

Feedback from:

EurEau - European Federation of National Associations of Water Services

Micropollutants are a challenge for waste water operators, whose mission is to treat waste water to ensure the protection of the environment and ecosystems, and for drinking water operators, who have to rely on drinking water resources to produce drinking water. Micropollutants can enter the water cycle directly or indirectly via the waste water treatment infrastructure: urban and domestic waste water, industrial waste water, hospital effluents, storm water runoffs, and also through agricultural or rural runoffs and manure. Since micropollutants are not entirely biodegradable, once present in the water cycle, they can gradually accumulate and could pose a risk to drinking water resources and aquatic ecosystems. Technologies currently used in waste water treatment plants are not entirely capable of removing micropollutants. Advanced treatment processes exist but they are expensive, energy intensive and often substance-specific: they rarely come out well in cost effectiveness and environmental performances analysis. Innovative technologies and solutions that address these drawbacks are being developed. EurEau recognises that these may provide a useful treatment solution for tackling specific micropollutants or addressing specific local conditions in the long term. The most sustainable and preferred solution however is to prevent micropollutants from entering the water cycle in the first place. Steps should be taken at various

stages before they can enter the water cycle to prevent them from doing so. Their release should be addressed as a priority at the source, meaning along the different steps that precede their emission, discharge or loss into the aquatic environment. Establishing the necessary conditions that support such a source control approach is an EU wide challenge.

EurEau calls on the European institutions to:

- adopt a strategic approach to micropollutants based on the source control principle
- consider the life-cycle approach to substances when legislating
- use the ecolabel more extensively, and
- contribute to awareness-raising amongst citizens.

The Directive on Priority Substances requires the European Commission to come up with a strategic approach to pharmaceuticals in the environment (PiE). EurEau supports the adoption of such a strategic approach where actions should be taken along the whole life cycle of a pharmaceutical product (design, authorisation, marketing and post marketing) so that potential environmental damage is rectified at the source (see attached paper).

Unlike pharmaceuticals consumed by humans, which tend to end up in the aquatic environment through point source discharges associated with waste water treatment works, veterinary medicines will tend to follow a more diffuse route affecting the rural water cycle rather than urban ones. Pharmaceuticals can enter the water cycle in many ways: i) via direct application such as in aquaculture; ii) animal excretion on land which drains into the water cycle; iii) through secondary application of composted animal manures or iv) through the disposal of other solid and liquid animal wastes. Pharmaceutical residues can be found either in the form of the active compound or metabolites. EurEau considers that action is needed on different levels to reduce the presence of veterinary pharmaceuticals in the aquatic environment:

- Design level: development of green pharmacy

- Authorisation level and post-authorisation level
- Veterinarians' prescription level: It is very difficult to foresee the actual loading of veterinary pharmaceuticals in the environment, since, contrary to medications for human use, there are no audit trails associated with prescription practices, thus there is lack of information and transparency in the current system. This lack of information is proposed to be reversed particularly in the cases of large animal populations such as big farm.
- Application level
- Good agricultural practises

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