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# 5.1.2 List of the main gaps deriving from missed linkages between various policies within IT and HR regulatory frameworks

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#### **PROJECT MARLESS**

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#### If needed:

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## 1. Waste management in the Republic of Croatia; introduction and baseline situation

It was established in the National Environmental Protection Strategy and the National Environmental Action Plan (Official Gazette No. 46/02) that an irresponsible waste management is the biggest problem burdening the field of environmental protection in Croatia. The quantity of waste is ever increasing and the infrastructure put in place for the management of such waste is far from sufficient. The waste management system is not fully functional which is inter alia due to insufficient respect of legislation regulating the field of waste management. Unless significant changes are introduced, the waste management crisis is likely to assume great proportions. The lack of order in the current waste management system has had a variety of negative effects on environmental components such as the water, air, sea and soil, as well as on the climate, human health and the wellbeing of other living beings. The groundwater resources, recognized as the main source of drinking-water reserves and a basic national resource, are particularly threatened. The greatest harm may be inflicted by waste (including harmful waste) that is accumulated at the premises of waste generating companies, mostly because of possible risks to environment and human health. An efficient and rapid solution to present waste management problems is required not only to preserve the quality of life of our citizens, Croatia's attractiveness as a favored tourist destination, and the international image of our country based on well preserved environment and health food production, but also to facilitate and ensure success of negotiations with the European Union (EU). The following is inter alia stated in the Avis the European Commission formulated on April 20, 2004 about Croatia's application for membership in the European Union (EU): The waste management is the biggest individual problem regarding environmental protection in Croatia. In addition to the need to adjust the regulatory framework with the EU requirements and standards, the country must change the current situation in which the regulations in force are not respected. This sector is the main challenge for Croatia and will require greatest efforts during harmonization with the EU acquis.

#### 1.1 Legal framework

Legal foundations for waste management operations have been put in place over the past decades. They are formed of the Law on Waste, Law on Environmental Protection, Law on Air, Law on Environmental Protection and Energy Efficiency Fund, Law on Physical Planning, Law on Utility Services, Maritime Law, Law on Maritime Domain and Ports, Law on Ratification of Basel Convention, Kyoto Protocol on Climate Change, Montreal Protocol, Stockholm Convention, International Convention MAR POL 73/78, i.e. the Protocol V regulating waste disposal in ports,



Barcelona convention, and implementing regulations of these laws. In addition, some waste management aspects are regulated by other sectoral regulations. The legal framework in the field of waste management has not been successfully enforced, and so the supervision of waste management activities can be described as inadequate. The current situation is mainly due to the non-enforcement of regulations and lack of financing.

A significant step toward the harmonization with the acquis communautaire in the field of waste management has been made by enactment of the Law on Waste Management (Official Gazette No. 84/21).

#### 1.2 Waste management - vision and priorities

The waste management has been defined in the Environmental Protection Strategy of the Republic of Croatia as an area of national priority. The vision or perception of waste management adopted by the Republic of Croatia is the so called zero waste concept aspiring toward an ideal situation. To achieve this vision it would be necessary to close the circle consisting of the waste prevention, reductions in the quantity and harmfulness of waste, recycling and recovery (mechanical, biological, power-based), and use of inert residues. To reach this objective, constant efforts must be made to educate and sensitize all target groups and to enable participation of citizens in the entire process: from the first concept to the realization and operation.

To enable implementation of the Strategy, the following objectives have been set:

- harmonize national legislation with the EU legislation and take measures to ensure its enforcement/implementation;
- provide for proper education in the sphere of environment and waste management;
- avoid generation of waste reduce quantities and harmful properties of waste;
- make greater use of fees charged for environmental impacts of waste generation;
- allocate greater funding for waste management;
- encourage separate collection of waste;
- improve the existing landfill sites;
- increase the quality and volume of data about the quantity of waste and waste streams;
- build waste treatment facilities and installations;



• increase the proportion of controlled collection and disposal of waste.

