



Prot . n. 746 of 25/11/2025

To ENV.B03 “CIRCULAR ECONOMY &
SECONDARY RAW MATERIALS”

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To Dr. Mafalda Machado

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Object: Report on the Regional Waste Management Plan of the Sicilian Region.

To the attention of Director ENV. B “Competitive Circular Economy & Clean Industrial Policy”,

To the attention of Dr. Mafalda Machado,

We received from Dr. Machado of Deloitte via email, on the last 6th November 2025, and subsequently on 14th November, in its latest version, the “*Assessment Report on the Waste Management Plan of Sicily, in relation to the enabling conditions of the Common Provisions Regulation*”.

In response to the questions raised under point C. *Open questions to the Competent Authority*, we hereby submit the following:

Question 1 – Criteria number 1a)

[EN] *Information regarding:*

- *Quantities for packaging waste, batteries/accumulators, waste oil – vegetable, waste oil – mineral, textiles, waste containing significant amounts of critical raw materials, tyres, contaminated soil;*
- *Source for: plastic waste, paper & cardboard, glass, packaging waste, wood, batteries/accumulators, WEEE, waste oils – mineral, waste oils -vegetable, textiles, bulky items, waste containing significant amounts of critical raw materials, tyres, contaminated soil;*
- *Mention of waste oil – vegetable.*

Could you please clarify if such information is included in the WMP?

Note: Regarding waste oil – mineral, please clarify what kind of oils mentioned in the WMP are considered in this waste type (e.g. spent oils and residues of liquid fuels).

On page 20 of the Special Waste Management Plan, specific quantities for packaging waste and waste mineral oils have been reported, with data obtained from the National Waste Register maintained by ISPRA. With regard to textile waste, the same document addresses the matter specifically (page 55). For WEEE, data are reported on page 33 of the Special Waste



Management Plan. In this case, it should be noted that 32% of the total regional collection is carried out at distribution collection points.

With respect to the other material fractions requested, the Plan does not report specific quantities for batteries/accumulators, waste vegetable oils, waste containing significant amounts of critical raw materials, tyres and contaminated soil, as the requested information is not available in the published National Waste Register but can be obtained by directly querying the MUD database for individual EWC codes.

In relation to the request, recognizing the growing interest deriving from knowledge of the information associated with the indicated material fractions, it was deemed appropriate to conduct a more detailed analysis. Consequently, ARPA SICILIA (i.e. the environment authority of Sicily) was requested to query the database, acquiring data relating to the EWC codes processed by facilities treating the specific material fractions requested.

Question	EER code assigned
Quantities for packaging waste ,	Packaging made of: 150101 paper and cardboard; 150102 plastic; 150103 wood; 150104 metal; 150105 composites; 150106 multi-materials; 150107 glass; 150109 textiles; hazardous 150110*
batteries / accumulators ,	160601 lead; 160602 nickel; 160604 alkaline; 160605 lithium
waste oil – vegetable ,	190809 Mixtures of oils and fats; 200125 Edible oils and fats
waste oil – mineral ,	hazardous, grouped as mineral and synthetic oils 130301*; 130306*; 130307*; 130308*; 130309*; 130310*; 130403*
textiles ,	040221 raw textile fibers; 040222 processed textile fibers; 200110 clothing
waste containing significant amounts of critical raw materials ,	hazardous: 010307* chemical and physical treatments of metal ores; 100207* treatment of fumes containing hazardous substances; 160213* discarded equipment containing hazardous components; 160605* other batteries and accumulators
tires ,	160103 worn-out tires
contaminated soil ;	dangerous: 170503* soil and rocks, containing dangerous substances

Packaging : information retrieved from the sheet dedicated to the aforementioned typology, relating to waste coming from production facilities and private surfaces:

EER Code	H/NH	WASTE TYPE	QUANTITIES IN TONNES
150101	NH	paper and cardboard packaging	70,996
150102	NH	plastic packaging	40,213
150103	NH	wooden packaging	7.148
150104	NH	metal packaging	1,727
150105	NH	composite packaging	234
150106	NH	mixed material packaging	25,340
150107	NH	glass packaging	7,979
150109	NH	textile packaging	1
150110*	H	packaging containing residues of dangerous substances or contaminated by such substances	52
150111*	H	metal packaging containing hazardous porous solid matrices (e.g. asbestos), including empty pressure containers	1
		Subtotal NH	153,638
		Subtotal H	53
		Total waste received	153,691

