



## MANAGEMENT OF SPECIAL WASTE

Legislative Decree 152/2006 (Italian Environmental Law) requires companies to manage their waste in an organized manner according to a series of well-defined steps.

Specifically, the Decree distinguishes, based on the origin of the waste, between:

- **Urban waste**
- **Special waste**, the latter being waste produced by organizations and companies.

In turn, the “special waste” of the companies are distinguished, based on their danger, in:

- **Non-hazardous waste**
- **Hazardous waste**

Companies must therefore detect, identify and classify their waste by assigning a **EWC code (European Waste Catalogue) consisting of 6 numbers**. To attribute the code it is essential to know in depth both the production process that generated the waste and the specific characteristics of the latter. Responsibility for assigning the EWC code to the waste is the manufacturer’s responsibility.

**The EWC codes of hazardous waste are identified by an asterisk** (eg 130110 \*: mineral oils for hydraulic circuits, not chlorinated).

| EWC code  |  |
|---|--|
| <b>ABSOLUTE</b>   | <b>MIRROR</b>  |
| <p>That is without reference to the dangerous substances contained.</p> <p>The waste to which an absolute EWC code is assigned is automatically considered dangerous regardless of the substances that compose it (eg 160601 *: <i>lead batteries</i>).</p> | <p>That is with reference to dangerous substances that can be contained. In this case a more in-depth analysis of the waste is required (eg chemical analysis), to establish whether the waste is dangerous or not based on the concentration reached by the dangerous substances within the waste itself (eg 150202 *: <i>absorbent, filter materials (including oil filters not otherwise specified), rags and protective clothing contaminated with dangerous substances Vs. 150203: sanitary napkins, filter materials, rags and protective clothing, other than those mentioned in heading 150202</i>).</p> |

**Once the waste has been classified, the company must prepare a temporary deposit in the place of origin and production of the waste. The temporary deposit does not require authorization as long as the waste:**

- Are distinguished by homogeneous categories, simplifying, by EWC code
- Are correctly packaged and labeled, in relation to the dangerous substances they contain;
- Are disposed of within the time or quantitative limits chosen by the manufacturer, ie
  - on a quarterly basis, regardless of quantity;
  - upon reaching 10 m<sup>3</sup>. In this case, however, the deposit cannot exceed the duration of 1 year
- In the case of persistent organic pollutants (Pop), it is necessary to comply with the relevant technical standards for storage and packaging.

**The company must then deal with the traceability of its own waste;** in particular, hazardous waste is subject to registration on the "loading and unloading register" (which must be kept for at least 5 years from the last registration). The company must record, for each waste, the loading and unloading on the register within 10 days respectively of production or transport for recovery / disposal. The transport of hazardous waste requires the completion of the waste identification forms (with the 4 copies for the producer, the transporter, the recipient, and the last, downstream of the process, again for the producer as proof of proper management of waste).

The company must then make sure:

- that the transporter is registered in the category of reference of the environmental managers register;
- that the recipient of the waste is authorized for the storage and treatment of the waste.

Finally, **every year (April 30th) the company must write the MUD** (Environmental Declaration Model) necessary to communicate the waste produced and disposed of in the previous year to the waste register (with some exceptions based on the dangerousness of the waste and the type of company).