

Zagreb, 20.11.2009.



**Green Action comments on  
Environmental Impact Assessment  
for the Kastijun Regional Waste Management Centre, Istria**

Green Action has already contributed in detail to the national level Environmental Impact Assessment process for the planned Kastijun Regional Waste Management Centre, Istria,<sup>1</sup> and welcomes the opportunity to provide additional comments to the EBRD.

**Our main concern is that the project will not provide high quality results in terms of the level of recycling achieved. This is due to 3 issues:**

**1) Ways to minimise waste production and implement an efficient source-separated recycling system were not analysed before the project was prepared.**

Istria's waste management plan was adopted almost a year after this EIA was approved, and had fixed several important parameters such as waste quantities, MBT technologies to be used, timelines, and financing. Our suggestions that the EIA should analyse at least some front-of-pipe waste management alternatives were dismissed as being outside the scope of the study. One project has therefore been allowed to dictate the waste management policy of the county rather than a proper analysis being done.

*We therefore recommend that further analysis is carried out to examine various waste quantity scenarios resulting from waste minimisation and source separation programmes.*

**2) If we nevertheless accept the figures given for the waste needing to be treated, the most effective alternatives have not been analysed at all.**

The EIA did not examine any MBT technologies including anaerobic digestion, which would bring the highest recycling and composting levels. The response from the EIA Commission sent on 3<sup>rd</sup> July 2008 states that anaerobic digestion would require the construction of high structures which in this case due to spatial planning constraints would have to be partially dug into the ground, otherwise they would have an unacceptable visual impact. **It therefore appears that the technology has been chosen to suit the site, not to bring the best waste management results.**

*We therefore recommend that technologies incorporating anaerobic digestion are examined, along with the feasibility of partially digging in such a facility. If such technology is found to be effective but not suitable for this site, a different site should be found.*

**3) We are further concerned about a possible lack of competition** in the forthcoming tender procedure for the facility. As far as we are aware the technology outlined in the EIA is standard technology only for EcoDeco, although a few other manufacturers are able to supply the technology. We are therefore concerned about the tender procedure possibly favouring of one manufacturer, EcoDeco.

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<sup>1</sup> Our original comments can be found here in Croatian:  
<http://www.zelena-akcija.hr/content/view/737/406/lang,hr/>