

To: [REDACTED]

Subject: Call to postpone the decision on the Urban Wastewater Treatment Directive until an in-depth socio-economic analysis has been carried out

Dear [REDACTED],

Ahead of the Trilogue negotiations meeting on the revision of the Urban Wastewater Treatment Directive (UWWTD) scheduled on 29 January, we would like to share our concerns regarding the efficacy of the proposed approach in tackling water pollution throughout the EU.

We support the overall objective of the revision to address water pollution, one of the main challenges of current times. **Nevertheless, we consider that a sector-based Extended Producer Responsibility (EPR) system which only includes two sectors – pharmaceuticals and cosmetics – is not compliant with key principles of EU Treaties** (e.g., proportionality, equal treatment and polluter pays principle) and misses its main goal of incentivising all polluters to invest in more sustainable products. **Every stakeholder contributing to micropollutants in the water must be part of any solution to enable the cleanest water possible.**

There is no reason why the pharmaceutical and cosmetics industries alone should cover the costs of pollution caused by individuals and other sectors. The two sectors are committed to take on their fair share of responsibility in addressing water pollution and the pharmaceutical industry has already put in place an extensive [Eco-Pharmaco-Stewardship programme](#), which over the past 15 years has made great progress in minimising the effects of pharmaceuticals in the environment.

Before any proposal on an EPR system is adopted there is a need for an in-depth examination of the legal and financial impact the directive would have in several areas, including in terms of access and affordability of medicines.

Moreover, unless changes are made to the text, the current EPR system proposal will fail its very core objective, which is to provide incentives to all producers to develop greener products as part of the European Green Deal Zero Pollution and EU's Open Strategic Autonomy goals. In recent years, other regions of the world such as the US and Asia have become more competitive and attractive for innovators, while in Europe we see a declining share of research investment, especially in the technologies that will shape the future of health, such as cell and gene therapies.

Unless changes are made towards a fair EPR system which would consider all sources of micro-pollution regardless of sectors, we call on you to not endorse the outcome of the Trilogue negotiations and postpone a decision until a second reading to ensure that socio-economic impacts of this directive are properly examined.

Yours sincerely,



Nathalie Moll, Director General
EFPIA



Han Steutel, President
vfa