#### 2. CURRENT SITUATION

#### 2.1 Evaluation of situation - problems and obstacles

The problems with waste management are quite pronounced in Croatia, and delays in finding solution for all types of waste, as witnessed in the past period, have resulted in the current situation which is highly critical in most local government units. That is why an absolute priority is given to finding appropriate solutions to all waste management problems, particularly those relating to municipal waste and hazardous waste. Inappropriate waste management practices are harmful to all components of our environment. They are detrimental to human health, while also negatively affecting natural landscape and, in general, all activities conducted in a region affected by such practices. The quantity of waste is increasing ant the infrastructure currently available for the management of such waste is insufficient. The waste management system is not completely functional, which is inter alia due to partial and/or inadequate enforcement of prevailing regulations (non-respect and poor enforcement have been if fact identified as a significant problem).

The following difficulties have also been noted:

- insufficient awareness of legal persons that they are accountable for the waste they generate;
- inadequate education of general public and employees of companies in charge of waste management;
- insufficient knowledge of waste management practices and trends currently applied in the EU;
- the data gathering system has been set up, but the implementation is not satisfactory,
- excessive number of unorganized, uncontrolled and environmentally dangerous landfill sites;
- incomplete territorial definition of landfill locations, waste management centres, and other facilities and installation forming part of the waste management system;
- inexistence of design documents and required permits, and unsolved property-rights relations for some of the existing and planned facilities and installations;
- poor application of market-based principles and insufficient use of the "polluter pays" concept;



• difficulties encountered while putting in place regional associations and organizations, aimed at establishing a modern management system for municipal waste and other nonhazardous waste.

The awareness of general public about the need to avoid generation of waste, considered a priority in every modern waste management hierarchy, and to separately collect different sorts of waste, is less than adequate. The incentives for the use of recycled products are insufficient and, in this respect, it would urgently be required to establish an appropriate system for separate collection of waste and for making use of specific types of waste already identified as being of commercial and environmental interest. In addition to paper and glass, for which treatment plants have already been put in place, it would also be highly justified to improve current practices regarding collection of waste oil, used tyres, etc. as these materials can be used as a source of energy in cement plants and other installations, or can be treated and reused.

The problem is especially acute in the sphere of hazardous waste management as disposal measures have not been put in place and, as a result, manufacturers and treatment plant operators often resort to storing such waste at their premises. Other options that have increasingly been used are export and uncontrolled dumping, which is harmful to environment and human health. No disposal site has so far been put in place for hazardous waste. There is however a possibility of completing installation of facilities for thermal treatment of hazardous waste, but only if all legal preconditions for such treatment are met. A portion of production capacities where thermal treatment of waste is possible is not sufficiently used, and the only facility for the thermal treatment of hazardous waste (PUTO - Zagreb) has been closed since the summer of 2002.

No attention has so far been paid in Croatia to the disposal of hazardous waste at the localities of high risk as defined by the competent national authority, which is why urgent activities must be conducted to improve situation at these localities (hazardous waste disposal is an activity of national concern and responsibility). Poor reliability of information relating to this field greatly hinders activities aimed at monitoring generation and disposal of hazardous waste. Most capacities that are available for the treatment of hazardous waste, i.e. almost 80 percent, are used for the incineration of waste oil only. Due to reduction of activity in the manufacturing sector, it can reasonably be assumed that the generation of hazardous waste in our country is stagnating. At the same time, the quantity of hazardous waste that is exported from the country is at the rise, which is why it would be highly advisable to solve the problem through thermal treatment of such waste in Croatia. Hazardous medical waste is not disposed of in an appropriate manner. Only some types of this waste are treated and, in addition, the problems relating to temporary storage of such waste have not as yet been solved. All types of waste, including the hazardous waste, are currently stored on almost all landfill sites in Croatia. A special problem encountered during construction and improvement of landfill sites arises from a specific hydrogeological feature, known as the karst phenomenon, which is present on more than one half of the national territory. Special protection measures must be put



in place in such areas to protect underground zones and ground water. In this respect, complex multiple layer systems, mainly composed of liners and drainage layers, are placed to protect the environment. The waste present in the sea, in ports, marinas, on fish farms, and the waste discharged from ships and fishing boats, is a very serious problem that endangers all forms of life in the sea and on sea bottom, unless waste water is treated in an appropriate way.

