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1 **Can source control of pharmaceuticals decrease the investment**
2 **needs in urban wastewater infrastructure?**

3 Lluís Corominas^{1,2*}, Pau Gimeno¹, Carlos Constantino³, Peter Daldorph³
4 and Joaquim Comas^{1,2,4}

5 ¹ ICRA, Catalan Institute for Water Research, Carrer Emili Grahit 101, E-17003 Girona, Spain

6 ² Universitat de Girona, Girona, Spain

7 ³ Atkins, Atkins, (The Hub) 500 Park Avenue, Aztec West, Almondsbury, Bristol, BS32 4RZ, UK

8 ⁴ LEQUiA, University of Girona, Campus Montilivi, Girona, 17071, Spain

9

10 **Corresponding author:** Lluís Corominas (lcorminas@icra.cat); ICRA, Catalan Institute for

11 Water Research, Carrer Emili Grahit 101, E-17003 Girona, Spain

12

13 **Keywords**

14 Modelling, fate, transport, tertiary treatment, Priority Substances, WWTP, river, green

15 pharmacy

16

17 **Abstract**

18 The source control of pharmaceuticals involves influencing the everyday consumption volume
19 and compound choice. This paper evaluates how source control contributes to protecting the
20 environmental health and decreasing the investment needs in urban wastewater infrastructure.
21 Different levels of reduction in diclofenac consumption (as recommended by the European
22 Medicines Agency) compensated by equivalent increases in naproxen consumption (a less
23 environmentally harmful compound) are evaluated. The different loads of compounds are fed
24 into a microcontaminant fate and transport model of the Llobregat catchment (Spain) to assess
25 the investment needs in tertiary treatment to reach diclofenac and naproxen concentrations
26 below environmental quality standards. The results show that, despite the implementation of
27 source control measures, tertiary treatment upgrades are still required in every scenario
28 evaluated. Even though source control of pharmaceuticals decreases the investment needs in
29 urban wastewater infrastructure, apparent concentrations reductions (i.e. statistically
30 significant differences relative to the reference situation) are only observed in drastic
31 substitutions of diclofenac by naproxen (a reduction in the total diclofenac consumption by 73%
32 and a corresponding increase in naproxen consumption). The results also show that Spain is well
33 on track with regards to the substitution of diclofenac by naproxen (among the top 5 in Europe),
34 and this paper shows how positive this substitution can be for the environment.

35 **Abbreviations**

36 defined daily dose (DDD); environmental quality standard (EQS); Microcontaminant Fate and
37 Transport Model (MFT); non-steroidal anti-inflammatory (NSAID); over-the-counter (OTC);
38 predicted no-effect concentration (PNEC); wastewater treatment plant (WWTP).

39

40

41

42 **1. INTRODUCTION**

43 Individual households are among the main sources of pharmaceutical release into the
44 environment, particularly for human medicines in industrialized countries (Ebele et al., 2017).
45 This release poses a threat to freshwater organisms (Richardson et al., 2018) as well as to the
46 human health at environmentally relevant concentrations. Of the multiple possible approaches
47 that can contribute to reducing the presence of pharmaceuticals in freshwater ecosystems,
48 source control is recognized as having a large potential for reduction (Roig, 2010). Source control
49 consists of finding solutions before pharmaceuticals are released into the environment by
50 addressing the issues of the production, prescription, distribution and use of medicines. This
51 paper focuses on influencing the everyday consumption volume and compound choice as two
52 of the potential source-control measures suggested in Ternes and Joss (2007). The reduction in
53 the consumption volume involves modifications in the prescription of medicines (lower dosages)
54 and reduction in the over-the-counter (OTC) dispensing levels in pharmacies through public
55 awareness (Daughton & Sue Ruhoy, 2013; Daughton, 2014; Interreg IV B Nopills project, 2015).
56 The compound choice involves the substitution of medical prescriptions towards more
57 environmentally benign drugs, that is, the prescription of pharmaceuticals that are better
58 removed in conventional wastewater treatment plants (WWTPs) and pose less harmful effects
59 to aquatic life and drinking water (Kümmerer, 2009). In addition to the consumption volume and
60 compound choice, this paper also discusses how green or sustainable pharmacy represents a
61 safe long-term solution for the environment (Kummerer et al., 2000; Sanderson, 2011). Green
62 pharmacy applies to the manufacture of a new generation of pharmaceuticals that are i)
63 environmentally less harmful while maintaining the pharmacological properties and therapeutic
64 efficacy of molecules, ii) the production of new pharmaceuticals with similar therapeutic effects
65 at lower doses, or iii) that are completely biodegraded in the human body, thereby minimizing
66 the excretion of metabolites.

67 Even though source-control measures must be at the forefront (Courtier et al., 2019), end-of-
68 pipe measures are still required to meet environmental quality standards (EQSs) for
69 pharmaceuticals. These end-of-pipe measures involve the upgrade of WWTPs with tertiary
70 treatment (e.g., ozonation followed by sand filtration). Hence, the future of environmental
71 protection involves the combination of source control with end-of-pipe measures (Eggen et al.,
72 2014; Hillenbrand et al., 2014; van Wezel et al., 2017; Kümmerer *et al.*, 2018). The cost and
73 effectiveness of end-of-pipe measures to reach specific EQS has already been evaluated at a
74 catchment level using model-based approaches (e.g., Gimeno et al., 2017; Kehrein et al., 2015;
75 Ort et al., 2009). However, the effectiveness of source control measures in reducing needs for
76 WWTP upgrading has been poorly addressed in the literature. To the best of our knowledge,
77 Hillenbrand et al. (2014) is the only existing study on this topic; they concluded that a reduction
78 by 20% in the consumption of 3 pharmaceuticals in a German catchment did not contribute to
79 a significant reduction in the concentrations below the PNEC in freshwater ecosystems. Only
80 upgrading every WWTP larger than 10,000 PE (Population Equivalents), regardless of whether
81 the pharmaceutical consumption decreased or not, resulted in reductions in the concentrations
82 below the PNEC in almost the entire basin. However, to date, no study has assessed whether
83 pharmaceutical substitution by less environmentally harmful substances is an effective measure
84 to significantly avoid WWTP upgrades in a catchment. The novelty of this paper is on addressing
85 source-control of pharmaceuticals with the definition of realistic substitution scenarios based
86 on EU databases on pharmaceuticals consumption, and their evaluation using state-of-the art
87 fate and transport models. In this study, diclofenac is selected as the more environmentally
88 harmful pharmaceutical and naproxen as the less environmentally harmful equivalent. The
89 Llobregat river catchment (North East Iberian Peninsula) is the selected case study.

