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NOTE

From: General Secretariat of the Council
To: Delegations

Subject: AOB for the meeting of EPSCO (Health) of 2 December 2025:
Urban Waste Water Treatment Directive – Cost Study
*- Information from Czechia, supported by Austria, Croatia, Estonia,
Germany, Hungary, Ireland, Latvia, Lithuania, Poland, Portugal, Slovakia,
Slovenia and Sweden*

The Czech Republic, Austria, Croatia, Estonia, Germany, Hungary, Ireland, Latvia, Lithuania, Poland, Portugal, Slovakia, Slovenia and Sweden would like to recall the debate held by Ministers at the EPSCO Council in June 2025, following the Any Other Business item raised by Germany and nine other Member States concerning the impact of extended producer responsibility (EPR) included in the Urban Waste Water Treatment Directive (2024/3019) on the supply of medicinal products in the EU.

As a result of that discussion, the Commission committed to delivering a Cost Study analysis that would assess the implications of the Directive on healthcare systems, in line with the corresponding commitment included in the European Water Resilience Strategy. The Czech Republic, Austria, Croatia, Estonia, Germany, Hungary, Ireland, Latvia, Lithuania, Poland, Portugal, Slovakia, Slovenia and Sweden appreciate the Commission's ongoing efforts in preparing and presenting this study ideally until the end of 2025 to provide planning reliability for Member States and affected sectors. However, we would like to stress the importance of ensuring that the analysis goes beyond environmental and infrastructural costs. It should also provide a thorough evaluation of the financial consequences for national health systems and availability of medicines.

While the introduction of EPR for pharmaceutical residues is expected to enhance environmental protection, it may also have significant repercussions on medicine pricing, reimbursement frameworks, and patient access to essential treatments. These factors must be comprehensively addressed in the Cost Study to support evidence-based policymaking and uphold the dual objectives of environmental sustainability and equitable access to healthcare. Therefore, we would appreciate, if the Cost Study would also include conclusions on the impact of EPR on the availability of medicines.

We stand ready to support the Commission, in particular by facilitating access to relevant data on the pharmaceutical sector, where appropriate and by providing expertise. In our view, the Cost Study should offer clear insights into how EPR could influence medicine pricing across different therapeutic classes. We acknowledge that the findings will be general in nature and will require adaptation to the specific contexts of individual Member States. Nonetheless, a robust and transparent analysis, engaging all relevant stakeholders, will be crucial for guiding future legislative decisions and maintaining the resilience and affordability of our healthcare systems.