The waste discharged from ships is estimated at 13,000 m<sup>3</sup>/year of solid waste and 24,000 m<sup>3</sup>/year of oil-infested water and mud. All this despite the fact that such waste should be collected in an organized way and disposed of on land, in compliance with the International Convention MAR POL 73/78, or Protocol No. V regulating disposal of waste in ports.

An another significant problem Croatia is faced with in this area are the uncontrolled dumpsites. According to available information, the number of such dumpsites is currently estimated at more than 3000. The funding allocated to waste management is lagging behind real needs in this area. Thus the price of collection and disposal of waste does not reflect the price that would normally be charged for similar services so that the price currently charged can not cover the total cost of waste management activities. Although the Environmental Protection and Energy Efficiency Fund has directed much of its 2004 income from special contributions towards improvement and remediation of existing landfill sites, the funding is still insufficient and can not cover the existing needs. It should be noted that - other than this extrabudgetary Fund - the state budget does not have enough funding for waste management. The attitude of public towards waste is mostly negative and highly hostile to the construction of waste management facilities and installations, from recycling yards to disposal sites and thermal treatment plants. The system has not been put in place to properly inform and educate general public, government administration officials, political bodies, and even persons conducting waste management activities, about this sensitive issue. The public (all social groups) sees waste and waste management as a problem, but considers that it should be handled by someone else: state, its agencies, county-level bodies, economic operators, etc. Almost all social groups express readiness to act - except on declarative levels - only when they are directly threatened or have found an interest in solving the problem. That is why conflicts are quite common when issues relating to waste management and sustainable development are tackled. This is mainly due to the fact that there are many groups and subjects with different and often conflicting interests (such as state institutions, local government units, economic operators, scientists, experts, associations, political parties, the media, general public or some of its segments, etc.). The conflicts usually arise when new locations are being defined for any kind of waste management facility or plant, and even when it becomes necessary to remedy an existing uncontrolled dumpsite. The main cause of such conflicts is the insufficient knowledge and lack of information about waste issues, mistrust, insufficient participation of public in decisionmaking processes, and the lack of a single and transparent way of defining compensation for reduced value of a real estate property. The problem



is gradually being solved through activities of the Environmental Protection and Energy Efficiency Fund that have been conducted in the scope of the Program for the Remedy of Landfill Sites, as well as through activities of the Environmental Protection Agency (known by its Croatian acronym AZO) which is gradually establishing data bases in the field of waste management (accessible to the public through AZO internet pages) that are also of high significance for monitoring efficiency of the system of waste management at disposal sites (RH - Catastre of Landfill Sites).

#### 3. Policy gap analysis for Croatia

In this Gap Report from Croatian side, among the other, the latest available data and data required by PPWD directive, SUP directive and PBAG Directive were analysed. The goal was to assess the availability of data for reporting, compliance with new reporting formats and calculation rules, to determine gaps, noncompliance issues and to assess needs for new datasets, primarily related to SUP directive.

Waste management permits could provide valuable overview on stakeholders, which participate in management of plastic waste, technological processes and operations applied at the location where plastic waste is managed, etc. Sometimes there is lack of consistency in the permits and understanding weather the R/D operation assigned should be counted as final or non-final. Also is often difficult to understand the total capacity of the waste storage or waste treatment. The database is outdated; therefore, the data processing is time-consuming.

ROO database contains comprehensive annual data on waste generation, collection and treatment, by waste code (LoW) and by R/D treatment operation, but unfortunately not on different plastic materials. If packaging and non-packaging wastes are mixed together, the operator decides the code to be used case-specifically, based on the previous observations on the content of the container and experience. Further, in cases of to multiple phases of waste management, it is complicated to trace waste streams.