90 **2. MATERIALS AND METHODS**

91 **2.1 The Llobregat river basin**

92 The study area is the Llobregat river basin, which is the second longest river in Catalonia (North
93 East of Iberian Peninsula). The main axis of the river extends 165 km from the Pyrenees to the
94 Mediterranean Sea, draining an area of 4,948 km², and the river has two main tributaries, the
95 Cardener and Anoia rivers. The hydrology of the Llobregat river is characterized by a highly
96 variable flow that is strongly influenced by seasonal rainfall. According to 2017 data from the
97 Catalan Water Agency, the mean annual bulk precipitation is 3,330 hm³, and the river has an
98 annual average bulk discharge of 693 hm³. The Llobregat river basin includes 56 WWTPs (54
99 conventional activated sludge, 1 aerated lagoon and 1 membrane bioreactor, with a PE ranging
100 from 100 to 280,000), which collect and treat wastewater from 1,1 M inhabitants and discharge
101 to the Llobregat river basin (Figure 1).

102 ***Figure 1. The Llobregat river basin, main tributaries (Cardener and Anoia) and location of the***
103 ***WWTPs. The WWTPs are ranked based on the population equivalent served.***

104 **2.2 Diclofenac and naproxen**

105 **2.2.1 Characteristics**

106 Diclofenac is a common non-steroidal anti-inflammatory (NSAID) and anti-rheumatic drug. The
107 average defined daily dose (DDD) for diclofenac used as an anti-inflammatory and anti-
108 rheumatic drug in adults is 0.1 grams for any administration route (oral, parenteral or rectal;
109 WHO, 2007). Diclofenac is dispensed in pharmacies with a prescription or OTC in the form of
110 pills, eye drops, suppositories or a gel. Among NSAIDs, diclofenac increases the risk of
111 cardiovascular events compared to other NSAIDs (McGettigan & Henry, 2013). The EQS
112 proposed in Europe for diclofenac ranges from 10 ng·L⁻¹ (European Medicines Agency, 2006) to
113 100 ng·L⁻¹ (European Commission, 2012).

114 Naproxen is also an NSAID and anti-rheumatic drug. The average defined DDD for naproxen used
115 as an anti-inflammatory and anti-rheumatic drug in adults is 0.5 grams (5 times higher than
116 diclofenac; WHO, 2007). Naproxen is dispensed in pharmacies with a prescription or OTC in the
117 form of pills. Among the NSAIDs, naproxen is associated with the lowest cardiovascular risk but

118 increased gastrointestinal side effects are possible (Baigent et al., 2013). The EQS proposed in
119 Europe for naproxen are also higher than diclofenac because they range from 640 ng·L⁻¹ (LIF,
120 2005) to 1,700 ng·L⁻¹ (Ecotox centre, 2017).

121 Additional information regarding the excretion and removal of diclofenac and naproxen in
122 WWTPs and rivers can be found at SI, section 1.

123 **2.2.2 Total consumption (purchased with a prescription and OTC) of diclofenac and naproxen**

124

125 IQVIA (2018) provided the yearly total amount (kg) of diclofenac and naproxen that the
126 wholesalers and the manufacturers supplied directly to pharmacies and hospitals in European
127 countries from 2006 to 2016. We assumed that all of the amount that was supplied to the
128 pharmacies was sold to customers in the same year and that the customers consumed 100% of
129 the medicines. Hence, the values include the total amount of drugs purchased with a
130 prescription and OTC. We standardized the quantity of pharmaceuticals purchased as DDD/1000
131 inhab/day using the average DDD for diclofenac and naproxen (0.1 g. and 0.5 g., respectively;
132 WHO, 2007) and the population in Europe from 2006 to 2016 (World Bank, 2018).

133 The lowest consumptions of diclofenac in 2016 are found in the UK and the Netherlands (3.4
134 and 7.6 DDD·1000 inhab⁻¹·day⁻¹, respectively), and the highest values are in Estonia and Austria
135 (35 and 33 DDD·1000 inhab⁻¹·day⁻¹, respectively, Figure 2a). In 2011, the European Medicines
136 Agency recommended decreasing the prescription of diclofenac in patients with a high
137 cardiovascular risk (EMA, 2012, 2013). Certain countries show a positive decline in diclofenac
138 daily dosages between the period of 2011 to 2016 (Figure 2b); UK shows the largest reduction
139 in diclofenac consumption (a reduction of 6.4 DDD·1000 inhab⁻¹·day⁻¹), followed by Ireland (4.5),
140 Slovenia (4.5) and Spain (2.5). Other countries show a lower reduction or even an increase in the
141 consumption of diclofenac. In certain cases, the decrease in diclofenac consumption coincides
142 with the increase in naproxen consumption (27, 17 and 14 DDD·1000 inhab⁻¹·day⁻¹ in Slovenia,
143 UK and Spain, respectively, Figure 2c); for these cases we assume that diclofenac is substituted

144 by naproxen (we are aware of the fact that substitution can be by a combination of NSAIDs).
145 This was the case for UK, which shows the highest degree of substitution of diclofenac by
146 naproxen, followed by Ireland, Norway, Romania and Spain (the degree of substitution
147 calculated as the share of Naproxen vs the sum of naproxen and diclofenac in 2016 minus the
148 share in 2011, Figure 2d). Other countries showed low or null levels of substitution due to a
149 continued increase in diclofenac consumption or due to the potential substitution of diclofenac
150 by another pharmaceutical (e.g., ibuprofen).

151

152 ***Figure 2. Diclofenac and naproxen consumption in different European countries and the level***
153 ***of substitution***

154 Specific data for the prescribed amount of diclofenac and naproxen from 2000 to 2016 in Spain
155 was provided by the Spanish agency of pharmaceuticals (AEMPS, 2014, 2017). This allowed to
156 estimate the yearly diclofenac and naproxen purchased OTC in Spain as the difference between
157 the total (IQVIA) and the prescribed amount (AEMPS). Then, the decreasing and increasing
158 trends from 2006 to 2016 for the total and prescribed consumption of diclofenac and naproxen,
159 respectively, can be observed (Figure S1).

160 **2.3 The Microcontaminant Fate and Transport Model (MFT)**

161 The model developed in Gimeno et al. (2017) was used to describe the fate and removal of
162 diclofenac and naproxen in the Llobregat river basin. The tool integrates 3 submodels: 1) a
163 substance-human consumption and excretion model, which estimates the diclofenac and
164 naproxen loads that reach the influents of WWTPs; 2) a WWTP model, which estimates the
165 effluent loads; and 3) a river model, which estimates the loads in every river stretch. Each
166 submodel has a key parameter: 1) F is a lumped factor that includes the fraction of the diclofenac
167 and naproxen parent compound that is excreted to toilets, discharged directly via sinks, washed
168 off of skin or clothes and degraded in sewers; 2) k_{WWTP} is the reaction rate constant that
169 incorporates the processes by which diclofenac and naproxen are eliminated in WWTPs; and 3)

170 k_{river} is the reaction rate constant that represents the natural diclofenac and naproxen
171 elimination in rivers. The equations involved in each sub-model are included in the Supporting
172 Information – section 3.

