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FEAD Feedback to the Draft Delegated Act on risk management in water reuse in agriculture

FEAD, the European Federation for Waste Management and Environmental Services, representing the private waste and resource management industry across Europe, **welcomes** the Commission's Delegated Regulation on risk management in water reuse in agriculture.

This draft Delegated Act, to a certain extent, encompasses the conflicting goals of zero pollution and the transition to a circular economy, mentioning both the Circular Economy Action Plan and the revision of the Urban Wastewater Treatment Directive 91/271/EEC (UWWTD), as part of the Zero Pollution Action Plan. Therefore, **technical specifications of key elements of risk management are paramount to ensure comprehensive protection of human, animal, and soil health.**

Identification of potential hazards and hazardous events

FEAD appreciates that the Commission emphasizes the importance of the issues related to water, namely that climate change leads to water resources being increasingly under pressure, and water stress and droughts having become customary across the EU. A comprehensive risk management in water reuse in agriculture must also imperatively tackle these issues.

With this background, the responsible national authorities should manage the two aspects described above to create a harmonized framework that ensures human and animal health protection on one side, and combatting the effect of the climate crisis, such as drought, on the other. **FEAD supports the identification of potential hazards and hazardous events** in the Annex to the Draft Regulation, covering the possible dangers to public health and the environment in a comprehensive way, **also including pollutants that are not yet regulated** (point 5 of the abovementioned section) in point 3 of Annex II to Regulation (EU) 2020/741 on minimum requirements for water reuse.

Production of reclaimed water

On the description of the process to produce reclaimed water, FEAD believes it is appropriate to emphasize that the **parameters for the characterization of the quality of the water should be set after consultation with the operators of the wastewater treatment plants**, and all data must be made available to the operators.

Assessment of risks to the environment and to human and animal health

FEAD believes that it should be clarified that not all the risk matrices mentioned in the risk assessment to the environment and to human and animal health (Annex page 12) listed in paragraph 6 are to be considered for risk assessment, but **only one of them is to be chosen.**

Additional or stricter requirements for water quality and monitoring and preventive measures

FEAD stresses that it is highly important that reclaimed water coming from wastewater treatment plants is used in agriculture, respecting the requirements to ensure the protection

of human and animal health, and of our soils. At the same time, it must be ensured that the reuse of reclaimed water stemming from wastewater treatment plants is enabled in the best possible way. **Where the purpose of reuse in agriculture cannot be satisfied** because the reclaimed water does not comply with the requirements, e.g. it is contaminated or it exceeds thresholds in value, **environmentally friendly water cycles must still be adopted.** Water reuse systems and the storage of rainwater constitute an important contribution to tackling the problem of increased periods of drought, therefore water coming from these systems should be reused in areas particularly affected by drought, as well as for the irrigation of city green.

Consequently, in the Annex of the Delegated Act identifying additional advanced treatments is mentioned as preventive measure that may be used to prevent or eliminate risks to health or the environment or to reduce them to an acceptable level. FEAD believes that this obligation is quite vague. **A clearer obligation for the responsible national authorities to consider different methods to use reclaimed water is needed, wherever a risk assessment leads to the result that reuse in agriculture is not possible.**

FEAD welcomes the provision according to which **additional or stricter parameters or indicators for water quality** shall be selected and their thresholds determined on the basis of the list of hazards and on the outcome of the health and environmental risk assessments, considering the specific water reuse system and the local conditions. We also believe that it should be specified that the above-referred additional requirements **should be determined on the basis of solid technical-scientific evaluations.**

In general, FEAD believes that some of the **required procedures and control and monitoring systems**, such as sampling and analysis methods, data acquisition procedures, or training for personnel **do not require to be specified in the Delegated Act.** Good industrial practices already in place work well in the sector.

To conclude, **we support the idea that the necessity to foster the transition to a circular economy must be constantly emphasized, not least in the field of wastewater management and water reuse.**

FEAD is the European Waste Management Association, representing the private waste and resource management industry across Europe, including 19 national waste management federations and 3,000 waste management companies. Private waste management companies operate in 60% of municipal waste markets in Europe and in 75% of industrial and commercial waste. This means more than 320,000 local jobs, fuelling €5 billion of investments into the economy every year. For more information, please contact:

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