Annex 8 Analysis of compliance of the NWMP content (including WPP) with the requirements defined by EU legislation

Table 1 - Analysis of compliance of the NWMP content with the requirements defined by EU legislation (directives amended by Waste Package, SUPD)

Number of NWMP Chapter / Subchapter (Number and Name)	Compliant with WFD requirement	Article of EU Directive	Recommendation
General information	n/a	n/a	Information on the application period and the status of legal adoption, waste management plan for the national level is given in NWPM. This general information should be also part of the revised NWMP.
1 Waste management status in the republic of Croatia	Partially	WFD	
1.1 Origin, composition, categories and types of waste	Partially	Article 28 (3)	
1.1.1 Total quantities of waste	Yes	The waste management plans shall contain, as appropriate and taking into account the geographical level and coverage of the planning area, at least the following:	Data on total quantities of produced waste (by origin) and treated waste (by the type of treatment) are given for the year 2014. It is necessary to update sub-chapter with the latest available data, as well as give more detailed overview of waste amounts from manufacturing sector.
1.1.2 Municipal waste	Yes	(a) the type, quantity and source of waste generated within the territory, the waste likely to be shipped from or to the national territory, and an evaluation of the development of waste streams in the future;	Data on municipal waste are presented at a satisfactory level of detail on the national and regional level. It is necessary to update sub-chapter with the latest available data and to give more detailed overview for local level.
1.1.3 Production waste	Yes	(b) existing major disposal and recovery installations, including any special arrangements for waste oils, hazardous waste, waste containing significant amounts of critical raw materials, or waste streams addressed by specific Union legislation; (cb) an assessment of existing waste collection schemes, including the material and territorial coverage of separate collection and measures to improve its operation, of any derogations granted in accordance with Article 10(3), and of the need for new	This chapter is partially covered by chapter 1.1.1. Total quantities of waste, where beside waste amounts, waste origin by NACE activities is presented. It is recommended to merge these two sub-chapters (1.1.1. and 1.1.3.).
1.1.4 Hazardous waste	Yes		Data on hazardous waste are presented at a satisfactory level of detail. It is necessary to update sub-chapter with the latest available data.
			Data on special waste categories are presented at a satisfactory level of detail except for waste ships and marine waste where analysis is missing. Regarding sub-chapter on biowaste, it is recommended to give greater emphasis on food waste. It is necessary to update the whole sub-chapter with the latest
1.1.5 Special categories of waste Part	Partially	collection schemes; (d) historical contaminated waste disposal sites and measures for their rehabilitation	available data. Additionally, when updating the chapter on packaging waste provisions of the Article 28(5) WFD and Article 14 PPWD should be considered, according to which the WMP should include a specific chapter on
		PPWD Article 14 (Management Plans)	packaging and packaging waste including waste prevention measures and measures for reuse that have been taken. This chapter contains sub-chapter on packaging waste but it should be amended with information on waste prevention measures and measures for reuse

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		In pursuance of the objectives and measures referred	that have been taken
1.1.6 Transboundary movement of waste	Yes	to in this Directive, ember States shall include in the waste management plans required pursuant to Article 17 of Directive 75/442/EEC, a specific chapter on the	Data on transboundary movement of waste are presented at a satisfactory level of detail. It is necessary to update sub-chapter with the latest available data.
1.2 Existing facilities, devices and systems for waste management	Partially	management of packaging and packaging waste, including measures taken pursuant to Articles 4 and 5.	
1.2.1. Facilities and devices for waste management	Partially		Data on facilities and devices for waste management are presented at a satisfactory level of detail except for recycling facilities and sorting plants, where good source of data and information could be ensured by implementation of NWMP measure aimed at determination of lack of recycling capacities, yet there are delays in implementation of this measure. It is necessary to update sub-chapter with the latest available data and amend with missing data.
			Furthermore, depending on infrastructure measures that will be part of the NWMP for the period 2023-2028, to meet the WFD requirement regarding required assessment of the need for new collection schemes, the closure of existing waste installations, additional waste installation infrastructure, within NWMP as a part of need assessment provide data on existing energy recovery capacity.
1.2.2 Current waste management systems	Partially		Considering that in recent years quality and comprehensiveness of the data within waste management information system has improved, assessment of current waste management (collection schemes) should be more detailed and comprehensive. This especially relates to medical waste and construction waste management. The assessment based on the latest available data should be done.
1.2.3 Municipal waste public collection service	Yes		Data on municipal waste public collection service are presented at a satisfactory level of detail. It is necessary to update sub-chapter with the latest available data.
1.2.4 An overview of the companies providing some of the waste management activities	Yes		Data on waste management companies are presented at a satisfactory level of detail. It is necessary to update sub-chapter with the latest available data.
1.3 Status of "hot spot" remediation projects	Yes		Data on status of "hot spot" remediation projects are presented at a satisfactory level of detail. It is necessary to update sub-chapter with the latest available data which will be possible after the implementation of measure Identifying new locations polluted by hazardous waste ("hot spots").
2 Main goals of waste management	Partially	WFD Article 28 (3)	Chapter presents data at a satisfactory level of detail. However, when it comes about list of EU targets (NWMP Table 10), it will be needed to align it with new goals from "Waste Package".