For possible future option to collect data on different plastic materials, changes in Waste catalogue could be introduced to distinguish types of polymers. This could be done by expanding Waste Catalogue to contain subnumbers under waste code 15 01 02. Also, in order to recognize certain new waste categories (such as marine litter needed for SUP Directive monitoring), there is a possibility to expand Waste Catalogue with new waste code(s) or to add subnumbers (under 20 01 39 or 20 01 99). This should be implemented in eONTO and ROO applications, as well as other databases relying on Waste Catalogue.

Adjustment of forms to enable easier application of new calculation rules are to be considered, such as provision of data on effectiveness of the recycling process, data on losses and impurities, data on products derived from waste, outputs from sorting plants, etc. This should be ensured by amending the Ordinance on ROO to respond to new requirements. Similar conclusions and recommendations could be applied for other databases or applications described in this report (eONTO, IRDJU...).



#### 3.1 Enhanced waste policy in support of waste prevention and circularity

The new Croatian Waste Management Act is transposing newest EU waste management directives as well as single use plastic Directive. Thus, Croatian waste management legislation introduces measures to prevent or reduce adverse effects of waste on human health and the environment by reducing waste in the generation and/or production, managing waste without using risk procedures on human health and the environment, using valuable properties as part of a circular economy, basic waste management requirements, waste management systems including waste management order, economic instruments and waste management and waste management activities, transboundary movements of waste in line with the relevant EU Directives. Even though waste prevention measures are covering whole life cycle of a product, and have a lot ambitious and relevant measures, waste prevention would need to be updated with newest waste prevention measures from the new EU Circular Economy Plan and newest relevant EU legislation. More determent measures are needed in order to achieve strong impact on waste prevention as top priority in waste management. In order to create a well-functioning market for secondary raw materials Croatia would need to put more effort in introducing requirements for recycled content in products, develop further EU wide end-of-waste criteria for certain waste streams, as well as use of the restrictions on the use of substances of very high concern in articles.

### 3.2 Sustainable product policy initiative: sustainable designing and circularity in production processes

The Eco-design Directive is implemented through productspecific EU Regulations, directly applicable in all EU countries, thus Croatia is aligned with EU Eco-design requirements. The circular economy is not yet sufficiently recognized in abovementioned strategic documents, which might lead to a lack of investment in research, development and innovation related to the circular economy. When updating these strategies CE aspects should get more attention. A Bioeconomy Strategy for Croatia is missing but it is planned to be developed. The bioeconomy topic is covered in other strategic documents such as future Agriculture strategy and in the integrated national energy and climate plan 2021 - 2030. Croatia in its current legislation or policy documents does not target products containing critical raw materials to prevent that those materials become waste.

#### 3.3 Enhancing circularity in a toxic-free environment

Croatia has adequately transposed the EU REACH System and obligations related to it. National Chemical Safety Strategy contains measures to protect human health and the environment from dangerous chemicals. In Croatian policy and legislation there is room for improvement in order to accomplish full circularity in a toxicfree environment and to address all aspects of the new EU



Chemicals Strategy for Sustainability in order to adequately address the interface between chemicals, products and waste legislation and to strengthen synergies with the circular economy. Croatia lacks more determined measures aiming at empowering consumers and public buyers and to enhance the participation of consumers and public buyers in the circular economy initiatives, e.g. local area/neighbourhood initiatives, web based tools to find new users for goods that otherwise would be thrown away, etc.

