



ASSOCIAZIONE ITALIANA
COMPOSTAGGIO

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Roma December 7th 2018

Sarah NELEN
Head of Unit
Waste Management & Secondary materials (B3)
European Commission
Directorate-General for the Environment
Directorate Circular Economy & Green Growth
BU-9 05/184 (post address: B-1049 BXL)
Avenue de Beaulieu 9, 1160 BXL

Subject: establishing rules for the calculation for Directive 2008/98/EC

Dear Madam,

I am writing on behalf of the Italian Association for Composting (AIC). Our association is promoting small scale composting in every situation where it is possible. Among our members there are many professionals in the sector and several municipalities. Under our approach small scale composting should be supported following the proximity and the subsidiarity principle which is also a main pillar of the EU actions (Maastricht 1992).

We received copy of the draft document entitled “*Establishing rules for the calculation, verification and reporting of data for verifying compliance with the targets set in Article 11(2) and (3) of Directive 2008/98/EC of the European Parliament and of the Council on waste*”.

We express here our worrying about article 3 point 5 where it is stated: “*Biowaste that is separated and recycled at source at home or as part of private or community initiatives that are not managed by establishments or undertakings managing waste shall not be included in the amount of municipal waste that is generated and recycled.*”

To compute, even through a simple estimation, the contribution of private or community composting to the achievements of the targets is a strong support of the efforts that several families and communities are carrying out. On the other end the lack of such support will jeopardize a well-established and successful practice of local empowerment.

We believe the draft document contradicts the Directive 2008/98/EC (as amended by 851/2018/EC) as “*the Commission shall adopt by 31 March 2019 implementing acts establishing rules for the calculation, verification and reporting of data, in particular as regards...bio-waste separated and recycled at source” (art.11), “*bio-waste is either separated and recycled at source...*” (art. 22 point 1) and finally “*Member States shall take measures to encourage home composting” (art. 22 point 2).**

Because of this we strongly ask for changing “shall not be included” with “shall be included” or removing the whole point 5 from the document.

Thank you for your attention

Regards

Fabio Musmeci
AIC President