



Council of the  
European Union

Brussels, 12 June 2023  
(OR. en)

10478/23  
ADD 8

ENV 672  
COMPET 608  
MI 508  
AGRI 314  
IND 308  
CONSOM 225  
ENT 131

#### COVER NOTE

---

From: Secretary-General of the European Commission, signed by Ms Martine DEPREZ, Director

date of receipt: 8 June 2023

To: Ms Thérèse BLANCHET, Secretary-General of the Council of the European Union

---

No. Cion doc.: SWD(2023) 185 final

---

Subject: COMMISSION STAFF WORKING DOCUMENT  
The early warning report for Croatia  
*Accompanying the document*  
REPORT FROM THE COMMISSION TO THE EUROPEAN PARLIAMENT, THE COUNCIL, THE EUROPEAN ECONOMIC AND SOCIAL COMMITTEE AND THE COMMITTEE OF THE REGIONS identifying Member States at risk of not meeting the 2025 preparing for re-use and recycling target for municipal waste, the 2025 recycling target for packaging waste and the 2035 municipal waste landfilling reduction target

---

Delegations will find attached document SWD(2023) 185 final.

---

Encl.: SWD(2023) 185 final



Brussels, 8.6.2023  
SWD(2023) 185 final

## COMMISSION STAFF WORKING DOCUMENT

### The early warning report for Croatia

#### *Accompanying the document*

**Report From The Commission To The European Parliament, The Council, The European Economic And Social Committee And The Committee Of The Regions**

**identifying Member States at risk of not meeting the 2025 preparing for re-use and recycling target for municipal waste, the 2025 recycling target for packaging waste and the 2035 municipal waste landfilling reduction target**

{COM(2023) 304 final} - {SWD(2023) 175 final} - {SWD(2023) 176 final} -  
{SWD(2023) 180 final} - {SWD(2023) 181 final} - {SWD(2023) 182 final} -  
{SWD(2023) 183 final} - {SWD(2023) 184 final} - {SWD(2023) 186 final} -  
{SWD(2023) 187 final} - {SWD(2023) 188 final} - {SWD(2023) 189 final} -  
{SWD(2023) 195 final} - {SWD(2023) 196 final} - {SWD(2023) 197 final} -  
{SWD(2023) 198 final} - {SWD(2023) 199 final} - {SWD(2023) 200 final}

## 1. Introduction

The early warning report aims to assist Member States at risk of failing to meet: (i) the 2025 target of 55% for the preparing for re-use and the recycling of their municipal waste (this target is set out in Article 11(2)(c) of Directive 2008/98/EC); and (ii) the 2025 target of 65% for the recycling of their packaging waste (this target is set out in Article 6(1)(f) of Directive 1994/62/EC). It also provides an update on how Member States are performing against the 2035 target to send no more than 10% of their municipal waste to landfill (this target is set out in Article 5(5) Directive 1999/31/EC).

This report builds on previous support provided by the Commission to help Member States comply with EU law on municipal waste management, including, where relevant, the early warning report from 2018<sup>1</sup>.

The assessment underpinning the early warning report identified 18 Member States at risk of missing the 2025 preparing for re-use and recycling target for municipal waste, 10 of which are also at risk of missing the 2025 recycling target for all packaging waste.

This assessment is based on a collaborative and transparent process involving the Member States concerned, the European Environment Agency<sup>2</sup>, and an in-depth analysis of the most recent policy developments in the Member States. This process also involved extensive consultation with the Member State authorities in charge of waste management. The possible actions identified during this process are based on existing best practices and aim to help Member States meet the 2025 targets, and as such they focus on policy measures which can be taken in the short term. These actions should be seen as complementary to those recommended in the roadmaps which were drawn up as part of preceding compliance-promotion activities and to those recommended in the Environmental Implementation Review<sup>3</sup>.

## 2. Key findings

Based on the analysis of collected data and existing policies in the area of waste management, Croatia is considered to be at risk of missing the 2025 target of 55% for the preparing for re-use and the recycling of its municipal waste and the 2025 target to recycle 65% of packaging waste. Despite the significant decrease of the landfilling rate, the distance to the 2035 target to landfill 10% of municipal waste is also of concern.

Croatia's recycling rate of municipal waste significantly increased from 21% in 2016 to 34.4% in 2020 (applying new calculation rules would lower the 2020 rate to 30%). Despite a significant decrease in the landfilling rate (from 76.7% in 2016 to 55.7% in 2020), Croatia continues to rely heavily on landfilling.

The total recycling rate for packaging waste decreased from 60.1% in 2015 to 48.9% in 2019. This decrease seems related to certain issues in the quality of the data collection that have only been partially addressed. In 2020 the recycling rate for all packaging waste increased to 54.2%. The recycling targets to be reached by 2025 for specific packaging materials have only been reached for paper and cardboard packaging. However, recycling rates are more than 15% below the specific targets for all other packaging (i.e. plastic, wood, metals and glass).

---

<sup>1</sup> An early warning report was issued for Croatia in 2018 (SWD(2018) 421 final). A total of 16 recommendations were provided. According to the Croatian authorities, 10 of the recommendations are considered as being implemented, four partially implemented and two not implemented.