#### 3.4 Empowering consumers and public buyers

There are certain measures and campaigns addressing consumers related to waste prevention, such as mandatory charging of plastic bags, the Waste Prevention Portal, national Eco-label, GPP as well as campaigns related to separate waste collection. Even though there are certain measures and campaigns toward consumers related to waste prevention, such as mandatory charging of plastic bags the Waste Prevention Portal, national Ecolabel, GPP as well as campaigns related to separate waste collection, Croatia lacks more determined measures. Such measure should deal with empowering consumers and public buyers to enhance the participation of consumers and public buyers in the circular economy initiatives, e.g. local area/neighbourhood initiatives, web based tools to find new users for goods that otherwise would be thrown away, etc.

The national Croatian ecolabel "Environmental Friendly Label" has been established in addition to the EU Ecolabel which is applicable in all EU MS. National Croatian ecolabel "Environmental Friendly Label" criteria include the possibility of recycling after the end of the product life cycle as well as environmental impacts during pre-production. The national ecolabel does not include durability and recycled content in products. Furthermore reparability criteria is missing in order to highlight products that contribute to more circularity. The national ecolabel criteria include the possibility of recycling after the end of the product life cycle as well as environmental impacts during pre-production. The national ecolabel does not include durability and recycled content in products, also reparability criteria is missing in order to highlight products that contribute to more circularity.

The National Action Plan for Green Public Procurement covers priority groups of products and services: printing and copying paper, motor vehicles, electricity, cleaning services, telecommunications services and mobile telephony services together with devices, and office and information equipment (IT equipment). The green criteria covers aspect of circularity such as usage of recycled paper, replacement of parts, packaging made of recycled material, easily disassembled devices and availability of spare parts depending on the type of product and service. The Plan is missing more holistic consideration of environmental impacts and waste creation across the whole lifecycle of goods and services. The Plan is missing circularity procurement measures such as supplier take-back system, reparability of products, external reuse/sale of products, internal reuse of products, recyclable materials, recycled content, resource efficiency etc. In addition, the number



of products that the national GPP is covering is relatively narrow. As the GPP scheme is voluntary, it is not often applied by public administration.

At present, Croatian national legislation and data collection system does not enable waste data breakdown on different types of polymers (except PET, for which the data is available in EPR database). This is important request, to be taken into account in preparation of future data collection methodologies, forms, and surveys. In addition, there is a need for companies to be informed and educated on the new rules on calculating recycling, classification and transboundary movements of plastic waste. For the above reasons, MINGOR databases are not sufficient to be used directly for reporting under 3 Directives, but could mainly be used for validation procedures and for crosschecks.

As to the waste prevention – for citizens, general measures directed to municipal waste prevention could be adequate, but more examples of good practice, projects and activities focused on plastic waste prevention in industry should be collected and uploaded at the Waste Prevention Portal. This includes the information on use of two possible instruments to declare by-product or end-of-waste status for materials that usually was waste.

To improve our knowledge on plastic products and plastic waste generation and management, there is a need to adapt and modify data collection system and waste information system in accordance with the requests set in three directives. There is a need to organize collection of certain new data, as well as to work on improvement of the quality of existing data. This shall be done in order to monitor implementation of three directives at national level in a way that the harmonization of methods and comparability of data is ensured at EU level, and the data quality is improved. Therefore, the MARLESS Project activities should contribute to the implementation of European Statistical Programme.

#### 4. Policy Gap Analysis for Italy

The New Salvamare Law of May 17, 2022 n.60 set anew starting point and for sure impoved the management of marine litter considering that can be considered the first one that really speacks about matine litter issue.

On 10 June 2022, Law No.60 of 17 May 2022 on "Provisions for the recovery of waste at sea and in inland waters and for the promotion of the circular economy" was published, which entered into force on 25 June 2022. The aim of the Law is to contribute to the rehabilitation of the marine ecosystem and the promotion of the circular economy, as well as to the awareness of the community for the dissemination of virtuous behavioural models aimed at preventing the abandonment of waste in the sea, in lakes, rivers and lagoons and the proper management of waste.



