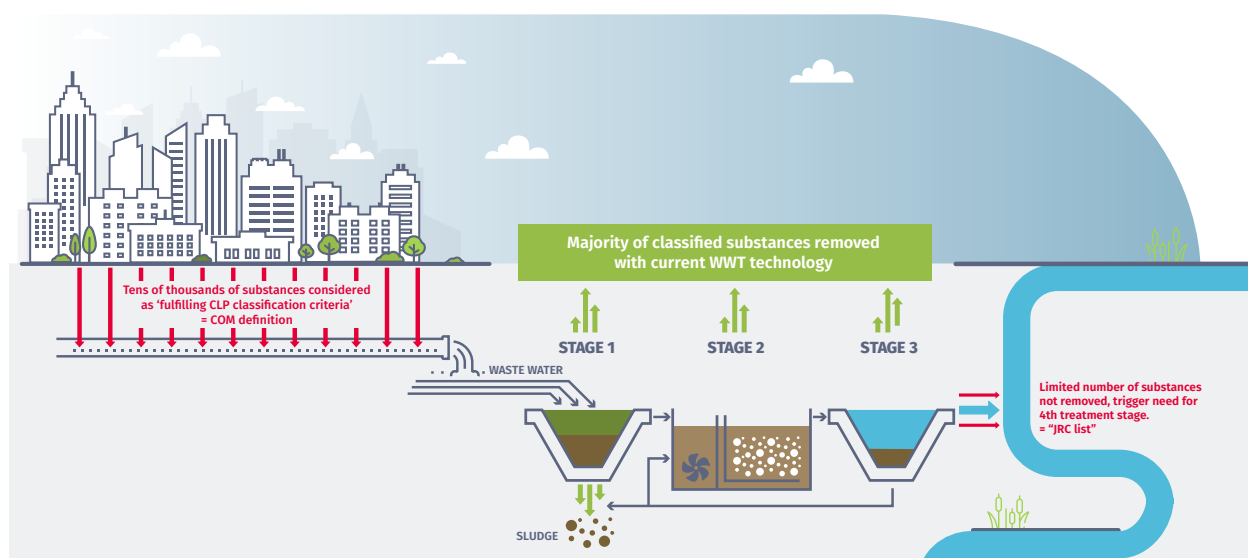


While supporting the overall objectives of the Urban Wastewater Treatment Directive (UWWTD) Revision and the Extended Producer Responsibility (EPR) scheme principles, Cosmetics Europe emphasizes the following

KEY RECOMMENDATIONS: FOR A CLEAR AND FAIR EPR SCHEME IN THE URBAN WASTEWATER TREATMENT DIRECTIVE

- 1. Fair polluter pays principle:** Establish an Extended Producer Responsibility (EPR) scheme that is sector-agnostic, by recognizing that micropollutants come from many different sources, and that fairly allocates costs based on the amount of micropollutants released by each producer.
- 2. Focus on what matters:** Ensure that producers pay, through EPR scheme, for substances that actually trigger the need for upgrading the urban wastewater treatment plants with quaternary treatment, rather than for all potentially classifiable substances entering the plants.



- 3. Clear identification of substances:** Ensure legal certainty and EU-wide harmonisation by clearly identifying relevant substances in an Annex to the UWWTD based on the existing Joint Research Centre methodology or, at the minimum, excluding from the scope any biodegradable substances as these do not require a fourth treatment stage to achieve their full removal.
- 4. Single collection of EPR fees:** Change the definition of 'placing on the market' in line with the European Commission Blue Guide on the implementation of the product rules to avoid multiple EPR fees collections.