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To all
clients

Circular No. 9/2026

Bolzano, 15 January 2026

Subject: RENTRI – registration obligation and digitalisation by 13 February 2026

We have already informed you in the past about RENTRI, the national electronic register for the traceability of waste. Below are the deadlines for initial registration once again, which depend on the size of the business:

- **from 15 December 2024 to 13 February 2025: first group of obliged parties (in particular businesses with more than 50 employees),**
- **from 15 June 2025 to 14 August 2025: second group of obliged parties (businesses with 10 to 50 employees), and**
- **from 15 December 2025 to 13 February 2026: final group of obliged parties (businesses with up to 10 employees).**

There is, however, no obligation to register with RENTRI for businesses with up to 10 employees which are initial producers of exclusively non-hazardous waste.

In addition, from 13 February 2026 the waste identification form (FIR) must be produced in fully digital form. This means:



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- The waste identification form is an electronic document and no longer a paper form with a handwritten signature.
- The digital FIR is created, transmitted and retained via the services provided by RENTRI or via integrated IT systems meeting the technical requirements.
- The digital FIR is signed by means of qualified electronic signatures or approved digital authentication procedures. This requires internal processes, responsibilities and technical equipment to be adapted.
- During the transitional phase (13.02.2025–12.02.2026) the new FIR model and digital stamping already applied, but operational handling remained largely paper-based. From 13 February 2026, fully digital handling of the FIR applies to parties registered with RENTRI.

The obligation to use the digital FIR from 13.02.2026 concerns exclusively those parties required to keep the FIR and registered with RENTRI. The specific scope therefore depends on the role of the party concerned (producer, transporter, intermediary, plant operator).

Managing the digital waste transport document (FIR)

The digital waste transport document (FIR) is updated by the operators involved in the transport via their own management software, to ensure that it is progressively completed and signed at the various stages of transport. The digital waste transport document must be signed digitally by the producer and the transporter before the transport begins, and by the recipient when the waste is taken over. It must also be signed digitally by all other parties involved in the transport (e.g. in the event of transshipment).

The recipient transmits the complete FIR, signed by all parties, to the producer via RENTRI. In order to facilitate roadside checks during transport, the waste is accompanied by a paper printout of the digital form, in accordance with the template in Annex II to Ministerial Decree no. 59 of 4 April 2023. Alternatively, it is possible to present the digital form during transport using mobile devices.

If you are affected by these changes, we recommend that you contact the Chamber of Commerce (regarding registration) and your software provider (regarding digital management) without delay.

We remain at your disposal for any further information.

Yours sincerely

Josef Vieider