173 The parameter values for diclofenac and naproxen were calibrated as in Gimeno et al. (2017)
174 using a Bayesian inference approach and measurements of both pharmaceuticals in the river
175 and in WWTPs (Supporting Information- section 5). Experimental data include influent and
176 effluent concentrations of 5 WWTPs over the period from 2006 to 2009 (Gros et al., 2007; Gros
177 et al., 2010; Jelic et al., 2011), the consumption of diclofenac and naproxen during same periods,
178 and operational data (activated sludge solids concentrations and hydraulic retention time) from
179 the same WWTP and river flows and velocities during September 2010 (when the sampling
180 campaign for measuring the naproxen level in WWTPs and rivers was conducted).

181 Hence, the MFT model predicts the concentrations of diclofenac and naproxen in every river
182 stretch, accounting for the uncertainty in the calibrated model parameters. The model predicts
183 three different concentrations of diclofenac and naproxen: worst, median and best probable
184 concentrations. The worst probable concentrations of diclofenac and naproxen, i.e. the highest
185 probable concentrations, are simulated using the 97.5th percentile of F and the 2.5th percentiles
186 of k_{WWTP} and k_{river} . The best probable concentrations, i.e. the lowest probable concentrations, are
187 simulated using the 2.5th percentile of F and the 97.5th percentiles of k_{WWTP} and k_{river} . The median
188 concentrations are simulated using the median value of the three parameters.

189 **2.4 Source control scenarios**

190 We evaluated the reduction in the diclofenac consumption volume and its equivalent
191 substitution by naproxen. Different levels of diclofenac consumption volume reduction were
192 evaluated based on real data on the amounts of diclofenac and naproxen purchased with a
193 prescription and OTC in Spanish pharmacies and based on grey literature. We assumed that all
194 the amounts purchased were consumed in the same year by the customers (we used the

195 amounts purchased and amounts consumed interchangeably). The following four scenarios
196 were evaluated (Table 1):

197 Scenario 1 or reference scenario. The real consumption volumes of diclofenac and naproxen in
198 2010, just before the implementation of the European Medicines Agency recommendation for
199 decreasing diclofenac prescriptions.

200 Scenario 2. The real consumption volumes of diclofenac and naproxen in 2016, four years after
201 the European Medicines Agency recommendation. The diclofenac consumption with a
202 prescription had been reduced to 3.2 DDD·1000 inhab⁻¹·day⁻¹ (2 times smaller) and the naproxen
203 consumption had increased up to 9.9 DDD·1000 inhab⁻¹·day⁻¹ (almost 2 times higher), compared
204 to scenario 1. Although the amounts of both pharmaceuticals purchased OTC increased in S2,
205 the total amount of diclofenac purchased in scenario 2 still decreased by 17% compared to
206 scenario 1. With scenarios 1 and 2, we can evaluate the environmental effects (and potential
207 investment cost changes) due to the implementation of the European Medicines Agency
208 recommendation in 2011.

209 Scenario 3. The reduction in the diclofenac consumption through prescription went down to 1.9
210 DDD·1000 inhab⁻¹·day⁻¹, with the equivalent substitution by naproxen. These values
211 corresponded to the maximum potential change in the diclofenac consumption of naproxen for
212 the Netherlands as reported in Grinten et al. (2016). The volume of naproxen purchased with
213 prescriptions increased by 1.3 DDD·1000 inhab⁻¹·day⁻¹. The amounts of diclofenac and naproxen
214 purchased OTC remained the same as in scenario 2. Thus, the total amount of diclofenac
215 purchased in scenario 3 was 27% smaller than that in scenario 1.

216 Scenario 4. The reduction in the total diclofenac consumption was down to 3.6 DDD·1000 inhab⁻¹·
217 day⁻¹, which corresponded to the consumption level in the UK in 2016, the lowest consumption
218 level observed in Europe (IQVIA, 2018). We kept the prescribed diclofenac consumption at 1.9
219 DDD·1000 inhab⁻¹·day⁻¹ (the same as in scenario 3) but reduced the OTC consumption to 1.7
220 DDD·1000 inhab⁻¹·day⁻¹. The decrease in the OTC diclofenac consumption was compensated by

221 an equivalent increase in the OTC naproxen consumption. Hence, the total amount of diclofenac
222 purchased in scenario 4 decreased by 73% compared to scenario 1.

223 ***Table 1. Scenarios for the consumption of diclofenac and naproxen.***

224

225 **2.5 Optimization of the number of WWTPs requiring an upgrade**

226 We used the Non-Sorting Genetic Algorithm NSGA-II (Deb et al., 2002) optimizer coupled to the
227 MFT model as described in Gimeno et al. (2018) to obtain the optimal set of WWTPs that should
228 be upgraded in the Llobregat basin to decrease the diclofenac and naproxen concentrations in
229 the rivers. Two objective functions were defined: the minimization of the total EQS exceedance
230 in the entire Llobregat basin and minimization of the total cost of the upgrades (the annual
231 investment and operational cost). Ozonation was selected as the upgrade technology because
232 it removes diclofenac and naproxen almost completely (close to 99%) at low ozone doses (Huber
233 et al., 2005). The function that calculated the ozonation costs based on the treated flow and
234 population equivalents was extracted from Gimeno et al. (2018). We assumed that ozonation
235 could only be installed at WWTPs larger than 5000 PE (18 of 56 WWTPs in the catchment).
236 Therefore optimization only searches for the optimal sub-set of WWTPs (among this set of 18)
237 to be upgraded. Installing ozonation in WWTPs smaller than 5000 PE is not feasible because
238 ozonation requires qualified permanent staff for their operation (Rossi et al., 2013). Moreover,
239 the sum of PE corresponding to the WWTPs smaller than 5000 PE only represents 6% of the total
240 PE in the Llobregat basin.

241 We ran the optimizer separately for diclofenac and for naproxen. The optimization for each
242 compound was conducted 24 times, as a combination of four scenarios of the total consumption
243 (section 2.4), three levels of uncertainty in the predicted concentrations (worst, median and best
244 probable concentrations), two EQS levels (10 and 100 ng·l⁻¹ for diclofenac; 640 and 1,700 ng·l⁻¹
245 for naproxen) and two river flow conditions (the average flows in September 2010 and
246 environmental or minimum river flows as defined in Gimeno et al., 2018). Rice and Westerhoff

247 (2017) demonstrates the relevance of wastewater discharges during low flow periods. For every
248 optimization, we assumed the same river stretch configurations and WWTP operational
249 variables as in Gimeno et al. (2017).