**Batteries and Accumulators (information retrieved from the Special Waste sheets)**

EER Code	H/NH	WASTE TYPE	T . Made in UL	T . Produced outside UL	T. Received from third parties	Totals
160601*	H	Lead-acid batteries	5,748	322	104.083	110.153
160602*	H	Nickel batteries	9	1	15	25
160604	NH	Alkaline batteries	5	1	21	27
160605	NH	Other batteries and accumulators	9	1	18	28
		Subtotal H	5,757	323	104,098	110,178
		Subtotal NH	14	2	39	55
		Total waste received	5,771	325	104.137	110,233

Batteries and Accumulators (information retrieved from VFU cards)

EER Code	H/NH	WASTE TYPE			T. Received from third parties	Totals
160601*	H	Lead-acid batteries			4,751	4,751

Vegetable oils:

EER Code	H/NH	WASTE TYPE	T . Made in UL	T . Produced outside UL	T. Received from third parties	Totals
190809	NH	mixtures of oils and fats	264	5	3.127	3,396
200125	NH	edible oils and fats	620	6	33	659
		Subtotal NH	864	11	3.160	4.035
		Total waste received	864	11	3.160	4.035

Mineral and synthetic oils, a single data item that includes the hazardous EERs 130301*; 130306*; 130307*; 130308*; 130309*; 130310*; 130403*

EER Code	H/NH	WASTE TYPE	T . Made in UL	T . Produced outside UL	T. Received from third parties	Totals
130301*; 130306*; 130307*; 130308*; 130309*; 130310*; 130403*	H	Mineral and synthetic oils	32,065	26,326	45,830	104,221

Textiles (information retrieved from the Special Waste sheets)

EER Code	H/NH	WASTE TYPE	T . Made in UL	T . Produced outside UL	T. Received from third parties	Totals
040221	NH	raw textile fibers	41		40	81
040222	NH	processed textile fibers				
200110	NH	clothing	242	333	111,765	112,340
		Subtotal NH	864	11	111,805	112,680
		Total waste received	864	11	111,805	112,680

Waste with critical materials (information retrieved from the Special Waste sheets)

EER Code	H/NH	WASTE TYPE	T . Made in UL	T . Produced	T. Received	Totals
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				outside UL	from third parties	
100207*	H	treatment of fumes containing hazardous substances	5,423	-	-	5,423
160213*	H	Discarded equipment containing hazardous components	1.197	1,721	4.017	6.935
160605*	H	Other batteries and accumulators	(already accounted for)			
		Sub tot H	6,620	1721	4.017	12,358
		Total waste received	6,620	1721	4.017	12,358

PFU (information retrieved from the Special Waste sheets)

EER Code	H/NH	WASTE TYPE	T . Made in UL	T . Produced outside UL	T. Received from third parties	Totals
160103	NH	Tires	470	36	102.004	102,510

PFU (information retrieved from VFU cards)

EER Code	H/NH	WASTE TYPE			T. Received from third parties	Totals
160103	NH	Tires			10,902	10,902

Contaminated land (information retrieved from the Special Waste data sheets)

EER Code	H/NH	WASTE TYPE	T . Made in UL	T . Produced outside UL	T. Received from third parties	Totals
170503*	H	soil and rocks, containing hazardous substances	15,117	3.045	129,351	147,513

The overall quantity of hazardous (H) and non-hazardous (NH) special waste considered amounts to 762,894 tonnes.

The information obtained has made it possible to ascertain the existence of a discrepancy between the data published in the National Waste Register maintained by ISPRA (National authority) and what can be inferred through direct querying of the MUD database. This difference derives from the fact that the data published in the National Waste Register refer exclusively to production as can be inferred through the MUD declarations of initial producers. In fact, not all waste producers are required to submit such declarations. Conversely, the data extracted by ARPA SICILIA reported above concern treatment facilities for the specific material fractions indicated therein, which are legally obliged to submit such declarations as environmental operators. Consequently, the extracted data are more closely aligned with the reality of the regional territory as they are not affected by the inevitable underestimation deriving from the declarative deficit of producers. On the other hand, the information extracted in this manner may be affected by inaccuracies deriving from presumed albeit limited duplication of data caused by the transfer of materials from one facility to another without any variation of the EWC code.

