



# Urban Wastewater Treatment Directive Water Framework Directive

Austrian Federal Economic Chamber - Wirtschaftskammer Österreich  
(WKO)  
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# Urban Wastewater Treatment Directive

## 1. Background

The Austrian economy is committed to protecting water bodies and the environment from the harmful effects of (municipal) wastewater. The present directive introduces a number of innovations and tightening measures, some of which will have significant impacts on the economy and businesses. Austria is one of six member states that already fully complies with the current directive on municipal wastewater.

On January 1, 2025, the Urban Wastewater Treatment Directive 2024/3019 (UWWTD) came - against vehement resistance of the European industry into force. The aim of the UWWTD is to protect the environment from the harmful effects of municipal wastewater and wastewater from certain industrial sectors. The European Commission has identified deficiencies in the old directive, which are to be addressed with the new directive while also implementing the goals of the Green Deal. Several European associations and Poland have already filed lawsuits against the directive. In early May 2025, the European Parliament submitted an amendment related to the UWWTD, calling for a new impact assessment. The European Commission has announced a re-assessment of the forecast impact of the UWWTD on the pharmaceutical industry.

## 2. Extended Producer Responsibility and EPR (Articles 9 and 10)

The Austrian economy calls for an urgent re-evaluation. The directive and its obligation for the pharmaceutical and cosmetic industries to bear 80% of the costs have seriously negative effects on the pharmaceutical sector in terms of innovation and investment, as well as on the availability of medicines. There were significant deficiencies in the Commission's impact assessment, which violates three main principles of the EU: the polluter pays principle, the proportionality principle, and the non-discrimination principle. The competitiveness of the European industry should be strengthened, and the evidence that led to the impact assessment and feasibility studies of the European Commission should be reviewed more closely.

In Austria alone, affected pharmaceutical companies would have to calculate with triple-digit million amounts annually in the future. Especially for low-priced medicines, the high additional costs lead to these being withdrawn from the market for economic reasons.

At the same time the European Commission launches the highly welcome Critical Medicines Act (CMA) with the goal of strengthening the security of supply of essential medicines in Europe. The EU is now dependent on Asian pharmaceutical imports for 60-80 percent, and 80-90 percent of global antibiotic production is now in Asia - mainly in China. We need a more coherent and coordinated approach between individual policy areas.



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# Water Framework Directive

## Current Situation

- The Water Framework Directive obliges all EU Member States to achieve a “good ecological and chemical status” of water bodies by 2027.
- Austria
  - o 60% of rivers and lakes are not in good ecological status.
  - o Main problems: river regulation, barriers, hydropower use, loss of floodplains.
  - o 33,000 migration barriers - on average one barrier every 1 km.
  - o Chemical status: better than the EU average, but some localized pollution remains.

## Forecast

Austria will not meet the WFD objectives (as likely all MS) by 2027 due to Conflicts with energy policy (hydropower) and land availability, Insufficient funding (planned €150 million for water protection was cut) and slow implementation of measures.

**Position:** The 2027 deadline is unrealistic - adjustment is urgently needed.

## Demands

1. Revision of the WFD: introduction of a 4th management cycle with clear interim targets.
2. Greater flexibility in applying exemptions (Article 4(5)): realistic progress instead of formal failure.
3. Binding financing and land allocation for river restoration.
4. Integration of climate adaptation into the WFD strategy.

## Key Message

*“The environmental objectives of the WFD cannot be achieved by 2027 - Austria will clearly miss them. We need an extension of deadlines and a strategic realignment.”*

## Arguments Against the Strict Deterioration Ban (Weser Judgment)

### Key Message

*“The strict deterioration ban is disproportionate and hampers sustainable development. We need a practical interpretation with de minimis thresholds and flexible exemptions.”*

## Arguments

- Excessive restriction: Even minimal deterioration can stop projects - even if they deliver significant climate and energy benefits.
- Lack of proportionality: No de minimis threshold: even minor changes to a single quality element lead to rejection. Conflict with climate goals and energy transition
- Austria relies heavily on hydropower as renewable energy: Strict application jeopardizes expansion and modernization
- Legal uncertainty and high costs: Complex deterioration assessments → lengthy procedures, high costs, litigation.
- Blockage of flood protection and climate adaptation: Projects for safety and adaptation to extreme events cannot be implemented.

- No flexibility for national circumstances: Austria has many hydromorphologically altered water bodies. A strict ban ignores this starting point and makes realistic improvements impossible.

### **Demands**

- Introduce a de minimis threshold for minor deteriorations.
- Practical interpretation of the deterioration ban.
- Greater use of exemptions under Article 4(7) WFD for projects with high public and climate benefits.

### **Timeline WFD (2000-2027)**

- 2000: Entry into force of the Water Framework Directive (2000/60/EC)
- 2003: First inventory of water bodies
- 2009: 1st River Basin Management Plan (start of first cycle)
- 2015: Original deadline for “good status”
- 2016-2021: 2nd cycle (extensions possible)
- 2022-2027: 3rd cycle (last regular deadline)
- 2027: Absolute deadline for achieving objectives (Article 4(4) WFD)

### **Proposed adjustment:**

- 2028-2033: 4th cycle (revision of WFD, new interim targets)
- 2034-2039: Final achievement of objectives under realistic conditions