

# LOCAL REPORT FOR CIRCULAR ECONOMY CRITICAL FACTORS (D.T1.2.4)

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# 1. Assessment of critical factors for modelling closed-loop systems in the selected industrial park

## 1.1. Basic Pilot Area Characterization

**Table 1: Pilot Area Description**

Name / Location Pilot Area: Split – Dalmatian County
Number of Enterprises in the Pilot Area: According to the analyses which was made for our Pilot area, <b>50</b> industrial waste companies were first selected. With a more detailed selection, <b>11</b> manufacturing companies are selected for further analysis
Number of Manufacturing Enterprises in the Pilot Area: <b>11</b>
Number of Enterprises Involved in the Pilot Study include the following: SME- Small and Medium Sized entities: <u>  9  </u> Large-sized entities*: <u>    2    </u> Industrial Sectors: ( <u> 54 </u> % manufacturing (non-food), <u> 27 </u> % food industry, <u> 0 </u> % construction, <u> 0 </u> % chemical, <u> 9,09 </u> % energy, <u> 9,09 </u> % Tourism other, please specify: ...)

\* Large-size entities are companies: Employing more than 250 employees; OR Having an annual net revenue more than 50m euros, AND having an aggregate amount of the balance sheet more than 43m euros.

## 1.2. Circular Economy Awareness and Current Practices

Please characterize your pilot area based on the factors included in Table 2 below! If feasible provide percentages for your aggregated pilot area's data.

**Table 2: Circular Economy Awareness & Current Practices in the Pilot Area**

	<b>Pilot Area Aggregated Data</b> <i>(Please fill-in)</i>
1. What percentage of the respondents have heard of the circular economy / closed loop economy?	<u> 90,90 </u> %
2. What percentage of the respondents are:	
a) Purely in a linear system.	a) <u> 9,09 </u> %
b) In a linear system with some elements of circularity within the manufacturing process.	b) <u> 18,18 </u> %
c) In a linear system with some elements of circularity, occurring outside of the company facility (a waste material is sent to a recycling facility)	c) <u> 45,45 </u> %
d) In a linear system with some elements of circularity, occurring outside of the company facility (a waste material	d) <u> 45,45 </u> %



	<b>Pilot Area Aggregated Data</b> <i>(Please fill-in)</i>
<i>is sent to another facility as a secondary raw material)</i>  e) In a circular system.	e) <u>9,09</u> %
3. What percentage of the respondents apply eco-design directives?  Which of the following design features were applied? a) Reparability b) Upgradability c) Durability d) Recyclability of products	<u>18,18</u> %  a) <u>0</u> % b) <u>0</u> % c) <u>18,18</u> % d) <u>9,09</u> %
4. What percentage of the respondents make an effort to reduce packaging waste?  If yes, how? a) Use bio-degradable materials b) Smart Design for overall reduction of materials c) Use of easily recyclable packaging	<u>81,81</u> %  a) <u>0</u> % b) <u>0</u> % c) <u>72,72</u> %

### 1.3. Scope and Availability of Preliminary Modeling Data

Please characterize your pilot area based on the factors included in Table 3 below! If feasible provide percentages for your aggregated pilot area's data.

**Table 3: Scope and Availability of Preliminary Modeling Data**

	<b>Pilot Area Aggregated Data</b> <i>(Please fill-in)</i>
What percentage of companies provided information regarding their primary material in-flows?	<u>90,90</u> %
If information was not provided, what reason(s) were given for not providing the information?  a) No reason given b) Too much hassle (not interested in cooperating) c) Confidentiality and/or Business secret d) Other	a) <u>100</u> % b) <u>0</u> % c) <u>0</u> % d) <u>0</u> %



	<b>Pilot Area Aggregated Data</b> <i>(Please fill-in)</i>
What percentage of companies provided information regarding waste generation (out-flows)? Of those that responded, generally speaking, how complete was the information? a) Complete b) Mostly complete c) Incomplete d) No information provided	__100__ %  a) __0__ % b) __100__ % c) __0__ % d) __0__ %
If information regarding was not provided, generally speaking, can the information be obtained through public records?	YES / <b>NO</b>

### 1.4. Conclusions and Recommendations for Overcoming Barriers in Obtaining Data

*Please summarize your experiences with obtaining information from companies in your Pilot Area. Give recommendations for your pilot area, which can help in obtaining material flow data- for instance, overcoming confidentiality, etc.*

There are several ways and recommendations in order to obtain material flow data in our Pilot area, Split – Dalmatia County. Companies of technological waste in which data was collected have to report their technological waste in EPR system (Environmental Pollution Register) through default application forms. That is required within the institutional framework. After interviews, we noticed that the data information collected in EPR system was different then the data information we’ve got directly from companies. Reason for that is loophole in the application forms because companies sometimes give wrong or incomplete data, or data is not available. So, the system for data collection exist, but it should be improved. The system is in the competence of Croatian Agency for the Environment and Nature (HAOP) and Ministry of Environment and Energy.

