Question for written answer E-002988/2025
to the Commission
Rule 144
Elżbieta Katarzyna Łukacijewska (PPE), Ewa Kopacz (PPE), Danuše Nerudová (PPE), Marta Wcisło (PPE), Magdalena Adamowicz (PPE), Dolors Montserrat (PPE), Dariusz Joński (PPE), Elena Nevado del Campo (PPE), Susana Solís Pérez (PPE), Bartłomiej Sienkiewicz (PPE), Michał Wawrykiewicz (PPE), Dimitris Tsiodras (PPE), Michalis Hadjipantela (PPE), Massimiliano Salini (PPE), Flavio Tosi (PPE), Borys Budka (PPE), Oliver Schenk (PPE), Jan Farský (PPE), Tomáš Zdechovský (PPE), Laurent Castillo (PPE), Adam Jarubas (PPE), Dan-Ştefan Motreanu (PPE), Christophe Grudler (Renew), Peter Liese (PPE), Marie-Pierre Vedrenne (Renew)

Subject: Study on the potential costs and impact of the Urban Wastewater Treatment Directive (UWWTD) on the pharmaceutical and cosmetic sectors.

The UWWTD[1] raises concerns, as its EPR scheme assigns 80 % of quaternary treatment costs to cosmetics and pharmaceuticals.

The scheme appears scientifically unfounded and contrary to the ‘polluter pays’ principle (PPP). New Commission data shows that cosmetics contribute only around 1.5 % of toxic load, far below the 26 % cited in the impact assessment, an overestimation by at least 15 times.

This discrepancy calls the fairness and effectiveness of the UWWTD into question and places a disproportionate administrative burden on the cosmetics sector, especially SMEs.

The water resilience strategy states the Commission will update its cost and impact analysis under Article 9 UWWTD before implementing EPR.

1. When does the Commission plan to conduct an updated study on EPR costs and the potential impact on the sectors concerned, as envisaged in the water resilience strategy?

2. Will the Commission propose pausing implementation work until the above study is conducted to ensure that national-level discussions are based on both robust data and contributions from sectors concerned by the toxic load in urban wastewater?

3. What regulatory measures does the Commission envisage to help adjust and improve the efficacy of the EPR scheme and ensure a fair application of the PPP, and can it introduce a switch from a sector-based approach to a substance-based approach to reflect the complexity of water pollution EPR?

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[1] Directive (EU) 2024/3019 of the European Parliament and of the Council of 27 November 2024 concerning urban wastewater treatment, (OJ L, 2024/3019, 12.12.2024, ELI: http://data.europa.eu/eli/dir/2024/3019/oj).