Number of NWMP Chapter / Subchapter (Number and Name)	Compliant with WFD requirement	Article of EU Directive	Recommendation
		(g) appropriate qualitative or quantitative indicators and targets, including on the quantity of generated waste and its treatment and on municipal waste that is disposed of or subject to energy recovery.	Regarding national targets defined by this Chapter (Table 11), there are some recommendations for improvements. In this Chapter specific national waste prevention goal is defined, Subtarget 1.1 - Decrease the total quantities of produced municipal waste by 5% in relation to the total produced quantities of municipal waste in 2015. At EU level mandatory quantitative waste prevention target is not defined. WFD only specifies a minimum set of prevention measures that have to be included in the MS prevention programmes. By the end of 2024 15 EC will examine the feasibility of setting waste reduction targets, and if appropriate, prepare legislative proposal. It is recommended not to introduce quantitative waste prevention targets if that is not mandatory according to the EU legislation. It would be opportune to define qualitative waste prevention targets. Furthermore, NWMP quantitative sub-target 1.2 Separately collect 60% of mass of produced municipal waste (primarily paper, glass, plastic, metal, bio-waste etc.) is defined for source separation of municipal waste, and in regards to the reference year 2015, while EU target is defined for preparation for re-use and recycling of municipal waste fractions rather than just collected, and it is an annual target. When taking into account the fact that during the preparation for re-use and recycling of separately collected waste at source, impurities are extracted in a significant proportion, it is questionable whether this NWMP target is in line with the WFD target. This especially relates to the bulky waste, which after sorting in significant quantities, still ends up in a landfill. Additionally, it is not clearly defined what municipal waste fractions (apart from paper, plastic, glass, metal, bio-waste and bulky waste) are included in NWMP sub-target for separate collection of municipal waste. Recycling target on municipal waste aligned with EU legislation is defined within Act on Sustainable Waste Management. Having two sets of targets in force makes monitoring m

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			Again, sub-target 2.1. Separately collect 75% of mass of produced construction and demolition waste defined in NWMP aims to strengthen separate collection of construction waste, while EU target (which is transposed in Act on Sustainable Waste Management) defines obligation for the re-use and recycling.
			It would be more efficient to have only one set of quantitative targets, identical to EU ones.
			Although the qualitative targets support improvement of waste management system and fulfilment of EU waste management legislation requirements, it would be reasonable to reconsider exclusion of some (sub)targets.
			Qualitative Sub-target 2.5 Establish waste management system for waste ships, wrecks and sunken things on the seabed and measures related to wrecks and sunken objects on the seabed, fall under the jurisdiction of the Ministry of the Sea, Transport and Infrastructure, hence it would be more efficient to integrate them into the strategic and/or planning documents under that authority, while ship management should be covered by NWMP Sub-target 2.6 Improve waste management system of other special waste categories as it is about special waste category. Since Target 7 Improve supervision of waste management and Target 8 Improve administrative procedures in waste management present regular work of competent authorities, therefore it is not recommendable to be defined as a separate targets in NWMP. Additionally, Target 7 falls under the jurisdiction of State Inspectorate, and therefore should not be the scope of the NWMP. Detailed information on measures evaluation is presented in Chapter Error! Reference source not found Additionally, in the NWMP there are no indicators for monitoring the implementation progress of measures, indicators make part of the NWMP ID. It is recommendable to that NWMP consists those indicators as is the case with WPP.
Waste flow development estimation, needs and methods of establishment of new systems and facility networks and devices for waste management	Partially	WFD Article 28 (3)	
3.1 Municipal waste	Yes	(c) an assessment of the need for closure of existing waste installations, and for additional waste	Chapter presents data at a satisfactory level of detail but it is necessary to revise the estimation of the total quantities of produced municipal