The other recommendation for obtain material flow is through the Waste Management Plan (WMP). Each municipality in the Republic of Croatia or in this case the Split – Dalmatia County, have to make WMP for the period of five years. In WMP all data from certain municipalities is collected and analyzed. But there is problem with plans, because certain municipalities are too small and do not have an optimal system for data collection or they do not have enough data for a representative sample of data. Solution or recommendation for this problem is common approach of several, small municipalities in order to collect quality waste data and to advance in the maintenance of the material flow, and therefore in overcoming mutual confidentiality.

Quantities of waste that are relevant for the Project, are the quantities reported by the waste producer (hazardous and non-hazardous) and downloaded from the mentioned EPR database and interviews with companies. For this Project official and verified data on waste quantities (source: HAOP) were used for the period 2016.

The complete analyses carried out for the purpose of this project is in the attached document *Review of waste in Split – Dalmatia County*. In the mentioned document, detailed analyses for Split – Dalmatia County was carried out and the main companies for industrial waste were selected for further analysis.

## 2. Assessment of market barriers analysis for the creation of an efficient model of industrial symbiosis

### 2.1. Local legislative environment

Please fill out the table below based on your knowledge of your Pilot Area.

**Table 4: Characteristics of Legislative Environment**

SECTOR <i>(eg. Waste, Use of specific recycled materials, Energy efficiency, Wastewater, Air emissions, Green taxes/refunds)</i>	LAW REFERENCE	TITLE OF LEGISLATION	RELEVANCY TO CIRCULAR ECONOMY	DOES THE LEGISLATION ENCOURAGE A CIRCULAR ECONOMY? (YES / NO)	DOES THE LEGISLATION CREATE A BARRIER TO A CIRCULAR ECONOMY? (YES / NO)
Environmental protection and energy efficiency	(OG 107/03, 144/12) Croatia	Act on the Environmental Protection and Energy Efficiency Fund	The purpose is improving and extending the Community system for trading greenhouse gas emission allowances.		NO
Environmental protection	(OG 80/13, 153/13, 78/15) Croatia	Nature Protection Act	Regulates the protection system and the integral conservation of nature and its parts and other related issues.		NO
Waste management	(OG No. 94/13, 73/17) Croatia	Act on Sustainable Waste Management	Defines the objectives of waste management and the measures to achieve the goals and the carriers of the measures. Includes Measure for Energy Waste Recovery Planning.		NO

Air emissions	(OG 130/11, 47/14, 61/17) Croatia	Air protection act	Regulates sustainable and correct protection measures necessary for the air protection, including climate change mitigation and adaptation to climate changes, monitoring of greenhouse gas emissions.		NO
Green taxes/refunds	(OG 59/2006, 111/2006, 109/2012, 94/2013, 93/2016) Croatia	Rulebook on Measures, Procedure and Method of Determining the Amount of Fees to Property Owners and Local Self-Government Units	Establishes the criteria, procedure and manner of determining the amount and manner of payment and the payment of compensation to owners of property located in the impact zone of the building that are included in waste disposal and management		NO
Waste	(OG 97/15) Croatia	Decree on Waste Packaging Management	Prescribes the manner of fulfilling the obligations to achieve the prescribed objectives regarding the management of packaging waste, the method of calculating the amount of compensation for the management of packaging waste, the amount of reverse charge and the method of calculating the costs for the return fee.	YES	
Waste	(OG 105/15) Croatia	Regulation on waste batteries and accumulators management	Prescribes the manner for the task of achieving the prescribed target in relation to the management of waste batteries and accumulators as well as the method of calculating the amount of compensation for management of waste batteries and accumulators.	YES	

