



EurEau

Brussels, 4 March 2024

Ursula von der Leyen
President of the European Commission
Rue de la Loi 200
1049 Brussels, Belgium

Subject: No Green Deal with PFAS: Call to support the Universal PFAS Restriction proposal

Dear President von der Leyen,

The European Green Deal cannot succeed as long as PFAS are produced and used. The European drinking water and wastewater operators united in EurEau call on you to fully endorse the swift and far-reaching ban of these 'forever chemicals'.

EurEau members provide water and sanitation services to 500 million Europeans. The sector's 470 000 dedicated employees generate an annual turnover of €86 billion euros.

According to the European Food Safety Authority (EFSA), PFAS constitute a serious health risk. PFAS are all around us, in the food we eat, the water we drink, the air we breathe, the goods we use. We find them in the seas and lakes we swim in, in soils and in groundwater. Our rainwater is contaminated. Babies already absorb PFAS with their first drop of milk. Even if PFAS use was ended today, historic pollution will continue to expose people and the environment for decades to come.

We cannot pass this pollution on to our children and grandchildren just because we did not have the courage to take decisive action in line with the Precautionary and Control-at-Source Principles, and support innovative alternative solutions.

PFAS represent an insurmountable obstacle on the water sector's journey towards the Green Deal goals.

- ~ PFAS removal from raw drinking water is technologically very challenging (and today practically impossible for wastewater) as well as being resource- and energy-intensive¹, requiring 10-20% additional amounts of raw water¹ and significantly increasing greenhouse gas emissions². Moreover, current technologies do not destroy the PFAS but generate contaminated residues with high concentrations of PFAS which have to be safely disposed. This situation threatens the EU's climate and energy goals as well as water resilience.

¹ Reverse osmosis

² Activated carbon



- ~ PFAS in wastewater streams and sewage sludge hinder the recovery and recycling of nutrients and resources. This means that our goal of having a circular economy that includes closed nutrient and carbon cycles becomes increasingly out of reach. PFAS have become a major stumbling block to water reuse, threatening the survival of farmers in many European regions.
- ~ Today, the majority of drinking water operators who have to remove PFAS, use activated carbon. Much of the coal for this is imported from China, thus, creating an unwanted dependency for our critical infrastructures.
- ~ Most PFAS are very mobile and reach the aquatic environment through multiple pathways. Many water bodies will not comply with the future Environmental Quality Standards for PFAS, putting fishery, tourism, agriculture and water services and, of course, human health at serious risk. The zero pollution goal will remain unachievable for many decades.
- ~ The water sector is fully committed to protecting public health and the environment. However, the significant cost of PFAS removal (and related waste management) are today shouldered by water users, leaving PFAS producers untouched. The affordability of water services is therefore threatened, particularly for low income groups. This runs counter to the EU's 'Leave nobody behind' slogan. The Polluter-Pays Principle must be implemented.

We call on you to fully support the 'universal PFAS restriction' proposal currently in discussion in ECHA that is perfectly in line with the European 'Chemicals Strategy for Sustainability'. The alarming and ubiquitous PFAS contamination requires prompt and determined action in order to protect human health and the environment from their short- and long-term impacts.

Sincerely,

Pär Dalhielm
President

Oliver Loebel
Secretary General

In copy:

- **Maroš Šefčovič, Executive Vice-President European Green Deal, Interinstitutional Relations and Foresight**
- **Thierry Breton, Commissioner Internal Market**
- **Virginijus Sinkevičius, Commissioner Environment, Oceans and Fisheries**
- **Stella Kyriakides, Commissioner Health and Food Safety**