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		installation infrastructure in accordance with Article 16. Member States shall ensure that an assessment of the	and biodegradable waste. According to the publicly available Report on municipal waste, amounts of municipal waste generated in 2019 exceeded estimated amount for 2025.	
3.1.1 Waste prevention	Yes	investments and other financial means, including for local authorities, required to meet those needs is carried out. This assessment shall be included in the	Chapter presents data at a satisfactory level of detail but it is necessary to align it with Waste Package provisions related to waste prevention (Article 9 WFD).	
3.1.2 System for separate collection of municipal waste	Yes	relevant waste management plans or in other strategic documents covering the entire territory of the Member State concerned;	Chapter presents data at a satisfactory level of detail but it is necessary to align it with definitions stipulated by Act on Sustainable Waste Management and belonging by-laws. However, it is recommendable not to include definitions from other legislation in the NWMP, since they are subject to frequent changes (e.g. for recycling yards, the minimum number of inhabitants in the LSGU that requires the construction of a recycling yard etc.). In the part of envisaged dynamics of meeting goals 1.2 (Figures 25 and Figures 26) revisions should be done in line with revisions of NWMP targets and revision of estimations of municipal waste generation.	
3.1.3 Waste management centre (WMC)	Partially		presented, to meet the WFD requirement reg assessment of the need for new collection sol existing waste installations, additional waste within NWMP as a part of need assessment in	Although in the NWMP ID needed capacities for new WMC are presented, to meet the WFD requirement regarding required assessment of the need for new collection schemes, the closure of existing waste installations, additional waste installation infrastructure, within NWMP as a part of need assessment information on needed capacities for new waste management centers have to be provided.
3.1.4 Landfills	Partially		Although in the NWMP ID the dynamic of the closure of existing landfills is presented, to meet the WFD requirement regarding required assessment of the need for new collection schemes, the closure of existing waste installations, additional waste installation infrastructure, within NWMP as a part of need assessment information on the closure of existing landfills and needed capacities for new landfills have to be provided. Also, it is necessary to align the definition of landfill with definition stipulated by Act on Sustainable Waste Management and belonging by-	
			law. However, it is recommendable not to include definitions from other legislation in the NWMP, since they are subject to frequent changes. Assessments for waste tyres, end of life vehicles, asbestos waste,	
3.2 Special categories of waste	Partially		WEEE, waste batteries and accumulators, waste ships and marine waste are missing.	
3.2.1 Bio-waste	Partially		It is necessary to make new assessment based on the latest available data.	