Waste	(OG 113/16) Croatia	Ordinance on waste tires management	Lays down the procedures, objectives and conditions of waste tire, types of waste tires that must be collected separately, means of processing waste tires, the requirements for collecting and storing waste tires, the content of the program for performing the service of collecting waste tires, and other issues.	YES	
Waste	(OG No. 124/06, 121/08, 31/09, 156/09, 91/11, 45/12, 86/13) Croatia	Ordinance on waste oil management	Prescribe the manner of waste oil management, liable to pay compensation for waste oils, the types and amounts of fees paid by the bond fee, manner and deadlines for calculation and payment of compensation, the amount of fees paid to persons authorized for collection of waste oils and other issues related to management of waste oils .	YES	
Wastewater	(OG No. 38/08) Croatia	Ordinance on management of wastewater treatment sludge when used in agriculture	Prescribe the manner of waste sludge from the wastewater treatment sludge when used in agriculture.	YES	
Waste	(OG No. 128/08) Croatia	Ordinance on managing waste from research and mining of mineral raw materials	Provides measures and procedures to prevent or reduce as far as possible the harmful effects on the constituents of the environment.	YES	

Waste management	(OG No. 23/14, 51/14, 121/15, 132/15) Croatia	Ordinance on waste management	Prescribe the conditions for waste management, the work of the person in charge of waste management and the work of recycling yard.	YES	
Energy efficiency	(OG No. 42/14, 48/14, 107/14, 139/14) Croatia	Ordinance on the management of waste electrical and electronic equipment	Prescribes measures to protect the environment and human health by preventing or reducing harmful effects from the generation and management of waste from electrical and electronic equipment, as well as by reducing the overall effects of using natural resources and improving the efficiency of their use, thus contributing to sustainable development.	YES	
	(OG No. 103/14) Croatia	Ordinance on the management of polychlorinated biphenyl and polychlorinated trephines	Prescribes prohibitions and restrictions as well as any other compulsory treatment for the disposal of polychlorinated biphenyls and polychlorinated trephines (PCBs) and waste PCBs for the decontamination and disposal of equipment containing PCBs to be completely disposed of and removed	YES	
Environmental protection	(OG No. 117/14) Croatia	Ordinance on management of waste from the titanium dioxide industry	Prescribes measures for the protection of the environment and human health from the harmful effects of waste management from the production of titanium dioxide.	YES	

Use of specific recycled materials, waste	(OG No. 117/14) Croatia	Ordinance on by-products and end-of-waste status	Regulates the content of the request for registration in the Register for the elimination of waste status, and the Register of by-products, the specific criteria for the elimination of waste, including the limit values of pollutants and detrimental substances or objects in the environment, the specific criteria for the by-products, the content of a certificate of registration in the respective registers , the content and manner of keeping the relevant records, and the manner and conditions for the implementation of EU regulations setting out the criteria for abolishing the status of a particular type of waste.	YES	
Waste	(OG No. 50/15) Croatia	Ordinance on medical waste management	Prescribes the methods of waste management that arise in providing care, protection and preservation of human and / or animal health, research activities and provision of various services that come into contact with the blood and / or the secretions of humans and / or animals are regulated.	YES	
Waste	(OG 88/15) Croatia	Ordinance on packaging and waste packaging	Prescribes the procedures and objectives in the management of waste packaging, the conditions of packaging and packaging waste management, the requirements for collection, storage and processing, the obligation to keep records and deliver reports, the	YES	

			obligations of waste packaging holders and other issues related to packaging and waste packaging.		
Waste	(OG 90/15) Croatia	Ordinance on the waste catalogue	Prescribes the Waste Catalog, the cross-border waste classification and the quantity of waste considered to be negligible are prescribed.		NO
Waste	Official Gazette 99/15	Ordinance on the management of waste textiles and waste footwear	Prescribe the procedures and conditions for the management of waste textile, the requirements for collection of waste textile and footwear, the obligation and manner of fulfilling the obligations of the producer, the manner of compulsory treatment of waste textile and footwear holders, and other issues regarding waste textile and footwear.	YES	
Waste	Official Gazette 114/15	Ordinance on the methods and conditions for the landfill of waste, categories and operational requirements for waste landfills	Prescribe waste disposal categories, procedures and other conditions for waste disposal, procedures and other conditions for waste reception in underground waste disposal sites, emission limit values for waste disposal and conditions and measures related to planning, construction, operation and closure of landfills and acting after their closure	YES	

