

FEEDBACK ON THE PROPOSAL SUBMITTED BY THE ITALIAN GOVERNMENT FOR A NATIONAL DECREE ON END-OF-WASTE STATUS OF CONSTRUCTION AND DEMOLITION WASTE

The Italian ministry of Economic Development notified to the European Commission a draft regulation on end-of-waste criteria for construction and demolition waste (C&DW). FIR welcomes the initiative to regulate the end-of-waste status for this material, as it can be a relevant instrument to support recycling. We have however doubts that the currently developed decree will indeed do so.

FIR represents the recycling industry of C&DW and of Incinerator Bottom Ash (IBA). Our members have strongly been involved in the development of national end-of-waste regulations for recycled aggregates. Based on our experience, we consider that only a small percentage of recycled C&DW (recycled aggregates) in Italy will meet the requirements of the proposed decree. This judgement is based on a vast amount of data for instance from The Netherlands and Flanders.

FIR has compared limit values (criteria) of the proposed decree with test results of a large amount of samples taken from individual batches of recycled aggregates. It was concluded that most of the recycled aggregates produced would not meet the limit values of the proposed Italian decree.

This finding is in line with a recent survey of FIR's member ANPAR, the Italian association for producers of recycled aggregates. From 20 authorised recycling facilities, 36 samples were analysed. In 80% of the samples taken at least one parameter exceeds a limit value of the proposed decree. This information has been shared by ANPAR during earlier stakeholder consultations.

FIR believes that when the now notified draft decree would be accepted, recycling of C&DW will seriously be hampered in Italy. Most of the production will not meet the requirements of the proposed decree. As a result, many existing recycling plants will have to close. Another main consequence will be that C&DW must find other ways. FIR believes that this will mean landfilling of C&DW or even worse.

Acceptance of the notified decree will also mean an important setback of the attempts to create a circular economy in Italy and in Europe. It will become impossible for Italy to reach targets set in European legislation for C&DW.

It is the wish of FIR that full and high quality recycling of C&DW will be achieved in Italy, as well as in all other parts of the EU. Therefore it is important to have a well-functioning end-of-waste regulation. FIR offers its assistance to design such a regulation. For that, it can rely on a vast amount of expertise and experience of C&DW recycling in Europe and specifically on experience with existing end-of-waste regulations in some member states.

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