250 In the results section, we compare the investment costs of scenarios 2 to 4 with respect to
251 scenario 1. Since uncertainty is considered, the result for each scenario is represented by a
252 dispersion. We consider that an apparent reduction in the investment costs of a particular
253 scenario with respect to scenario 1 is achieved if these dispersions do not overlap, i.e. there are
254 statistically significant differences relative to the reference situation. The latter means that the
255 cost of the upgrades in a particular scenario for the worst probable concentrations of diclofenac
256 is lower than the cost in the reference scenario (scenario 1) for the best probable
257 concentrations.

258 **3. RESULTS**

259 **3.1 MFT model performance**

260 After the Bayesian calibration of the integrated MFT model (Section 5 in SI), we obtained the
261 posterior probability distributions for the parameters F (lumped factor to estimate loads at the
262 WWTP influents), k_{WWTP} (rate of degradation in WWTP) and K_{river} (rate of degradation in rivers)
263 for both naproxen and diclofenac (Section 6, 7 and 8 in SI for details). The calibrated parameters
264 for naproxen and diclofenac are calculated as the median and the 2.5th and 97.5th percentiles
265 of the probability distributions (Table 2).

266

267 ***Table 2. Calibrated model parameters for naproxen and diclofenac (latter one from Gimeno et***
268 ***al., 2017).***

269 The calibrated model accurately predicts the naproxen loads measured at 9 points along the
270 Llobregat River ($r^2 = 0.88$), we obtained a very good fit between the measured and predicted
271 naproxen loads in the rivers (Figure 3). The predicted influent loads also matched the measured
272 loads well at the Igualada and Manresa WWTPs. However, the model overestimated the

273 measured effluent loads. The latter can be justified by either probable errors in the sampling
274 campaign at the WWTPs or in the estimation of the inhabitants connected to these WWTPs
275 (Gimeno et al., 2017). Indeed, the measured effluent concentration at the Igualada WWTP was
276 lower than any measured effluent concentration at the other 5 WWTPs (Gros et al., 2007; Gros
277 et al., 2010; Jelic et al., 2011), which were used to estimate the prior distributions of F and k_{WWTP} .

278

279 ***Figure 3. Model-predicted versus measured loads of naproxen at the river sampling points***
280 ***(black symbols) and in the influents and effluents of the Igualada and Manresa WWTPs***
281 ***(coloured symbols). Each prediction consists of 3 simulated values (circle = median loads, and***
282 ***bars = worst and best probably loads). Points located on the bisector indicate a perfect fit***
283 ***between the predicted and measured values. Predictions lie within the dashed lines parallel to***
284 ***the bisector if they do not deviate by more than ± 50 from the corresponding measured value.***

285

286 **3.2 Effect of a decrease in diclofenac consumption on the WWTP upgrades**

287 Overall, the costs of the WWTP upgrades decreased as the total diclofenac consumption
288 decreased (Figure 4 and Figure 5). However, the apparent reductions in the number of WWTP
289 upgrades and costs were only achieved when the consumption of diclofenac purchased with a
290 prescription and OTC was drastically reduced by 73% (scenario 4) compared to the baseline
291 (scenario 1). This is consistent for both EQS and average flows (Figure 4). For the average flows
292 (Figure 4), this consideration translates into a reduction in the number of WWTP upgrades from
293 14 (scenario 1) down to 8 (scenario 4) for an EQS of $10 \text{ ng}\cdot\text{L}^{-1}$ and from 5 (scenario 1) down to 2
294 (scenario 4) for an EQS of $100 \text{ ng}\cdot\text{L}^{-1}$. For the minimum flows (Figure 5), the apparent reductions
295 in the number of WWTP upgrades were only achieved for an EQS of $100 \text{ ng}\cdot\text{L}^{-1}$. For the EQS of
296 $10 \text{ ng}\cdot\text{L}^{-1}$, every WWTP required an upgrade for the worst concentrations of diclofenac (even for
297 scenario 4), so there was no apparent reduction in the WWTP upgrades or in the costs. Reducing
298 the consumption of diclofenac by only reducing the prescriptions (scenarios 2 and 3) did not

299 lead to apparent reductions in the WWTP upgrades and costs compared to the baseline
300 (scenario 1) for both flow conditions. Great savings were obtained when reducing both the
301 diclofenac prescriptions and OTC consumption (scenario 4): 4.2 M€·year⁻¹ for an EQS of 10 ng·L⁻¹
302 ¹, average flows and median values and 4.3 M€·year⁻¹ for an EQS of 100 ng·L⁻¹, minimum flows
303 and median values. Therefore, source control became more relevant for lower levels of the EQS
304 during average flows and for higher EQS values during minimum flows.

305

306 **Figure 4. Number of WWTP upgrades (shown in brackets) and upgrading costs optimized to**
307 **avoid an EQS exceedance of 10 and 100 ng·L⁻¹, respectively, for diclofenac and 640 and 1,700**
308 **ng·L⁻¹, respectively, for naproxen for the average flows. These values are calculated for**
309 **scenarios S1, S2, S3 and S4 for the consumption of diclofenac and naproxen as defined in Table**
310 **3. The number of WWTP upgrades and the costs are optimized for the median, worst and best**
311 **concentrations of diclofenac and naproxen.**

312

313 **Figure 5. Number of WWTP upgrades (shown in brackets) and upgrading costs optimized to**
314 **avoid an EQS exceedance of 10 and 100 ng·L⁻¹, respectively, for diclofenac and 640 and 1,700**
315 **ng·L⁻¹, respectively, for naproxen for the environmental flows. These values are calculated for**
316 **scenarios S1, S2, S3 and S4 for the consumption of diclofenac and naproxen as defined in Table**
317 **3. The number of WWTP upgrades and the costs are optimized for the median, worst and best**
318 **concentrations of diclofenac and naproxen.**

319

320 **3.2 Effect of an increase in the naproxen consumption on the WWTP upgrades.**

321 The substitution of diclofenac by naproxen in scenarios 2 and 3 did not lead to an increase in the
322 number of WWTPs to be upgraded or the costs. Figure 4 and Figure 5 show that the limiting
323 compound for upgrading WWTPs was diclofenac, regardless of the EQS or the river flow
324 condition. If the decision would be based only on the naproxen concentrations, only 1 WWTP at