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			To meet the WFD requirement regarding required assessment of the need for new collection schemes, the closure of existing waste installations, additional waste installation infrastructure, within NWMP as a part of need assessment information on the needed capacities have to be provided.
			In the case of abolition of target on bio-waste separate collection, it is necessary to move Figure 27.
			It is necessary to make new assessment based on the latest available data, since at the time of creating NWMP, a lack of reliable and complete data on quantities of produced textile and technologies for the treatment of this type of waste was determinate.
3.2.2 Textile and footwear waste	Partially		To meet the WFD requirement regarding required assessment of the need for new collection schemes, the closure of existing waste installations, additional waste installation infrastructure, within NWMP as a part of need assessment information on the needed capacities have to be provided.
			This chapter is presented at a satisfactory level of detail, but it is necessary to make new assessment based on the latest available data. New estimation of total quantities of produced packaging waste and quantities of produced packaging material
3.2.3 Packaging waste	Partially		for the next period is needed. To meet the WFD requirement regarding required assessment of the need for new collection schemes, the closure of existing waste installations, additional waste installation infrastructure, within NWMP
			as a part of need assessment information on the needed capacities have to be provided.
3.2.4 Medical waste	Partially		It is necessary to make new assessment based on the latest available data and define need for additional infrastructure in more detail.
3.2.5 Waste oils	Partially		It is necessary to make new assessment based on the latest available data and define need for additional infrastructure in more detail.
3.2.6 Waste polychlorinated biphenyls and terphenyls	Yes		This chapter is presented at a satisfactory level.
3.2.7 Construction and demolition waste	Partially		It is necessary to make new assessment based on the latest available data and define need for additional infrastructure in more detail, since at the time of creating NWMP, a lack of reliable and complete data was determinate.
3.2.8 Residual sludge from waste water treatment facilities	Yes		This chapter should be revised in line with the results of an Action plan for the use of residual sludge from wastewater treatment facilities on suitable surfaces which is envisaged as a Measure 2.2.1. within NWMP.

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3.3 Production waste	No		This chapter is unnecessary since all other waste categories almost entirely cover production waste (biowaste, packaging waste, construction waste, hazardous waste, waste oils etc.).
3.4 Hazardous waste	Yes		This chapter should be revised in line with the results of a NWMP Measure 3.1. that includes the conduction of a feasibility study, in which current capacities for hazardous waste treatment in the RC will be analysed, and needed capacities determined.
4 Criteria for determining planned locations and the necessary capacities of new facilities and plants	Yes	WFD Article 28 (3) (d) sufficient information on the location criteria for site identification and on the capacity of future disposal or major recovery installations, if necessary;	
4.1 Criteria for determining planned locations of new facilities and plants	Yes		This chapter is presented at a satisfactory level. Revision to align with policy currently in force.
4.2 Criteria for determining the necessary capacities of new facilities and plants	Yes		This chapter is presented at a satisfactory level, but it is necessary to revised it according to the latest available data (new OPCC and possible source of funding). It is recommendable not to refer to specific legislation and documents like EU Regulation 1303/2013, since they are subject to frequent changes.
5 General technical requirements for facilities and plants	Yes	WFD Article 28 (3) (e) general waste management policies, including planned waste management technologies and methods, or policies for waste posing specific management problems;	This chapter is presented at a satisfactory level, but it is necessary to revise it according to the latest available information. It is recommendable not to refer to specific legislation since it is subject to frequent changes.
6 Organisational aspects of waste management and division or responsibility between private and public subjects working in waste management	Yes	WFD Article 28 (4) (a) organisational aspects related to waste management including a description of the allocation of responsibilities between public and private actors carrying out the waste management;	This chapter is presented at a satisfactory level, but it is necessary to revised it according to the latest available information.
7 Measures for plan execution	Partially	WFD Article 28 (3) (f) measures to combat and prevent all forms of littering and to clean up all types of litter; (ca) information on the measures to attain the objective laid down in Article 5(3a) of Directive	This chapter together with NWMP ID is presented at a satisfactory level of detail. In this Chapter measures for achievement of targets are presented. Detail activities and projects, including timeline for implementation, indicatorsare given in NWMP ID. Regarding defining responsible bodies for the implementation of specific measure, it is recommendable to define one responsible body

