

Cosmetics Europe concerned about European Parliament's position on UWWTD revision

Statement

Brussels, 5 October 2023 – Following today's adoption by the European Parliament of its position on the revision of the Urban Wastewater Treatment Directive (UWWTD), Cosmetics Europe continues to emphasize a number of concerns related to the workability of the proposed system, which is not based on sound scientific justifications and does not ensure fairness for economic operators.

While the cosmetics and personal care industry fully supports the overall objectives of the UWWTD revision and the Extended Producer Responsibility (EPR) scheme principle, we believe it is of utmost importance that the proposed EPR schemes are compliant with the polluter pays principle stated in Article 191(2) of the TFEU and any financial contribution is based on the principle of a fair distribution of the burden between all concerned polluters. The current revision proposal attributes the entire financial burden of upgrading urban wastewater treatment plants to only two sectors, pharmaceuticals and cosmetics. However, the impact assessment provided by the European Commission does not demonstrate clear scientific reasons as to why the cosmetics sector has been selected as the second largest polluter ([see Cosmetics Europe analysis](#)). We believe a substance-based approach, building on a defined list of micropollutants, would be better fit for purpose and allow fair identification of companies, regardless of sectors, who should contribute to the EPR scheme as their products do indeed contain micropollutants.

Cosmetics Europe would also like to reiterate its concern about the definition of micropollutants which still remains very broad allowing for the inclusion in its scope of substances that do not pose a problem in the current urban wastewater treatment systems since they are effectively removed through the three stages of treatment (e.g. biodegradable substances).

Cosmetics Europe is also concerned with the proposed way of how the producers' contributions should be determined. We believe that EPR fees should be based on the volume of micropollutants contained in the products placed on the market rather than on the amount of the product. This would help ensure a fair approach towards producers as the amount of the product is not directly proportional to the volume of micropollutants that a product might contain.

Cosmetics Europe will continue to work with stakeholders to ensure that its concerns are well heard and remains open to further collaboration with the Institutions towards workable solutions in the UWWTD revision.

Read more:

[**Cosmetics Europe reacts to EP ENVI Committee's vote on the UWWTD recast**](#)

[**Cosmetics Europe Position Paper on the EC's Proposal for the Revision of the Urban Wastewater Treatment Directive \(UWWTD\)**](#)

***Cosmetics Europe** is the European trade association for the cosmetics and personal care industry. Our members include cosmetics and personal care manufacturers as well as associations representing our industry at national level, right across Europe.*

Media questions

Media representatives should address their questions to media@cosmeticseurope.eu.