Waste	Official Gazette 125/15, 90/16	Ordinance on the management of end-of-life vehicles	Prescribe the procedures and objectives for waste vehicles management, the manner of their processing, requirements for collection, storage and transportation, including marking and equipping of vehicles	YES	
Waste	Official Gazette 69/16	Ordinance on construction waste and waste containing asbestos	Prescribe the purpose of the waste management system, the obligations of the producer of the construction product, the way of marking the construction product and packaging, the conditions of waste management, the obligation to keep records on the construction waste and the aim of the waste management system containing asbestos	YES	
Air emissions, wastewaters	Official Gazette 75/16	Ordinance on thermal treatment of waste	Prescribes the conditions of operation, the conditions for start and end of the incineration plant, the method of waste incineration, air, soil and water protection, and waste management and special conditions for other waste treatment processes.	YES	

Air emissions	(OG SDC 160/17) Croatia	Program for the protection of air, ozone layer, mitigation of climate change and adaptation to climate change for Split-Dalmatia County for the period 2017 to 2020.	Program sets targets and priorities for the protection of air, ozone layer and mitigation of climate change in the Split - Dalmatia County over a period of four years		NO
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## 2.2. Assessment of Market factors

### 2.2.1. Absence or Presence of Waste Types

*Do you have information on the presence of certain – reusable/recyclable – wastes which can be used as secondary raw material in the pilot area? If yes, please describe.*

Based on the analysis of material flow and companies, we collected information that in our Pilot area there is certain reusable and recyclable waste which can be used as secondary raw material. For example, in the County, fish production and processing and wine production are widespread, and therefore waste from the production can be used as secondary material. Also, production of ALU and PVC carpentry, in Cemex Hrvatska Company, dross and ash are used for secondary raw material. In Split – Dalmatia County, tourism is also widespread, and waste flows during the touristic season are increased so the waste from hotels chains can be used and it is used as secondary raw material.

*Do you have information on the absence of certain secondary raw materials that are in demand in the pilot area? If yes, please describe.*

According to the analysis there is no absence of certain secondary raw materials in our Pilot area.

### 2.2.2. Demand for Critical Raw Materials

*Is there a shortage of certain critical raw materials in your Pilot Area? If yes, please describe.*

According to the analysis there is no absence of certain secondary raw materials in our Pilot area.

### 2.2.3. Motivating Factors and Cooperation

*Please characterize your pilot area based on the factors included in Table 5 below! If feasible provide percentages for your aggregated pilot area's data.*

**Table 5: Motivating Factors and Cooperation in the Pilot Area**

	Pilot Area Aggregated Data (Please fill-in)
1. What percentage of the respondents would benefit from the following: a) Reduced waste management cost b) Income from selling waste as a secondary raw material c) Obtaining raw materials (especially limitedly available materials) at a lower cost d) Minimizing costs related to green taxes e) Receiving state allowances/refunds related to circularity/sustainability f) Marketing benefits from green operation (eco-labeling)	a) <u>90,90</u> % b) <u>36,36</u> % c) <u>9,09</u> % d) <u>9,09</u> % e) <u>36,36</u> % f) <u>9,09</u> %

<p>2. Assessment of Cooperation</p> <p>a) What percentage of the respondents would cooperate in a multi-company (industrial area wide) circular economy scheme</p> <p>b) What percentage of the respondents would be willing to sell or use a secondary raw material?</p> <p>c) What percentage of the respondents would be willing to sell or use waste heat or water?</p> <p>d) What percentage of the respondents feel that it would be feasible to find a cooperation partner(s) to work together toward closing material loops?</p>	<p>a) <u>91</u> %</p> <p>b) <u>100</u> %</p> <p>c) <u>72</u> %</p> <p>d) <u>90</u> %</p>
<p>3. What percentage of the respondents feel that questions of confidentiality and potential business secrets would make the sharing of information difficult?</p>	<p><u>54</u> %</p>

#### 2.2.4. Availability of Infrastructure

*Discuss what types of infrastructure are available in the vicinity of the pilot area that can be used for waste management. For example is there a recycling facility, or a waste sorting facility, or a re-manufacturing facility, or a facility that facilitates reuse nearby?*

Infrastructure in the Republic of Croatia and therefore in the Split – Dalmatia County is at the State level or at the County level and its availability is low. Generally, there is not enough landfills, recycling yards and sorting plants, energy recovery plants do not exist at all.