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		1999/31/EC¹ or in other strategic documents covering the entire territory of the Member State concerned; Article 28 (4) (c) the use of awareness campaigns and information provision directed at the general public or at a specific set of consumers; (d) historical contaminated waste disposal sites and measures for their rehabilitation.	instead several of them. Detailed results of evaluation of WPP measures is presented in the Chapter Error! Reference source not found. of this Report and the proposal of some new measures in the Chapter Error! Reference source not found. of this Report.
8. Projects of importance for the execution of the waste management plan	n/a	n/a	This chapter is presented at a satisfactory level of detail.
9. Waste prevention plan	See Table 2	See Table 2	Table 2
10 Financial assets for the execution of plan measures	Partially	Article 28(3) (c) an assessment of the need for closure of existing waste installations, and for additional waste installation infrastructure in accordance with Article 16. Member States shall ensure that an assessment of the investments and other financial means, including for local authorities, required to meet those needs is carried out. This assessment shall be included in the relevant waste management plans or in other strategic documents covering the entire territory of the Member State concerned;	When revising this chapter, it has to be considered that an assessment of the investments and other financial means required to meet those needs, is necessary to be carried out also for local/regional authorities level.
11 Estimating usefulness and appropriateness of economic instruments in waste management with unburdened function of the inner market	Partially	WFD Article 28 (4) (b) an evaluation of the usefulness and suitability of the use of economic and other instruments in tackling various waste problems, taking into account the need to maintain the smooth functioning of the internal market;	This chapter is presented at a satisfactory level, but it is necessary to revised it according to the latest available information and new economic instruments which will be introduced (e.g. landfill use fee envisaged by Draft proposal of Act on sustainable waste management).

¹ 3a. Member States shall endeavour to ensure that as of 2030, all waste suitable for recycling or other recovery, in particular in municipal waste, shall not be accepted in a landfill with the exception of waste for which landfilling delivers the best environmental outcome in accordance with Article 4 of Directive 2008/98/EC. Member States shall include information on the measures taken pursuant to this paragraph in the waste management plans referred to in Article 28 of Directive 2008/98/EC, or in other strategic documents covering the entire territory of the Member State concerned.

Table 2 - Analysis of compliance of the WPP content with the requirements defined by EU legislation (directives amended by Waste Package, SUPD)

Number of NWMP Chapter / Subchapter(Number and Name)	Compliant with WFD requirement	Article of EU Directive	Recommendation
9.1 Waste prevention	n/a	n/a	This chapter is presented at a satisfactory level, but as general information on waste prevention are presented it is necessary to revised it according to the latest available information (new long-term EU strategic planning documents, etc.)
9.2 Current state of waste prevention	Yes	WFD Article 29 (2) When establishing such programmes, Member States shall, where relevant, describe the contribution of instruments and measures listed in Annex IVa to waste prevention and shall evaluate the usefulness of the examples of measures indicated in Annex IV or other appropriate measures. The programmes shall also describe existing waste prevention measures and their contribution to waste prevention.	This chapter is presented at a satisfactory level, but it is necessary to revised it according to the latest available information, especially considering the fact that a lot of WPP measures are being implemented.
9.3 Goals and priorities	Yes	WFD Article 9 (3) 3. Member States shall monitor and assess the implementation of the waste prevention measures. For that purpose, they shall use appropriate qualitative or quantitative indicators and targets, notably on the quantity of waste that is generated.	This chapter is presented at a satisfactory level, but it is necessary to revised it according to the latest available information.
9.4 Waste prevention measures	Partially	WFD Article 9 (waste prevention measures are given in Annex 3 of this Report) SUPD Article 4 (Consumption reduction) 1. Member States shall take the necessary measures to achieve an ambitious and sustained reduction in the consumption of the single-use plastic products listed in Part A of the Annex, in line with the overall objectives of the Union's waste policy, in particular waste prevention, leading to a substantial reversal of increasing consumption trends. Those measures shall achieve a measurable quantitative reduction in the consumption of the single-use plastic products listed in Part A of the Annex on the territory of the Member State by 2026	To a large extent measures defined in WPP meet the WFD requirements. Prevention measures from paragraphs 1 (b), (c), (e), (k), and (i) of Article 9 WFD, are not sufficiently included in current WPP. They are mainly related to encouraging reusable product design and encouraging re-use and repair in general, product design that will reduce use of critical raw materials. Additionally, according to paragraph 2 of Article 29, WPPs (where relevant) have to evaluate usefulness of the examples of measures indicated in Annex IV WFD what currently is missing in the WPP. Measures indicated in Annex IV WFD are given in Annex ? of this Report. When it comes about SUPD, requirements defined by Articles 4 and Articles 10 should be considered during revision of WPP measures. These requirements refer to the need to take the necessary measures to achieve an ambitious and sustained reduction in the consumption of the single-use plastic products and to take measures awareness raising.

