



European Federation of National Associations of
Water and Waste Water Services

Fédération Européenne des Associations Nationales
de Services d'Eau et d'Assainissement

EUREAU position on Combined Sewer Overflows (CSOs)

A word about EUREAU

EUREAU is the European Federation of national associations of water and waste water services. Through 70.000 utilities, our Members collectively provide sustainable water and wastewater services to more than 400 million consumers in Europe. They reflect the full diversity of the European water services sector and represent public, private and mixed operators. As the focus of a European network, EUREAU represents a unique concentration of technical, scientific and managerial knowledge and practical experience in water and wastewater services.

Summary

EUREAU Members are, in many towns and cities, responsible for the construction and maintenance of waste water collection systems. Many existing systems are designed to receive both foul sewage and surface water following rainfall and combined sewer overflows must be provided to prevent overloading of sewers and waste water treatment plants. There are thousands of CSOs in Europe and we recognise that they must be properly protected by upstream measures and managed to prevent flooding and minimise adverse impact on the environment and public health.

EUREAU Members have a responsibility, in many towns and cities, to collect and treat waste water and return it safely to the environment. Existing waste water collection (Sewerage) systems are often 'combined' in that they receive foul sewage from homes and commercial premises as well as surface water following rainfall. After periods of heavy rain a mixture of surface water and foul sewage can be discharged to the environment via CSOs. If these were not provided the overloading of the sewer may result in surface flooding or the receiving treatment works would be overloaded. It is not feasible to construct a waste water collection system to deal with large amounts of surface water.

Discharges from CSOs may impact on the achievement of 'good status' as required by the European Water Framework Directive and also the requirements of other European directives such as bathing waters, shellfish waters and habitat.

Legislation

Requirements of waste water collection systems are set out by Directive 91/271/EEC the Urban Waste Water Treatment Directive. Article 3 and Annex 1

- *limitation of pollution of receiving waters due to storm water overflows*
'(1) Given that it is not possible in practice to construct collecting systems and treatment plants in a way such that all waste water can be treated during situations such as unusually heavy rainfall, Member States shall decide on measures to limit pollution from storm water overflows. Such measures could be based on dilution rates or capacity in relation to dry weather flow, or could specify a certain acceptable number of overflows per year.'

A recent survey of EUREAU Members showed that the above three approaches were currently being used and that all CSOs were generally subject to the conditions of a permit from the environmental regulator. We agree with the appropriate use of all three approaches outlined in the Directive. However, we do not support any proposals that set up target values, such as maximum number and frequency of discharges from each CSO across all member states, as it should be up to the member states to decide which approach is the most appropriate for the local conditions.

Climate Change

There is evidence that climate change is resulting in more frequent and more intense rainfall events and CSO's may therefore operate more frequently. These events are made worse by increasing areas of impermeable surfaces in town and city developments.

Upstream Control

EUREAU believes that where possible storm water and flood control measures should be employed upstream of the sewerage system to prevent and reduce the risks of overloads. We support increasing use of permeable surfaces in urban areas, properly planned and designed rainwater and storm water management systems and urban flood defences that protect surface water sewers and limit the frequency of CSO operation.

Sustainable drainage

EUREAU urges urban planners to consider impacts of development on combined sewerage systems. EUREAU supports the promotion of sustainable drainage systems (SUDS) to reduce or attenuate discharges to piped sewerage and drainage systems. The introduction of such schemes should be considered as part of any development planning process and they will help to reduce the frequency of CSO operation and offer added benefits in reducing diffuse pollution and providing new habitats. It is important here that the costs of these systems are properly allocated.

In addition EUREAU welcomes all policies and proposals to remove surface water from sewerage systems and transfer it via SUDS type systems to watercourses or collect it for re use.

Separate surface water systems must be properly managed to prevent illegal connections.

Sewer asset management

EUREAU believes that effective sewer asset management can reduce the negative impact of infiltration flows and sewer blockages on CSOs.

Mitigation of the environmental impacts of CSOs

EUREAU supports the Urban Pollution Management approach which targets CSO improvements to provide maximum environmental benefit in a catchment.

EUREAU Members are committed to reduce the impact of CSOs on the aquatic environment and to meet the requirements of the WFD and other directives including those for bathing waters and shellfish waters. We expect that, where necessary, improvements to CSOs will be included in WFD Programmes of Measures as an integral part of the River Basin Management Plans.

Storage of Storm Water

Storage of surface water during heavy rain is an important method of mitigating the potential impacts of CSOs. However volumes of water can be so huge that it is neither practicable nor affordable to deal with the worse scenarios. EUREAU also supports the use of real time management of storm flows in sewers in order to maximise capacity and minimise impacts on the water environment.

However it is important to know that such systems require regular and costly maintenance to be continuously ready to operate safely and effectively.

Treatment of Storm Water

Due to the large volumes involved, treatment of CSO discharges can be expensive and require large amounts of energy with its associated carbon emissions. EUREAU supports the use of low energy and low chemical natural systems such as ponds and wetlands which also encourage biodiversity.

Looking to the Future

EUREAU will continue to raise awareness of the difficult issues relating to CSOs and promote initiatives which will reduce their impact.

At the same time our members will continue to plan for climate change and invest in sewerage improvements which are sustainable, practicable and affordable.

EUREAU Members will also continue to invest heavily in the operation and maintenance of the 2.2 million km of existing sewerage systems in Europe and would welcome more research and development to ensure best value and sustainable outcomes.