For example, in Split – Dalmatia County there is only 8 recycling yards, and according to waste management law, on 25,000 people should be one recycling yard. Split – Dalmatia County has about 460.000 inhabitants, so there should be 18 recycling yards in vicinity. Both, infrastructure and waste management system are below the required quality.

The special issue in the waste infrastructure is related to four large islands, which belong to the Split – Dalmatia County. They as well have low infrastructure availability, especially during the touristic season when the waste flow is increased. Also, certain types of waste they have to transport on the mainland because there is no available infrastructure in vicinity.

Already mentioned WMPs of municipalities prescribe the improvement and introduction of new subsystems in waste management, as well as improving infrastructure.

Improvement in infrastructure can also be achieved through the EU's incentives available in the field of waste management systems.

### 2.3. Conclusions and recommendations

*Please give relevant recommendations for your pilot area, which can help in overcoming market barriers. For instance, suggested legislative changes, the creation of waste management infrastructure, etc.*

Sustainable Waste Management Law (OG 94/13, 73/17) is the basic regulation establishing a waste

management system in the Republic of Croatia and therefor for our Pilot area.

The Law and its implementing regulations determine the obligations of various stakeholders in the waste management system; the Government of the Republic of Croatia, the Ministry of Environmental Protection and Energetics which is responsible for waste, through the implementation bodies at the state level, units of regional self-government, to waste producers and legal persons performing any of the waste management activities.

In accordance with the regulations, Split – Dalmatia County as a unit of a regional self-government unit (county) is obliged to ensure conditions and implementation of prescribed waste management measures in its area. One of the measure is to provide the locations for waste management buildings according to the category of buildings in their spatial planning documents.

So, the waste management infrastructure is result of various planning documents at county level and within county municipalities.

### 3. Assessment of availability industrial & waste management information

#### 3.1. Accessibility of waste generation /management information

Please fill out the table below based on your knowledge of your Pilot Area.

**Table 6: Availability of Waste Generation Information**

ORGANIZATION / DESCRIPTION	WHERE IS THE INFORMATION ACCESSIBLE? (Link, data request forms)	TYPE OF DATA AVAILABLE	DOES THE DATABASE ENCOURAGE WASTE EXCHANGE? YES/NO
Waste Prevention Portal	<a href="http://sprjecavanjeotpada.azo.hr/index.htm">http://sprjecavanjeotpada.azo.hr/index.htm</a>	The Waste Prevention Portal was developed within the Project for the Development of a System for the Prevention of Waste, Information and Exchange of Good Practices in Republic of Croatia.	YES
Holding Centar - Čistoća	<a href="http://sada.zgh.hr/informacije-odvajanju-otpada">http://sada.zgh.hr/informacije-odvajanju-otpada</a>	Information about waste separation and disposal (Changing habits for waste prevention),	YES
Register on the waste flow	<a href="http://eonto.azo.hr/#/Ulaz">http://eonto.azo.hr/#/Ulaz</a>	e-ONTO is a network application for keeping track of the occurrence and waste flow that enables maintenance and entry of data via web application as well as reporting form for waste stream tracking from manufacturer to end destination in a single system.	YES

#### 3.2. Recommendations for information exchange

Please give recommendations that are relevant for your pilot area, which can help in improving information exchange between waste generator, waste management companies, and companies looking to purchase waste to use as secondary raw materials.

Information exchange between waste management companies or companies looking to purchase waste to use as raw material in Republic of Croatia is very popular especially during the past few years.

Croatian Environment and Nature Agency (HAOP) has prepared Waste Prevention Portal whose purpose is to contribute to the achievement of the objectives of waste prevention by exchanging information on waste prevention projects / activities and systematic monitoring of waste prevention measures and activities. With regard to the defined purpose, this Waste Prevention Portal provides information on the possibilities, different ways, measures and activities in the area of waste prevention and waste management, which can help companies to plan their own waste prevention activities or to participate in common activities with other companies. Waste Prevention Portal covers all areas of Croatia, so also the Split- Dalmatia County which is our pilot area.

The main goal and recommendation is to encourage companies to exchange their work and positive practices regarding the waste management in order to create good communication and thus stimulate the use of waste as secondary raw material in the creation of a circular economy.

Examples of voluntary instruments of companies for improving information exchange include information - educational activities, encouraging green and sustainable public procurement, etc.