325 most in scenario S3 would require an upgrade for the EQS of 1,700 ng·L⁻¹ and between 3 (average
326 flows) and 8 WWTPs (minimum flows) for an EQS of 640 ng·L⁻¹ (considering the median values).
327 The equivalent substitution in scenario 4 indicated an increase in the number of WWTPs to be
328 upgraded for one particular case (an EQS of 100 ng·L⁻¹ for diclofenac and EQS of 640 ng·L⁻¹ for
329 naproxen). This situation involved 1 additional WWTP to be upgraded under average flows and
330 3 additional WWTPs for environmental flows, on top of the upgrades required by the diclofenac
331 EQS evaluations (2 and 6 WWTPs upgraded, respectively). The set of WWTPs requiring an
332 upgrade for each EQS, uncertainty in the concentrations and river flow condition are included in
333 the Supporting Information section 9. Interestingly, for the median and the best concentrations,
334 the sets of WWTP upgrades required to reduce the diclofenac concentrations always contained
335 WWTP upgrades to reduce the naproxen concentrations and vice versa. For the worst
336 concentration, this finding held true except for scenario S4 and the minimum flows, in which the
337 naproxen and diclofenac concentrations required the upgrade of different numbers of WWTPs
338 (11 and 10 WWTPs, respectively). Thus, a combination of both solutions resulting in the upgrade
339 of 12 WWTPs would be needed to reduce the EQS exceedance of diclofenac and naproxen
340 concentrations together.

341 **3.3 Substitution of pharmaceuticals and green pharmacy (sensitivity of the DDD and the** 342 **excretion factor)**

343 We used the integrated MFT model to evaluate the influence of green pharmacy on the urban
344 water infrastructure upgrades. We assumed that diclofenac was substituted with a new drug
345 with a DDD of 0.1 g (instead of 0.5 g for naproxen). Considering that the new drug had the same
346 excretion factor, WWTP and river removal efficiencies as naproxen, only 2 WWTPs (instead of
347 5) would require an upgrade for the worst concentration, average river flow and EQS of 640 ng·L⁻¹
348 ¹ in scenario 4 (the scenario that required a higher number of WWTP upgrades) (see Figure 4).
349 When the evaluation involved environmental flows, only 5 WWTPs would require an upgrade as
350 opposed to 11 WWTPs. Conversely, we assumed that diclofenac was substituted by a new drug

351 with the same DDD, WWTP and river removal efficiency as naproxen but with an excretion factor
352 of 7% (no glucuronide compounds would be excreted). For the worst concentration, the average
353 flow and an EQS of $640 \text{ ng}\cdot\text{L}^{-1}$ in scenario 4, again only 2 WWTPs would require an upgrade as
354 opposed to 5 WWTPs. For the environmental flows, 7 WWTP upgrades would be required.
355 Therefore, efforts should not concentrate only in upgrading WWTP but also on designing
356 pharmaceuticals in such a way that WWTP and the environment can cope with the challenge of
357 pharmaceuticals (Kümmerer *et al.*, 2019).

358 **4. DISCUSSION**

359 **4.1. Source control of pharmaceuticals and decrease in investment needs in urban wastewater** 360 **infrastructure**

361 Despite the implementation of source control measures, end-of-pipe upgrades were required in
362 every scenario evaluated. The source control of pharmaceuticals decreased the investment
363 needs in urban wastewater infrastructure, but the apparent reductions (when accounting for
364 the model uncertainty) were only observed in the drastic substitutions of diclofenac by naproxen
365 (a reduction in the total diclofenac consumption by 73% and a corresponding increase in the
366 naproxen consumption). Looking further into detail, we estimated that the required decrease in
367 the consumption to obtain apparent reductions in the investment costs with respect to scenario
368 1 would be 60% for the average flows and an EQS of $100 \text{ ng}\cdot\text{L}^{-1}$ and 90% for the environmental
369 flows and an EQS of $10 \text{ ng}\cdot\text{L}^{-1}$. The Llobregat River is a typical Mediterranean watercourse with
370 an average flow in the mouth of $20 \text{ m}^3\cdot\text{s}^{-1}$. The magnitude of wastewater effluents in the whole
371 basin is approximately $3 \text{ m}^3\cdot\text{s}^{-1}$. The overall low dilution during average flows in the Llobregat
372 explains the high concentrations of pharmaceuticals that significantly exceeded the EQS in
373 particularly dry stretches. This finding justifies why a considerable decrease in diclofenac
374 consumption was needed to avoid the upgrade of WWTPs and, hence, achieve the apparent
375 reductions in the number of WWTP upgrades.

376 The results of this study are in line with the outcomes by Hillenbrand et al. (2014), where a 20%
377 reduction in diclofenac consumption (on top of the upgrade of every WWTP with a level above
378 50,000 PE in the Neckar river basin, Germany) did not lead to a significant improvement in the
379 EQS exceedance. Although the average diclofenac consumption in the Neckar river basin in 2016
380 was more than twice the consumption in the Llobregat river basin (25 DDD·1000 inhab⁻¹·day⁻¹
381 and 11 DDD·1000 inhab⁻¹·day⁻¹, respectively; IQVIA, 2018), the average flow in the mouth (145
382 m³·s⁻¹; Gisen et al., 2017) was approximately 10 times higher compared to the Llobregat. Hence,
383 assuming a similar magnitude of wastewater effluents (a similar population was connected to
384 the WWTPs in both basins), considerable reductions in the consumption of diclofenac were
385 needed to significantly avoid WWTP upgrades in both catchments with high and low flows. In
386 any case, this result still required a model-based evaluation because the optimal number of
387 WWTPs that required an upgrade is a catchment-specific problem (Gimeno et al., 2018).

388 **4.2 Degree of the substitution of diclofenac by naproxen in Spain compared to other European** 389 **countries**