Question 2 – Criteria 1a)

Could you please clarify what kind of organic waste source “Sottovaglio (frazione organica)” refers to? (page 112 of the urban waste WMP)

On page 112 of the Municipal Waste Management Plan, the designation “Sottovaglio (frazione organica)” [undersize/screening fraction (organic fraction)] refers to the organic fraction deriving from the treatment of unsorted waste at the sorting/recovery/refining platforms described in Chapter 7.2.3 of the Plan (page 101): “Organic fraction refining: Mechanical treatment also produces a wet fraction (called undersize) exiting from the primary screen.



The undersize will be subjected to volume reduction and drying (volume reduction of approximately 50% and weight reduction of approximately 30% due to evaporation of the moisture content), with activation of the thermophilic phase which facilitates either the production of biomethane (should it be sent to biodigestion), or the production of Stabilised Organic Fraction (SOF) should it be sent to stabilisation beds (with reduced stabilisation times compared to current ones)". The platforms will enable the valorisation of the organic fraction, unlike what was observed in 2022. From mechanical-biological treatment facilities, during 2022, 232,003 tonnes of organic fraction were generated, which was landfilled.

Question 3 – Criteria 3a)

Information on the need for the closure of existing waste installations. Could you please clarify if such information is included in the WMP?

The types of existing waste treatment facilities surveyed in the Municipal Waste Management Plan are essentially three: landfills, MBT facilities and facilities for organic fraction treatment.

Landfills for which no expansion is envisaged, or which are not deemed functional to the objectives of the Plan, are destined for closure as soon as they exhaust their disposal capacity.

Conversely, publicly-owned MBT facilities must be upgraded to be used as intermediate facilities aimed at sorting/refining/recovering materials and producing RDF-C from the residual fraction that is no longer recoverable.

The working hypothesis is to establish one sorting/refining/recovery platform per province, including through the conversion of the 5 MBT facilities surveyed by the RWMP. Consequently, the existing MBT facilities will be progressively replaced by sorting and recovery platforms.

The Special Commissioner will proceed by means of their own Orders to make provisions regarding the platforms under the responsibility of each optimal territorial area (OTA), namely the platforms to which each individual OTA must deliver unsorted waste and quotas of organic fraction and rejects.

Furthermore, the Special Commissioner will proceed with the adoption and/or revision of financing programmes already adopted or in progress (PR-ERDF Sicily 21/27, DFC 21/27, POC, NRRP etc.) in order to concentrate financial resources for the achievement of Community objectives (65% recovery and max 10% to landfill) with the priority implementation overall of:

- No. 9 platforms for sorting/recovery/refining of municipal waste for approximately 1,264,000 tonnes/year (consequently the forecast of 16 public platforms reported in the RWMP is scaled down);
- No. 7 expansions of 7 public landfills (already programmed) for 233,000 tonnes/year starting from 2029 (8% of municipal waste);
- No. 5 (at least) downstream recovery facilities for separate collection for the recovery of at least 180,000 tonnes/year.

For organic fraction treatment facilities, the effective utilisation capacity in the Sicilian Region of OFMSW, undersize and sewage sludge, following treatment with volume and weight reduction, equals approximately 427,000 tonnes/year. The Plan notes that (Chapter 2, paragraph 3.1.) "the numerous applications under assessment at the DRAR largely exceed the quantity of organic waste available". Considering that a biomethane production facility – to be economically sustainable – requires a feedstock of no less than 40,000 tonnes, it is realistic to envisage a maximum number of facilities between 8-10, namely less than half of those under assessment.



Question 4 – Criteria 3b)

Information on installations needing closure or additional infrastructure interventions and motivation for: ▪ Installations covering special arrangements for waste oils (used engine oils, hydraulic oil, lubricating oil, ...) ▪ Installations covering special arrangements for hazardous waste (chemicals, batteries, electronic waste, medical waste, ...), ▪ Installations covering special arrangements for waste containing significant amounts of critical raw materials. Could you please clarify if such information is included in the WMP?

The Waste Plan does not include specific provisions relating to treatment facilities for waste oils.

On page 39 of the Special Waste Plan, there are specific actions to bridge the facility gap relating to the collection and treatment of WEEE also aimed at recycling raw materials deemed strategic.

At the same time at pages 61 and 62 of the Special Waste Plan, there is specific treatment relating respectively to healthcare waste and asbestos-containing waste.

Trusting that we have provided the clarifications sought and remaining available for any further issues that may need to be addressed, we take this opportunity to convey best regards.

The Head of the regional special office
Eng. Salvatore Cocina