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	requirement	By 3 July 2021, Member States shall prepare a description of the measures which they have adopted pursuant to the first subparagraph, notify the description to the Commission and make it publicly available. Member States shall integrate the measures set out in the description into the plans or programmes referred to in Article 11 upon the first subsequent update of those plans or programmes in accordance with the relevant legislative acts of the Union governing those plans or programmes, or into any other programmes drawn up specifically for that purpose. The measures may include national consumption reduction targets, measures ensuring that re-usable alternatives to the single-use plastic products listed in Part A of the Annex are made available at the point of sale to the final consumer, economic instruments such as instruments ensuring that those single-use plastic products are not provided free of charge at the point of sale to the final consumer and agreements as referred to in Article 17(3). Member States may impose marketing restrictions in derogation from Article 18 of Directive 94/62/EC for the purposes of preventing such products from becoming litter in order to ensure that they are substituted with alternatives that are re-usable or do not contain plastic. The measures may vary depending on the environmental impact of those single-use plastic products over their life cycle, including when they become litter. Measures adopted pursuant to this paragraph shall be proportionate and non-discriminatory. Member States shall notify the Commission of those measures in accordance with Directive (EU) 2015/1535 of the European Parliament and of the Council (23) where so required by that Directive. In order to comply with the first subparagraph of this paragraph, each Member State shall monitor the single-use plastic products listed in Part A of the Annex placed on the market and the reduction measures taken and shall report on progress made to the Commission in accordance with paragraph 2 of this Article and	Detailed results of evaluation of current WPP measures are presented in the Chapter Error! Reference source not found. of this Report and the proposal of some new measures is presented in the Chapter Error! Reference source not found. of this Report.

Number of NWMP Chapter / Subchapter(Number and Name)	Compliant with WFD requirement	Article of EU Directive	Recommendation
Subchapter(Number and Name)		quantitative Union targets for consumption reduction. Article 10 (Awareness raising measures) Member States shall take measures to inform consumers and to incentivise responsible consumer behaviour, in order to reduce litter from products covered by this Directive, and shall take measures to inform consumers of the single-use plastic products listed in Part G of the Annex and users of fishing gear containing plastic about the following: (a) the availability of re-usable alternatives, re-use systems and waste management options for those single-use plastic products and for fishing gear containing plastic as well as best practices in sound waste management carried out in accordance with Article 13 of Directive 2008/98/EC; (b) the impact of littering and other inappropriate waste disposal of those single-use plastic products and of fishing gear containing plastic on the environment, in particular on the marine environment; and (c) the impact of inappropriate means of waste disposal of those single-use plastic products on the sewer network. Article 11 (Coordination of measures) Without prejudice to the first subparagraph of Article 4(1) of this Directive, each Member State shall ensure that the measures taken to transpose and implement this Directive form an integral part of and are consistent with its programmes of measures established in accordance with Article 13 of Directive 2008/56/EC for those Member States that have marine waters, the programmes of measures established in accordance with Article 11 of Directive 2000/60/EC, waste management plans and waste prevention programmes established in accordance with Articles 28 and 29 of Directive 2008/98/EC and the waste reception and handling plans established under Directive (EU) 2019/883. The measures that Member States take to transpose and implement Articles 4 to 9 of this Directive shall comply with Union food law to ensure that food hygiene and	
		food safety are not compromised. Member States shall encourage the use of sustainable alternatives to single- use plastic where possible for materials intended to come	

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Number of NWMP Chapter / Subchapter(Number and Name)	Compliant with WFD requirement	Article of EU Directive	Recommendation
		into contact with food.	
Program for the implementation of the Plan for prevention and reduction of food waste of the Republic of Croatia 2019 - 2022	Yes	WFD Article 29 (2a) Member States shall adopt specific food waste prevention programmes within their waste prevention programmes	In June 2019 Food Waste Prevention Plan of the Republic of Croatia for the Period 2019-2022 (OG 61/19) is adopted. This Plan is accompanied by a detailed Program for its implementation. Competent body for its preparation and proposing to the Government is Ministry of agriculture.