

Switzerland's approach to quaternary treatment – a more balanced and effective alternative to the EU UWWTD EPR system

Switzerland is also implementing an additional level of wastewater treatment in order to remove residues of chemicals such as cosmetics, detergents, medicines or pesticides.

This decision offers a more proportionate and workable model compared to the Extended Producer Responsibility (EPR) scheme under the Urban Wastewater Treatment Directive (UWWTD).

The Swiss legal framework entered into force on 1 January 2016.¹ It provides for the co-financing of 75% of the construction costs for new micropollutant removal stages through a dedicated fund. The fund is financed via **a wastewater tax of up to 9 Swiss francs (CHF) per inhabitant** connected to a wastewater treatment plant and will remain in place until 2040.

In 2023, 7.62 million inhabitants connected to 689 wastewater treatment plants were subject to the tax, with revenues amounting to approximately 68.6 million CHF. Once operational, the running costs of the new infrastructure are covered through regular water tariffs.

Switzerland considers this system to be an **effective implementation of the polluter pays principle**, which is also enshrined in the Swiss Constitution,² acknowledging that all citizens contribute to micropollutant discharge and should thus collectively finance the solution.³

Key advantages of the Swiss system:

- **Consistency with previous wastewater treatment stages financing mechanisms**

The UWWTD EPR model departs for no clear reason from the established practices of financing wastewater treatment through water tariffs/taxes or public funds. It places the full burden of

¹ Office fédéral de l'environnement (OFEV), [Programme d'équipement des STEP pour l'élimination des micropolluants](#)

² Constitution fédérale de la Confédération Suisse, [Art. 74](#), Protection de l'environnement:

La Confédération légifère sur la protection de l'être humain et de son environnement naturel contre les atteintes nuisibles ou incommodantes.

Elle veille à prévenir ces atteintes. Les frais de prévention et de réparation sont à la charge de ceux qui les causent.

L'exécution des dispositions fédérales incombe aux cantons dans la mesure où elle n'est pas réservée à la Confédération par la loi.

³ *Message concernant la modification de la loi fédérale sur la protection des eaux*, President of the Confederation, Ueli Maurer and Chancellor of the Confederation, Corina Casanova, 26 June 2013:

"Tous les habitants raccordés à une STEP sont responsables de l'apport de micropolluants dans les eaux. S'ils participent tous financièrement à l'optimisation ciblée des STEP en s'acquittant d'une taxe sur les eaux usées, le principe du pollueur-payeur est largement respecté. C'est aussi une solution simple et pragmatique pour financer l'exécution".

quaternary treatment costs just on two industrial sectors, even though other sectors contribute significantly to pollutants removed in the previous treatment stages, as well as in the future quaternary one, without any financial responsibility.

- **Fair cost distribution across society**

By spreading the costs across the population, the Swiss model avoids placing the financial burden solely on specific groups, such as patients with chronic diseases.

In contrast, the EU's EPR model risks significantly increasing medicine prices or reducing availability for vulnerable populations by concentrating costs on a narrow set of critical and essential medicinal products.

- **Greater administrative efficiency and legal certainty**

The UWWTD EPR approach is overly complex and burdensome. It would require the creation of at least 27 national Producer Responsibility Organisations (PROs), each tasked with calculating and collecting fees from thousands of companies, based on estimates of quantities and hazardousness. This process will inevitably lead to disputes, legal uncertainty, and high administrative costs, undermining harmonisation and efficiency across the Single Market.

We therefore call on the European Union to **reconsider its current approach and instead draw inspiration from the Swiss model**, in order to preserve patient access to medicines and ensure a workable framework that is compatible with the polluter pays principle.