

NEW PROPOSAL FOR A “REGULATION OF THE EUROPEAN PARLIAMENT AND OF THE COUNCIL ON MINIMUM REQUIREMENTS FOR WATER REUSE” - POSITION PAPER BY EU URBAN AGENDA PARTNERSHIP ON CIRCULAR ECONOMY

Nowadays water reuse is a critical issue in order to move forward to circular transition and sustainable development of the city. Although public and private demand for reclaimed water is high, there are strong restrictions towards the use of cleaned water from wastewater treatment plants (thereinafter “reclaimed water”). European cities have, in general, a single system for collecting urban wastewater, including wastewater from industrial and commercial activities, which results in the limitation for these cities to reuse water under the current legislation.

For this reason, the EU Partnership on Circular Economy welcome the European Commission’s proposal for a “Regulation of the European Parliament and of the Council on minimum requirements for water reuse”. This proposal has among its objectives the reduction of water scarcity ensuring the healthiness of agro-food productions that require water as production input. Reuse treated water for agricultural irrigation is very attractive, taking into account the large amount needed for this activity. Given increasing water scarcity trends in many European cities, the use of reclaimed water for urban uses such as street cleaning and irrigation of green spaces should also be encouraged. These activities have the potential to trigger new positive collaborations between private and public entities (e.g. industrial symbiosis), to find innovative solutions to use resources, and thus to increase revenues while reducing waste.

The EU Partnership on Circular Economy, in delivering its position on the proposal, provides the following comments:

- 1) Extension of the scope of the regulation to urban uses:** The regulation should include among the classes in Annex I water reuse for civil purposes (e.g. street and car washing; watering of flowerbeds, public gardens and parks). Mediterranean water stress is projected to increase from 9% at 1.5°C to 17% at 2°C compared to 1986-2005 according to the latest IPCC report.¹ Still, cities ready to experiment or upscale water reuse for urban uses sometimes face barriers from the national legislation. A European regulation setting minimum requirements on water reuse for civil purposes, based on the free movement of persons, is the opportunity to lift those legal barriers; provide legal certainty and drive investments in water collection infrastructure; and ensure that citizens enjoy the same level of protection across the EU when visiting urban areas irrigated with reclaimed water. For each purpose, it should be crucial to define distinct levels of quality, according impact to human health and environment.
- 2) Realistic applicability of the proposed minimum quality requirements:** We agree with the levels established for quality requirements (Annex I) in the current proposal. We

¹ IPCC SR1.5, chapter 3, p. 108 <https://www.ipcc.ch/sr15/chapter/chapter-3/>

suggest taking into account detection limits. Requirements are realistic and vary in a reasonable manner in correspondence with the different types of crops and destination.

- 3) **A clearer Risk Assessment procedure:** The competent authority should be in charge of overseeing the risk management in collaboration with the entities responsible for water reuse projects, operators of reclamation facilities and users. The distribution of these responsibilities and the role of each involved actor should be clearly specified. It is not explicitly mentioned that the risk management plan needs to be constantly updated. In order to guarantee a standardization in risk management, the regulation should expressly indicate to refer to international recognized standards. This will facilitate the work of the bodies responsible for issuing the authorization of the plant and the subsequent verification.
- 4) **Health and safety of agro-food production using reclaimed water:** In order to ensure that the reclaimed water is safe, thus protecting citizens and the environment, a collaboration among the reclaimed plant operator and food operators could create positive industrial symbiosis. Thus, further indications for food operators (e.g. end-users) should be added to push them to take into specific account the hazards linked to the use of reclaimed water (e.g. in order to add control points and analyses in their HACCP plans, where requested). When using reclaimed water, the end-users shall ensure the use of appropriate reclaimed water, based on the quality classes included in the proposal. At city level, this kind of collaboration can advance social relationships among the involved local actors, including surrounding neighborhoods.

The Urban Agenda Partnership on Circular Economy

The Pact of Amsterdam was adopted in the first half of 2016, during the Dutch Presidency of the Council of the EU, by the EU Ministers responsible for Territorial Cohesion and/or Urban Matters. The Pact strives to involve Urban Authorities in achieving Better Regulation, Better Funding, and Better Knowledge. The relevance of this involvement is highlighted by the statistic that cities and urban areas now house more than 70% of all Europeans.

The Partnership consists of six urban authorities, namely the City of Oslo, The Hague, Prato, Porto, Kaunas and Flanders region. The Partnership has members from the governments of Finland, Poland, Slovenia and Greece. The European Commission (DG REGIO, DG ENV, DG RTD), the Council of European Municipalities and Regions (CEMR), EUROCITIES, URBACT, the European Investment Bank (EIB) and the Association of Cities and Regions for sustainable Resource management (ACR+) are also partners.

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