The Act stresses the following definitions concerning inland waters:

- a. "accidentally caught waste" means waste collected at sea, in lakes, rivers and lagoons by nets during fishing operations and that collected occasionally at sea, in lakes, rivers and lagoons by any means;
- b. "waste voluntarily collected" means waste collected by means of waste capture systems, provided that it does not interfere with the eco-systemic functions of water bodies, and during the cleaning campaigns of the sea, lakes, rivers and lagoons referred to in letter c);
- c. "clean-up campaign" means the initiative planned to clean up the sea, lakes, rivers and lagoons in accordance with the conditions laid down in Article 3;
- d. "awareness campaign" means activities aimed at promoting and disseminating models behavioural virtuous prevention of the abandonment of waste at sea, in lakes, rivers and lagoons;
- e. "competent authority" means the municipality having territorial jurisdiction;
- f. "promoter of the cleaning campaign": the subject, among those qualified to participate in the cleaning campaigns for the sea, lakes, rivers and lagoons in accordance with Article 3, paragraph 3, which submits to the competent authority the request referred to in the aforementioned Article 3, paragraph 1;

#### The highlights of the Salvamare Law are the following:

- 1. Without prejudice to the provisions of this Article, incidental waste caught shall be treated as waste from ships within the meaning of point 3 of the first paragraph of Article 2, of Directive (EU) 2019/883 of the European Parliament and of the Council
- 2. The master of the vessel or the driver of the vessel calling at a port shall transfer the waste accidentally caught at sea to the port reception facility. In the case of the mooring of a vessel in areas not covered by the territorial competence of a port system authority, the territorially competent municipalities shall provide that the waste is delivered to appropriate collection facilities, whether or not temporary, fitted out near berths.
- 3. The master of the vessel landing in a small non-commercial port shall transfer the accidentally caught waste to port reception facilities integrated into the municipal waste management system.
- 4. The supply of accidentally caught waste to the port facility of collection, after weighing of the same at the time of delivery, is free of charge for the conferent
- 5. For the purpose of distributing the charges referred to in this Article throughout the national community, the costs of managing incidental waste caught shall be covered by a specific component added to the waste tax
- 6. By decree of the Minister for Agricultural Food and Forestry Policies, in agreement with the Minister for Ecological Transition, to be adopted within four months of the date of entry into force of this Act, reward measures shall be identified, with the exception of economic provisions, to the master of the fishing



vessel subject to compliance with the obligations laid down in this Article, which do not affect the protection of the marine ecosystem and compliance with safety rules.

- 7. Waste collected voluntarily may also be collected by means of waste capture systems, provided that they do not interfere with the eco-systemic functions of water bodies, and as part of specific cleaning campaigns organised on the initiative of the competent authority. Are promoters of cleaning campaigns:
  - a) -the managing bodies of protected areas
  - b) -the environmental associations
  - c) -fishermen's associations
  - d) -fishing cooperatives and enterprises, as well as their consortia
  - e) -sports and recreational fishermen's associations
  - f) -sports associations of divers and boaters
  - g) -the professional associations
  - h) -diving and diving training centers
  - i) -the managers of bathing establishments
  - j) -Third sector entities
  - k) -non-profit organizations of social utility
  - social promotion associations
  - m) -foundations and associations with the purpose of promoting and protecting and safeguarding natural and environmental assets
  - n) -other entities identified by the competent authority.
  - o) The managing bodies of protected areas may also carry out, also in consultation with the representative bodies of fish entrepreneurs, public communication and environmental education initiatives to promote the campaigns referred to in this article.
- 8. In order to promote the recycling of plastics and other materials not compatible with the marine ecosystem and inland waters, the Minister for Ecological Transition shall establish the criteria and modalities for accidentally caught waste and waste voluntarily collected cease to be classified as waste
- 9. In order to reduce the impact of marine pollution from rivers, the District Basin Authorities shall introduce, in their planning acts, experimental measures in watercourses to capture floating waste, compatible with the needs of water and ecosystem protection
- 10. by 31 March 2022, the Ministry of Ecological Transition shall initiate a three-year experimental programme for the recovery of plastics in rivers most affected by this form of pollution, including by the installation of floating instruments
- 11. Awareness campaigns can be carried out regarding the protection of the marine environment, for the achievement of the aims expressed in the Salvamare Law and the objectives contained in the 2030 Agenda for sustainable development, adopted by the UN General Assembly on 25 September 2015.
- 12. In order to provide fishermen and operators with adequate information on the way in which accidentally caught or voluntarily collected waste is delivered, appropriate forms of advertising and awareness-raising by the port system authorities or by the municipalities territorially competent in the field of municipal waste management pursuant to Article 198 of the Legislative Decree of 3 April 2006, n. 152, including



