



UPPSALA  
UNIVERSITET

## BESLUT

2023-02-14 UFV 2022/2550

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## Reviderat direktiv om rening av avloppsvatten från tätbebyggelse – förslag från europeiska kommissionen (M2022/01945)

### Beslut

Härmed beslutas

- att Uppsala universitet överlämnar nedanstående expertyttrande som sitt svar på rubricerad remiss.

### Bakgrund

Uppsala universitet har beretts möjlighet yttra sig om rubricerat direktiv.

Bifogat yttrande har utarbetats av forskare Sahar Dalahmeh, institutionen för geovetenskaper.

Beslut i detta ärende har i rektors frånvaro fattats av undertecknad prorektor i närvaro av universitetsdirektör Caroline Sjöberg, efter föredragning av fakultetshandläggare Lena Forsell. Närvarande därutöver var akademiombudsman Per Abrahamsson och Uppsala studentkårsordförande Anton Sánchez Sulejmani.

Coco Norén

Lena Forsell



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## YTTRANDE

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### Reviderat direktiv om rening av avloppsvatten från tätbebyggelse – förslag från europeiska kommissionen (M2022/01945)

Uppsala University has been requested to provide comments on the labeled referral. The feedback below has been prepared with researcher Sahar Dalahmeh, Department of Earth Sciences.

Feedback on the Attachment 2 Proposal for the Directive of the European Parliament and of the Council concerning Urban Wastewater Treatment.

#### Comments and amendment proposals

1. The samples shall be taken so that they reflect the pollution during dry weather conditions (Annex 1, p 4).  
While water quality during dry weather conditions might show high concentrations due to low water volume, extreme weather due to climate change is expected to be more frequent in the future and high rainfall and floods are expected to occur. This leads to the discharge of insufficiently treated wastewater. Therefore, it might be good to include sampling during extreme weather conditions.
2. Table 3 shows the requirements for the quaternary treatment of discharges from urban wastewater treatment plants (Annex 1, p 8). It stated that 80% removal of a list of substances is required. The note listing the substances mentioned two categories of the substance: category 1 (substances that can be very easily treated) and category 2 (substances that can be easily disposed of). The limit of 80% removal of substances of category 1 is a very humble (low) limit. By definition, the listed substances are easily degrading, which means that a biological treatment plant will remove them easily. In category 1, diclofenac was identified as easily degrading. However, it is shown in many investigations that biological wastewater treatment plants are not effective in removing diclofenac from wastewater.
3. The list of substances in category 2 (Annex 1, table 3, p 8.) lacks removal limits (or concentration limits) of per and polyfluorinated alkyl acids (PFAAs or PFASs in Swedish).  
Since the environmental quality standards have limits for certain PFASs in



inland water and drinking water intakes, it might be essential to include these limits as discharge limits for treated wastewater effluents.

4. The indicative objective that stormwater overflow, should be no more than 1 % of the annual collected urban wastewater load calculated in dry weather conditions for facilities serving 10 000 PE and above and 100 000 PE and above (Annex 5, p 14).

While this is a very good suggestion it did not give attention to facilities serving less than 10 000 PE which are becoming and will be even more common in the future.