dejus

LUKA | Latvian Water and Wastewater Works Association (LWWWWA)

www.lwwwwa.lv



LITHUANIA

Brigita Gudoné Vandens Jėga | Lithuanian Water Services Association

www.vandensjega.lt



LUXEMBOURG

Georges Kraus

ALUSEAU - Association Luxembourgeoise des Services d'Eau | Luxembourg Association of Water Services

www.aluseau.lu



MALTA

Karl Cilla

Water Services Corporation

www.wsc.com.mt



NORWAY

Ragnhild Aalstad Norsk Vann | Norwegian Water

www.norskvann.no



POLAND

Klara Ramm
IGWP - Izba Gospodarcza Wodociagi Polskie |
Polish Waterworks Chamber of Commerce

www.igwp.org.pl



PORTUGAL

Rui Marreiros

APDA - Associação Portuguesa de Distribuição e Drenagem de Águas | Portuguese Association of Water and Wastewater Services

www.apda.pt



ROMANIA

Mircea-Valentin Macri ARA - Asociatia Romana a Apei | Romanian Water Association

www.ara.ro



SERBIA (associate member)

Dalibor Joknic
CCIS - Privredna Komora Srbije |
Chamber of Commerce and
Industry of Serbia
www.pks.rs



SLOVAKIA

Vladimír Jakub AVS - Asociácia Vodárenských Spoločností | Association of Water Companies

www.avssr.sk



SLOVENIA

Iztok Rozman

ZKG - Zbornica komunalnega gospodarstva | Chamber of Public Utilities

www.komunalna-zbornica.si



SPAIN

Mariano Blanco Orozco

AEAS - Asociación Española de Abastecimientos de Agua y Saneamiento | Spanish Water and Waste Water Association

www.aeas.es

SvensktVatten

SWEDEN

Pär Dalhielm Svenskt Vatten | The Swedish Water and Waste Water Association

www.svensktvatten.se





SWITZERLAND

Martin Sager SSIGE / SVGW - Société Suisse de l'Industrie du Gaz et des Eaux | Schweizerischer Verein des Gas- und Wasserfaches | Società Svizzera dell'Industria del Gas e delle Acque | Swiss Gas and Water Industry Association

www.svgw.ch

VSA - Association suisse des professionnels de la protection des eaux | Verband Schweizer Abwasser- und Gewässerschutzfachleute | Associazione svizzera dei professionisti della protezione delle acque | Swiss Water Association www.vsa.ch





THE NETHERLANDS

Hans de Groene
UvW - Unie van Waterschappen
www.dutchwaterauthorities.com

Vewin - Vereniging van waterbedrijven in Nederland

www.vewin.nl



UKRAINE (associate member)

Andrii Nikitin

Укрводоканалекологія - Постачальники водних послуг України | Ukrvodokanalecology - Postachalnyky vodnykh posluh Ukrayiny | Ukraine's Water Services Providers

www.ukrvodokanal.in.ua



UNITED KINGDOM

Stuart Colville Water UK

www.water.org.uk



About EurEau

EurEau is the voice of Europe's water sector. We represent drinking water and wastewater operators from 32 countries in Europe, from both the private and the public sectors.

Our members are 37 national associations of water services. At EurEau, we bring national water professionals together to agree European water sector positions regarding the management of water quality, resource efficiency and access to water. With a direct employment of around 476,000 people, the European water sector makes a significant contribution to the European economy.