- through technical protocols to ensure the mapping and advertising of harvesting areas and maximum simplification for fishermen and operators
- 13. The Ministry of Education promotes, in schools of all levels and levels, activities aimed at making pupils aware of the importance of the conservation of the environment and, in particular, of the sea and inland waters, and the correct conditions for the transfer of waste
- 14. The schools also promote good waste delivery practices and the recovery and reuse of goods and products at the end of the cycle, including with regard to the reduction of the use of plastics and the reuse systems available.
- 15. In the Amendment to Article 52 of the code referred to in Legislative Decree No. 171 of July 18, 2005 the following words are added at the end: "also with reference to measures to prevent and combat the abandonment of waste at sea".
- 16. To fish farmers who, in the course of their activities, take part in cleaning campaigns or give the accidentally caught waste an environmental recognition attesting to the commitment to the environment
- 17. Provision is also made for municipalities to implement an incentive system for respect for the environment aimed at awarding recognition to boat owners, not engaged in professional activities, who recover and deliver ashore plastic waste accidentally caught or voluntarily collected.
- 18. In order to coordinate action to combat marine pollution, including that due to plastics, the Permanent Inter-Ministerial Consultation Table is established at the Ministry of Ecological Transition.
- 19. The Minister of Ecological Transition submit to the Chambers, by December 31 of each year, a report on the implementation of this law → We are waiting for...?

#### 5. Conclusion:

Current Croatian strategic documents do not adequately tackle Circular Economy topics yet. As Croatia entered the EU in 2013 it adopted its main strategic documents at the time of accession of prior to accession. Circular Economy has become a main policy topic in EU only later, namely when the EU adopted the first CE Action Plan in 2015. Currently there is a new cycle of drafting strategic documents and therefore a good opportunity to adequately include main CE policies at the national strategic level. This has already being done in the draft of the new Agriculture Strategy until 2030 and the Energy development strategy of the Republic of Croatia until 2030 with a view to 2050. As concerns waste management according to our assessment Croatia needs to do more in order to further develop and modify the institutional framework for the waste management system to function in accordance with market principles and the principles of CE. Although the prospects for establishing a circular economy in Croatia are promising, strategic integration and sectoral activities are often insufficient. The CE philosophy requires the cooperation and coordination of all relevant sectors and stakeholders, both public and private, in order to achieve more circularity in the Croatian economy. An integrated Circular Economy Strategy developed with broad stakeholder engagement could substantially support and promote CE approaches in Croatia.



While on the Italian side the legislative framework have been updated during the MARLESS project implementation, and the concept of Marine Litter management became a central part of a new law called Salvamare but besides that, the real management of fished waste and abandoned waste along rivers seems to be still quite confusioanry.

Moreover, many articles of the Salvamare law still needs an implementation decree that have still not realized. This delay is creating a confusing situation and most of the time is slowing down a concrete management of waste.

In other cases, like the waste that flows along rivers, even if some Italian Regions publisched a Regional decree that identify the different competences of the public bodies for the abandoned waste, on the practical case thaehe is a lack in the implementation, sometimes due also to the costs that derives from the waste collection, transportation and management.

All of this problems can be summarized in one sentence: "If the waste in not well managed on land, we will find it in the sea".

Of course the soution it's not easy and will require several steps, but a clear legislative path is needed to achieve concrete and feasible results.