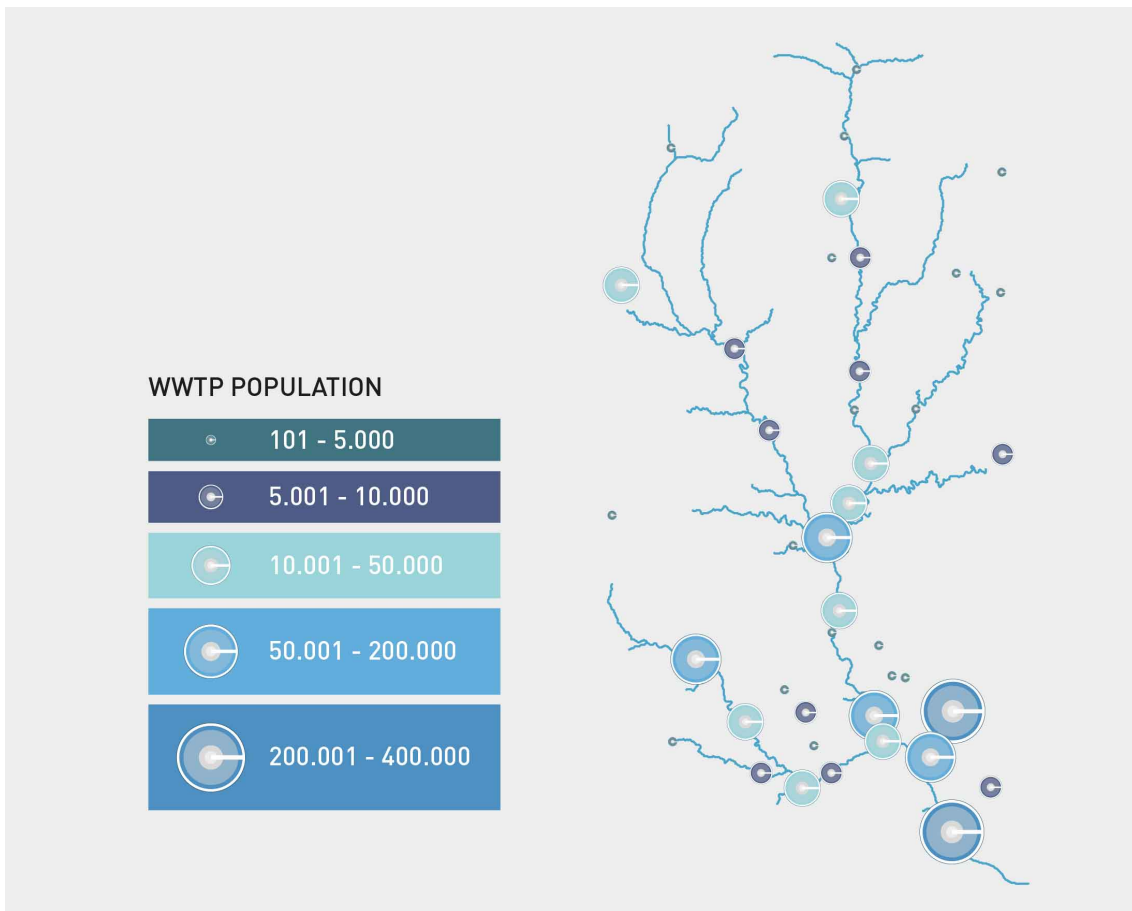
390 Spain is among the top 5 countries in Europe substituting diclofenac (either by naproxen or by
391 other NSAIDs). The results show that further substitution (down to UK levels, as described in
392 scenario 4 from the results section) would lead to enhanced water quality and would imply a
393 reduction in the investment needed to fulfil EU legislation in freshwater ecosystems. Actions can
394 be taken on the physician side to reduce the consumption of “environmentally harmful”
395 pharmaceuticals. There are already certain initiatives that aim to include the environmental
396 aspects of the physician decision when prescribing two equivalent pharmaceuticals (e.g., at the
397 national level in Sweden, LIF 2005). As summarized in Courtier et al. (2018), Van Rensselaer
398 Potter’s original conceptualization of bioethics can be used to balance the obligations of
399 clinicians to protect the individual, public, and environmental health Balch et al. (2017). Actions
400 can be taken on the over-the-counter side by enhancing patient awareness. Particularly the
401 compound choice, i.e., opting for the environmentally friendly choice in case of alternative

402 compounds being available with a comparable effectiveness, can be addressed through
403 classification and labelling schemes. In addition, patient awareness can be achieved by ensuring
404 that pharmaceutical expertise is provided to patients when purchasing OTC diclofenac
405 (Netherlands strategy; Interreg IV B - No-pills project, 2015) or limiting the diclofenac availability
406 as prescribed only (UK strategy; Medicines and Healthcare products Regulatory Agency, 2015).
407 The commercial advertising of naproxen might also have encouraged the increase in naproxen
408 OTC consumption in the UK, which accounts for the highest consumption of this pharmaceutical
409 in Europe. A reduction in the OTC consumption of diclofenac would be especially effective in
410 countries showing high OTC consumption rates, e.g., in Spain and Sweden. For instance, the
411 diclofenac purchased OTC represented 75% of the total consumption in Spain in 2016 (IQVIA,
412 2018; AEMPS, 2017), and 70% in Sweden in 2015 (IQVIA, 2018; Eriksen et al., 2017). Finally,
413 initiatives in the direction of green pharmacy are extremely limited because of the low interest
414 of the industry to modify existing molecules (expensive and without compensation) as well as
415 the trend of new-generation molecules such as monoclonal antibodies (Roig and Touraud,
416 2010).

417 **5. CONCLUSIONS**

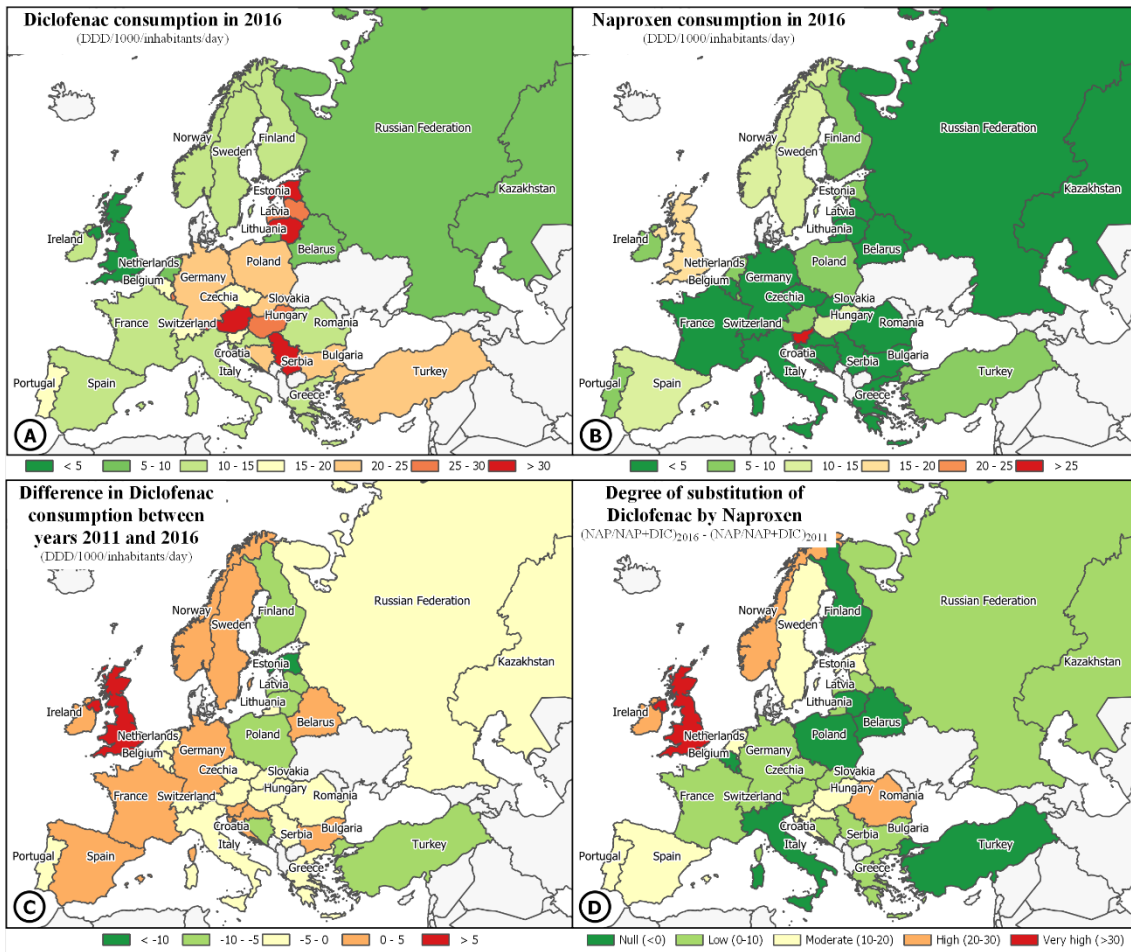
418 We have illustrated that source control can contribute to protecting the environmental health
419 and decreasing the investment needs in urban wastewater infrastructure. Despite the
420 implementation of source control measures, tertiary treatment upgrades are required in every
421 scenario evaluated. For the particular case of the Llobregat catchment, the substitution of
422 diclofenac by naproxen would potentially decrease the investment needs by approximately 4
423 M€·year⁻¹ in urban wastewater infrastructure to keep the concentrations of both compounds
424 below their respective environmental quality standards. This paper also shows that Spain is well
425 on track with regards to the substitution of diclofenac by naproxen (among the top 5 in Europe)
426 following the recommendations of the European Medicines Agency.