<sup>2</sup> EEA and ETC/CE (2022). Early Warning Assessment Related to the 2025 Targets for Municipal and Packaging Waste (<https://www.eea.europa.eu/publications/country-profiles-early-warning-assessments>)

<sup>3</sup> European Commission (2022). Environmental Implementation Review 2022. COM/2022/438 final. ([https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=comnat%3ACOM\\_2022\\_0438\\_FIN](https://eur-lex.europa.eu/legal-content/EN/ALL/?uri=comnat%3ACOM_2022_0438_FIN))

Some of the main challenges facing waste management in the country include:

- a possible underestimation of the amount of packaging waste generated (it was less than half the EU average in 2019: 74 kg/person vs 177 kg/person); this is likely due to underreporting of packaging placed on the market, leading to underestimating the effective recycling rate and affecting extended producer responsibilities;
- weak enforcement mechanisms and a lack of coordination between various administrative levels in the implementation of waste management according to the principles of waste hierarchy;
- significant reliance on landfilling, including of biowaste: Croatia reported that 79% of biodegradable waste was landfilled in 2020.

Croatia has recently seen a significant increase in the recycling rate of municipal waste and has put in place many measures and made major investments. This is all expected to help the country make additional progress in the coming years. However, efforts should be stepped up significantly in order to reach all 2025 targets, and the distance to the 2035 target on landfill needs further attention.

### 3. Key recommendations

Among the measures deemed necessary to support Croatia's efforts to improve its performance in waste management, three main recommendations are listed below.

1. Support preparing for re-use of municipal waste and re-use systems for packaging
2. Impose restrictions on the landfilling of all waste that is suitable for recycling and introduce taxes on landfilling. This will incentivise municipalities to be more effective in sorting, collecting, and recycling waste.
3. Address the data quality issues concerning packaging waste generated.
4. Further develop waste treatment infrastructure associated with the higher steps of the waste hierarchy (such as increasing capacity for treating biowaste and supporting home composting).

The table below lists a number of possible actions to support Croatia's efforts to improve its performance in waste management.

### 4. Good practices

The following measures implemented by Croatia are considered good practices contributing to the improvement of its recycling performance.

- Biowaste treatment capacity boosted through EU funding –EU funds were allocated to Croatia through the 2014-2022 operational programme for competitiveness and cohesion for nine composting plants. In addition, under the 2021-2026 national recovery and resilience plan, a new open call was published in May 2022 for building new composting plants.
- Facilitate sound waste management – An online platform, 'Burza otpada'<sup>4</sup>, enables companies list the available waste that they want to dispose of. It acts as a centre for the supply and demand of all types of waste. The waste listed on this platform must meet technological criteria required for certain categories of waste.

---

<sup>4</sup> <https://digitalnakomora.hr/e-gospodarske-informacije/burza-otpada/centar-informacija/o-burzi-otpada>.

## OVERVIEW OF POSSIBLE ACTIONS TO IMPROVE PERFORMANCE

### Governance

- 1) Address data quality issues on generated packaging waste as a priority. Creating a register of producers with extended responsibility and imposing penalties are expected to help improve the data quality (although not before 2024). However, additional action is needed to achieve coherence between municipal waste and packaging waste data sets.
- 2) Set mandatory objectives or indicators on separate waste collection to be achieved by the bodies in charge of the collection of municipal waste (e.g. municipalities) in order to monitor, enforce and achieve higher capture rates. This could be complemented with a system of financial rewards and penalties for those entities depending on whether they achieve the targets or not. Information on the performance of municipalities could also be made available to the general public to raise awareness (e.g. on a website).

### Prevention

- 3) Take measures to increase re-use and to prevent the generation of non-recyclable municipal waste.
- 4) Swiftly adopt the waste prevention programme, which is part of the 2023-2028 national waste management plan. The country should foster coordination between the central and the local government to achieve EU waste prevention objectives. Croatia should also properly monitor implementation of waste prevention measures and ensure sufficient budget is allocated to them.

### Separate collection

- 5) Roll out high-convenience collection services to a larger part of the population, especially for biowaste. Additional improvements are necessary to achieve and maintain a high quality of separately collected biowaste.

### Waste treatment

- 6) Develop waste treatment infrastructure associated with the higher steps of the waste hierarchy. Firm plans and concrete action are needed, such as supporting home composting and increasing capacity for treating biowaste to fully cover all generated biowaste. Extending treatment plants has already started or is planned, although the total capacity which would be reached is still not considered to be sufficient.
- 7) Support preparing for reuse of municipal waste and develop waste-treatment infrastructure in a way that focuses on the higher steps of the waste hierarchy. Firm plans and concrete actions are needed, such as supplementing centralised biowaste treatment with decentralised composting solutions such as home composting and community composting.

### Communication and awareness-raising

- 8) Carry out awareness-raising activities specifically tailored to different target groups (e.g. households, commercial waste generators, schoolteachers, students and tourists) to increase participation in separate collection. A set of national communication materials addressed to the public for use at local level, with clear and consistent messages can be developed. These materials should be used as part of awareness-raising activities on social media and the internet and at civic amenity sites. Communication materials (e.g. leaflets) could be made available in English to help

tourists contribute to separate collection of waste.

**Extended producer responsibility and economic instruments**

9) Implement economic instruments (e.g. raising landfill taxes to a sufficient magnitude) to incentivise waste management associated with the higher steps of the waste hierarchy. This will make re-use, preparation for re-use and recycling economically attractive and reduce dependency on landfilling. The economic incentive should be designed and sufficiently large to develop a 'steering effect'. The most effective landfill taxes are considered to be those that increase over time in correlation with specific targets.

10) Stepping up efforts to establish re-use systems for packaging will bring environmental benefits and help Member States in complying with the EU packaging recycling targets.