

# Press Release

## Environment Ministers must reconsider wastewater EPR rules as serious scientific and legal concerns mount

Brussels, 12 October 2026

As EU Environment Ministers discuss the implementation of the Urban Wastewater Treatment Directive (UWWTD) Medicines for Europe reiterates their serious concerns regarding the Extended Producer Responsibility (EPR) scheme. **With Member States progressing towards national transposition, we urge governments to follow the example of the Netherlands, which has proposed transposing the Directive without implementing Articles 9 and Annex III at this stage, pending clarification of the outstanding scientific and legal questions.**

**The evidence questioning the current EPR scheme continues to grow.** In June, the European Parliament called for a new impact assessment<sup>1</sup>, including the scientific basis of the Directive and its potential impact on medicine availability and affordability. In September, Advocate General Kokott recommended<sup>2</sup> that the Court of Justice annul Article 9(1)(a) and Annex III of the Directive, identifying shortcomings in the scientific evidence underpinning the selection of the pharmaceutical and cosmetics sectors. Several scientific studies<sup>3</sup> have also challenged the Commission's methodology and assumptions for attributing between 80-100% of EPR fees to the pharmaceutical and cosmetic sectors

The current financing framework of the Directive should be reassessed in light of the need for a scientifically justified, proportionate and evidence-based approach, including exploring alternative financing models, such as the Swiss model<sup>4</sup>, particularly at a time when the EU seeks to strengthen its industrial base, reduce regulatory burdens and improve the availability of medicines.

We urge the Ministers of Environment to call on the European Commission and Member States to address these outstanding concerns before proceeding with the implementation of the current EPR scheme, which could have unintended consequences for the availability and affordability of medicines across Europe and, ultimately, patient care as well as the competitiveness of the pharmaceutical sector.

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<sup>1</sup> [European Parliament Motion for Resolution on UWWTD.](#)

<sup>2</sup> [Advocate General Kokott's opinion.](#)

<sup>3</sup> A list of studies is cited below in the 'Notes for Editors'.

<sup>4</sup> [Medicines for Europe MEMO on Switzerland's approach to quaternary treatment.](#)

## Key studies on micropollutants in wastewater highlighting diverse sources not reflected in the UWWTD EPR impact assessment and feasibility study

- **Thomaidis et al. (2026)**

*Integrating a Comprehensive Analytical Approach for Toxic-Load Assessment in Urban Wastewater: Implications for Data-Driven Regulation* ([link](#))

The study shows that wastewater micropollution reflects diverse societal and economic activities and concludes that toxic-load profiles are site-specific, supporting broader, data-driven and location-specific monitoring and management strategies rather than prioritisation based on a narrow set of substances or sectors.

- **Chonova et al. (2025)**

*Unveiling industrial emissions in a large European river: Insights from data mining of high-frequency measurements*

Monitoring identified **nearly 3,000 chemical compounds relevant for water quality management**, while only **2.8% corresponded to routinely monitored targets**, indicating many substances remain unidentified.

- **Aggerbeck et al. (2024)**

*Non-target analysis of Danish wastewater treatment plant effluent: Statistical analysis of chemical fingerprinting as a step toward a future monitoring tool* ([link](#))

The study identified **4094 unique substances** in wastewater samples, of which **785 chemical structures could be determined** and **451 could be assigned to compound classes**, illustrating the complexity of wastewater composition.

- **Pandey et al. (2024)**

*Nontarget liquid chromatography high-resolution mass spectrometry screening to prioritize unregulated micropollutants that persist through domestic wastewater treatment* ([link](#))

The study identified **734 chemical profiles frequently detected in wastewater effluents**, but only **five substances were quantified through targeted analytical methods**.

- **Kilpinen, K. et al. (2023)**

*Catchment area, fate, and environmental risks investigation of micropollutants in Danish wastewater* ([link](#))

The study detected pesticides such as **terbutryn, propiconazole and tebuconazole** in wastewater treatment plant influents and effluents, with these substances found in **more than 85% of samples** at concentrations between **9 and 156 ng/L**.

- **Montes, R. et al. (2023)**

*Study investigating contaminants in river water, coastal water and wastewater in Spain and Portugal ([link](#))*

The study analysed **93 samples from 33 sites** and detected several pesticides, with **six of eight investigated pesticides showing detection frequencies above 80% in wastewater samples**, and lower average concentrations observed in treated compared with raw wastewater.

- **López-Herguedas, N. et al. (2022)**

*Characterization of the contamination fingerprint of wastewater treatment plant effluents in the Henares River Basin (central Spain) based on target and suspect screening analysis ([link](#))*

The study detected **pesticides such as carbendazim, chlorotoluron and imidacloprid** in wastewater samples collected from several treatment plants in Spain.

- **Lai, A. et al. (2021)**

*Retrospective non-target analysis to support regulatory water monitoring: From masses of interest to recommendations via in silico workflows ([link](#))*

A retrospective non-target analysis of wastewater samples identified **one confirmed and 21 tentative substances**, including manufacturing reagents, adhesives, pesticides and pharmaceuticals, showing the presence of diverse compounds in wastewater.

- **Kaiser, A.-M. et al. (2021)**

*Ozone as oxidizing agent for the total oxidizable precursor (TOP) assay and as a preceding step for activated carbon treatments concerning per- and polyfluoroalkyl substance removal ([link](#))*

Using the TOP assay, the study estimated a **total PFAS concentration of about 840 ng/L in wastewater effluent**, which was **91% higher than values obtained through targeted PFAS analysis**, suggesting the presence of precursor substances not usually monitored.

- **Hollender, J. et al. (2019)**

*High resolution mass spectrometry-based non-target screening can support regulatory environmental monitoring and chemicals management ([link](#))*

The study highlights the need for further development of **non-target analytical methodologies**, including harmonised protocols, improved data infrastructures and appropriate resources to analyse complex mixtures of micropollutants.

## Medicines for Europe

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