427



432 Figure 1. The Llobregat River catchment, main tributaries (Cardener and Anoia) and location of

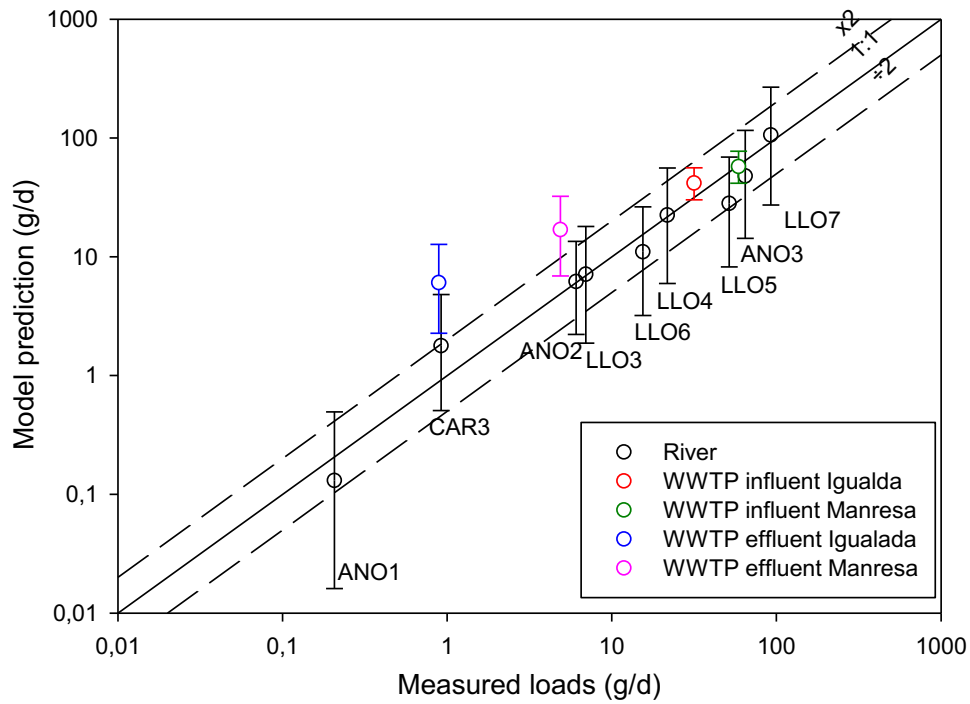
433 WWTPs. WWTPs are ranked based on the population equivalent served.



435

436 Figure 2. Diclofenac and naproxen consumption in different European countries and level of
 437 substitution (calculated as the share of NAP with respect to the sum of NAP and DIC in 2016
 438 minus the share in 2011).