The implementation of information and education activities as tools includes leaflets, manuals, web pages, the improvement or establishment of a new portal. To encourage green and sustainable public procurement, it is envisaged to produce accompanying manuals, criteria for public procurement, and establishment of databases.

Waste management plan for the Republic of Croatia provides the promotion of reuse and reuse of waste with regulatory instruments in the form of adaptation of the existing legislative framework.

Examples are activities of the Croatian Environment and Nature Agency, various associations and individual units of local self-government and utilities.

Mostly, classical instruments and tools for implementing waste prevention measures from European practices are recommended and adapted to our specifics, in this case for the area of Split - Dalmatia County.

Monitoring of indicators of waste prevention is subject of reports on the implementation of WMP, which are produced at the local and national level, as well as other thematic publications and reports of the Croatian Environment and Nature Agency.

## 4. Assessment of limits to access mature cleanup techs

### 4.1. Mapping waste management technologies in the environment of the selected pilot area

Please provide a list of local practices or technologies which are available for reuse, recycling, or remanufacturing waste in your pilot area.

In our Pilot area there is several companies with technologies for reuse, recycling and remanufacturing waste but the technologies are not available in each of the companies. According to the analysis, there are designs and working versions of the technologies but yet all are not in use.

The technology used is the technology in company Cemex Hrvatska of using dross and ash in cement production, also in performing the activities of management and thermal processing of the fuel part of waste generated from the process of processing municipal and industrial waste.

### 4.2. Gap analysis of waste recycling /management technologies

Please fill out the table below based on your knowledge of your Pilot Area.

**Table 7: Availability of Waste Management Practices/Technologies**

WASTE FLOWS	AVAILABLE PRACTICE(S)/TECHNOLOGY(S)		GAP ANALYSIS		
	Name of the Practice/ Technology	Description of the Practice/ Technology	DOES NOT EXIST	EXISTS but LACKING CAPACITY or LOCALLY NOT AVAILABLE	EXISTS and AVAILABLE FOR USE
Plastics	Production of ALU and PVC carpentry	Most of the waste flow is recycled/reused outside the facility	X		
Critical Raw Materials (eg. metals, minerals)	Production of ALU and PVC carpentry	Waste flow is recycled/reused outside the facility	X		
Construction Waste	/	/	X		
Food Waste	Food industry - fish processing and sea fishing	Waste flow is recycled/reused outside the facility	X		
Biomass (eg. wood, paper, biofuels)	Production of ALU and PVC carpentry. Also is used in	Waste flow is recycled/reused outside the facility	X		

WASTE FLOWS	AVAILABLE PRACTICE(S)/TECHNOLOGY(S)		GAP ANALYSIS		
		food industry - fish processing and sea fishing  Biomass from hotels chains	Waste flow is sent to the landfill or recycled/reused outside the facility		
+ Other Top 3 waste flows being relevant in your Pilot Area	Production and distribution of electrical and thermal energy within the group.	Waste flow is sent to incineration	X		

### 4.3. Recommendations to improve availability of waste management technologies in the environment of the pilot area

*Please give recommendations that are relevant for your pilot area, which can improve the availability of waste management technologies - for example financial support of start-ups, etc.*

As mentioned earlier, to improve availability of waste management technologies in area of Split – Dalmatian County is important to act together. In pilot area, there is a lot of small municipalities which are unable to have good technologies or large technologies for waste management or they are too small to handle waste management issues by themselves. Regarding too that it is recommended that small producers, collectors, processors of the same type from the small municipalities work together in order to improve waste management technologies in quality way. Also the work of several smaller companies together can be very helpful in the view of obtaining financial support from EU's incentives available in the field of waste management systems.

## 5. References

*Please list your references below. For example if you used publically available information, or a published article, please list the source below.*

- [1] [http://www.haop.hr/sites/default/files/uploads/dokumenti/021\\_otpad/Projekti/OTP\\_P\\_R\\_Koncept%20za%20razmjenu%20podataka%20te%20pra%C4%87enje%20provedbe%20i%20efikasnosti%20sprje%C4%8Davanja%20nastanka%20otpada%20u%20Hrvatskoj.pdf](http://www.haop.hr/sites/default/files/uploads/dokumenti/021_otpad/Projekti/OTP_P_R_Koncept%20za%20razmjenu%20podataka%20te%20pra%C4%87enje%20provedbe%20i%20efikasnosti%20sprje%C4%8Davanja%20nastanka%20otpada%20u%20Hrvatskoj.pdf)
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