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## › JOINT STATEMENT

**No “stop the clock” on Extended Producer Responsibility – no obligation for advanced wastewater treatment without EPR**

April 2026

We, the undersigned representatives of local and regional authorities and wastewater treatment operators, reaffirm our strong support for the **swift and full implementation of the revised Urban Wastewater Treatment Directive (UWWTD)**, including its provisions on **Extended Producer Responsibility (EPR)**.

The revised UWWTD is a major step forward in protecting Europe’s water bodies, public health, and the environment. At the same time, it places **far-reaching technical, organisational, and financial demands** on urban wastewater treatment systems across Europe. The required investments are long-term, capital-intensive, and depend critically on **early planning, legal certainty, and reliable financing instruments**.

In this context, we are deeply concerned by recent discussions in the European Parliament calling for a **“stop the clock” on the implementation of Extended Producer Responsibility**. We strongly oppose such an approach.

### **EPR is essential for fair, socially sustainable, and predictable financing**

Extended Producer Responsibility is a **central pillar of the revised directive**. It ensures that the costs of removing micropollutants are allocated in line with the **polluter pays principle**—to those who place the relevant products on the EU market. For the first time, the directive establishes a financing mechanism that holds polluters financially responsible and creates incentives for pollution prevention at source.

If EPR were removed, suspended, or put on hold, the costs of advanced wastewater treatment would **inevitably be shifted almost entirely onto wastewater charges**. This would result in a **disproportionate and excessive burden on citizens and local communities**, who already finance the majority of wastewater infrastructure and services. Such a shift would be socially unjust, politically unsustainable, and fundamentally at odds with the objectives of the directive.

### **Planning and investment certainty require EPR**

Urban wastewater treatment infrastructure is planned and financed over **investment cycles spanning several decades**. The upgrades required under the revised UWWTD—including **both tertiary (third) and quaternary (fourth) treatment stages**—are capital-intensive and technically interlinked. They cannot be planned, tendered, or implemented in isolation.

Without legal certainty on EPR as a **stable and long-term financing instrument**, wastewater operators and local authorities are **unable to reliably plan investments for either the third or the fourth treatment stage**. A “stop the clock” on EPR would therefore paralyse investment decisions, delay upgrades across the entire treatment chain, and undermine the directive’s implementation schedule.

### **Quaternary treatment obligations and EPR are inseparable**

The mandatory introduction of quaternary treatment and the establishment of Extended Producer Responsibility were deliberately designed as **two inseparable elements** of the revised UWWTD. This balance is essential to ensure environmental effectiveness, financial fairness, and practical feasibility.

We therefore state clearly: **If Extended Producer Responsibility is suspended, delayed, or significantly weakened, the mandatory obligations for advanced wastewater treatment in terms of quaternary treatment must also be suspended. The two cannot stand independently of one another.**

Maintaining binding upgrade obligations while freezing EPR would undermine planning and investment security, erode public acceptance, and shift financial responsibility away from polluters and **onto municipalities and wastewater fee payers**.

We therefore call on the European institutions to:

- **Reject any “stop the clock” for Extended Producer Responsibility,**
- **Explicitly reaffirm the inseparable link between EPR and the obligations for advanced wastewater treatment, and**
- Provide the **legal and financial certainty** required to enable timely, efficient, and socially acceptable implementation of the revised UWWTD.

Only by keeping responsibilities, obligations, and financing mechanisms fully aligned can the Urban Wastewater Treatment Directive deliver its full potential for protecting Europe’s waters, environment, and public health.