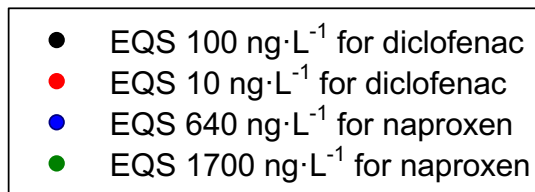
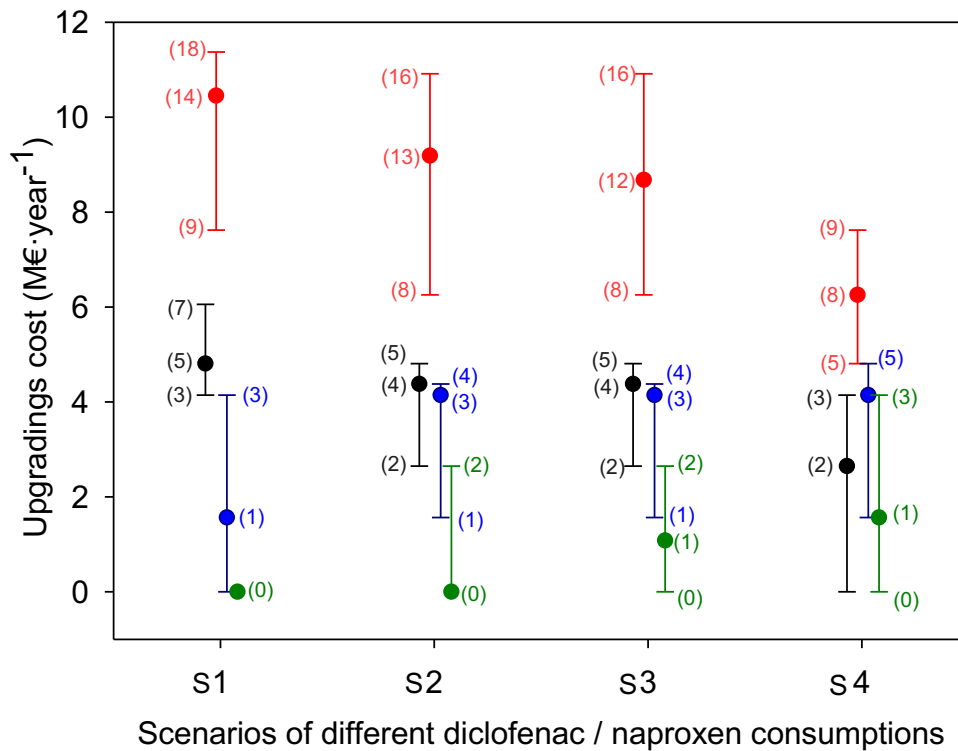
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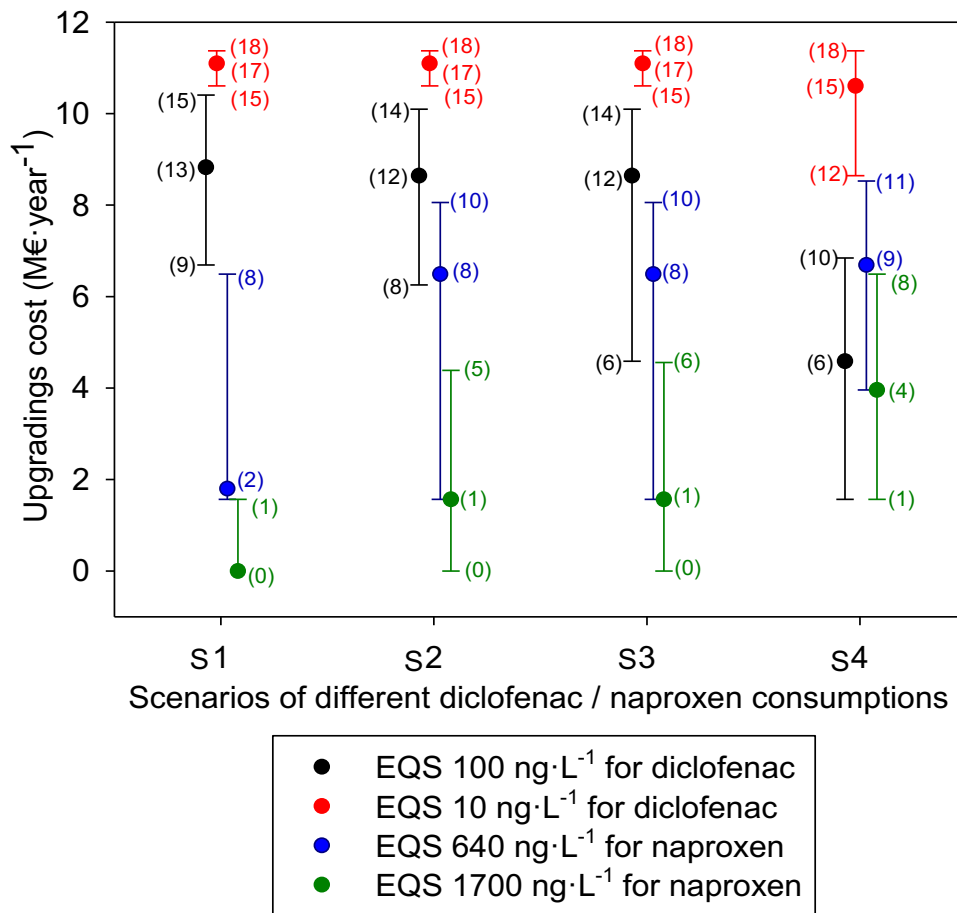
441 Figure 3. Model predicted versus measured loads of naproxen in the river sampling points (black
 442 symbols) and in the influents and effluents of the Igualada and Manresa WWTPs (colored
 443 symbols). Each prediction consists of 3 simulated values (circle = median loads, bars = worst and
 444 best probably loads). Points located on the bisector indicate a perfect fit between predicted and
 445 measured values. Predictions lie within the dashed lines parallel to the bisector if they do not
 446 deviate by more than ± 50 from the corresponding measured value.

447



448

449 Figure 4. Number of WWTP upgrades (shown in brackets) and upgrading costs optimized to
 450 avoid EQS exceedance of 10 and 100 ng·L⁻¹ for diclofenac and 640 and 1,700 ng·L⁻¹ for naproxen
 451 for the average flows. These are calculated for the scenarios S1, S2, S3 and S4 in the consumption
 452 of diclofenac and naproxen defined in table 3. The number of WWTP upgrades and the costs are
 453 optimized for the median, worst and best concentrations of diclofenac and naproxen.



454

455i Figure 5. Number of WWTP upgrades (shown in brackets) and upgrading costs optimized to
 456 avoid EQS exceedance of 10 and 100 ng·L⁻¹ for diclofenac and 640 and 1,700 ng·L⁻¹ for naproxen
 457 for the environmental flows. These are calculated for the scenarios S1, S2, S3 and S4 in the
 458 consumption of diclofenac and naproxen defined in table 3. The number of WWTP upgrades and
 459 the costs are optimized for the median, worst and best concentrations of diclofenac and
 460 naproxen.

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	Diclofenac (percentile)			Naproxen (percentile)		
	2.5th	50 th	97.5th	2.5th	50 th	97.5th
F	0.11	0.15	0.23	0.13	0.18	0.25
k_{WWTP}	0.12	0.25	0.70	0.72	1.25	2.61
WWTP Removal (%)	23	38	63	65	76	87
k_{river}	$1.4 \cdot 10^{-7}$	$3.0 \cdot 10^{-6}$	$1.5 \cdot 10^{-5}$	$2.2 \cdot 10^{-6}$	$9.4 \cdot 10^{-6}$	$2.4 \cdot 10^{-5}$

467 Table 1. Calibrated model parameters for naproxen and diclofenac (latter one from Gimeno et
468 al., 2017).

469

470 Table 2. Scenarios for the consumptions of diclofenac and naproxen.

471

Scenario	Description	Diclofenac			Naproxen		
		Prescribed	OTC	Total	Prescribed	OTC	Total
S1	Consumption in 2010 Reference scenario	6.9	6.6	13.5	5.5	1.5	7
S2	Consumption in 2016 Substitution in S1 prescriptions Increase S1 OTC	3.2	8	11.2	9.9	3.9	13.8
S3	Substitution in S2 prescriptions S2 OTC remains the same.	1.9	8	9.9	11.2	3.9	15.1
S4	Substitution in S2 OTC and prescriptions (same as S3)	1.9	1.7	3.6	11.2	10.2	21.4
Units:DDD·1000inhab ⁻¹ day ⁻¹ ;							

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