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To all
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Circular

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Subject: new RENTRI waste-tracking system – new obligations as of 13 February 2025

By 13 February 2025, all "operators" in the field of waste management, as well as all producers of hazardous and non-hazardous waste with more than 50 employees, are required to register in the RENTRI register. Smaller businesses have somewhat more time, as set out below. However, all undertakings are already required, as of the aforementioned date, to use the new digitally validated waste transport forms and also the new registers. The Bolzano Chamber of Commerce has published extensive instructions on its website regarding the registration obligation, the new waste transport forms and also the new keeping of registers. Here is the link:
<https://www.camcom.bz.it/de/dienstleistungen/umweltschutz/rentri/eintragung-ins-rentri>

Below is the most important information.

RENTRI stands for "Registro Nazionale Tracciabilità Rifiuti" and replaces the SISTRI register, which was discussed for years but never actually activated, and comprises a comprehensive digital system for the traceability of waste. It serves to map digitally the provisions of the

statutory environmental accounting for businesses that produce and/or further process waste. Specifically, via the register

- the issuing of waste transport forms,
- the keeping of incoming and outgoing registers for waste and
- the annual waste declaration MUD

are newly regulated.

In addition, the introduction of the register in South Tyrol also has implications for the obligation to register in the register of environmental operators (Verzeichnis der Umweltfachbetriebe). The exemptions that allowed members of trade associations to transport their waste without being registered in the register of environmental operators will no longer be applicable as of February 2025.

The implementing provisions required for the register were issued by Decrees No. 253, 254 and 255 of 12 December 2024.

1. Registration:

It should be noted at the outset that a staggered transitional arrangement applies to registration in the register.

Who is required to register?

- a) organisations and undertakings that process waste;
- b) producers of hazardous waste;
- c) organisations and undertakings that collect or transport hazardous waste on a professional basis or act as dealers in and brokers of hazardous waste;
- d) consortia established for the reprocessing and recycling of certain types of waste.

Deadlines for registration:

The rules provide for the following timetable for registration in the new register:

- a) from 15 December 2024 to 13 February 2025 those carrying out waste management activities (so-called "operators") and producers of hazardous and non-hazardous waste with more than 50 employees;
- b) from 15 June 2025 to 14 August 2025 producers of hazardous and non-hazardous waste with more than ten employees;
- c) from 15 December 2025 to 13 February 2026 all other producers of hazardous waste.

The number of employees is calculated on the basis of the persons working for the undertaking or the entity in a relationship of subordination under an employment contract and

receiving remuneration. The number refers to the total employees of the undertaking or the entity as at 31 December of the previous year.

The registration procedure:

The portal <https://www.rentri.gov.it> offers four access areas through which the various parties can register and manage their obligations and interests vis-à-vis

RENTRI: <https://www.rentri.gov.it>

- **Operators (access for commercial operators and waste producers)** gewerbliche Betreiber Abfallerzeuger
- **Waste producers not registered in RENTRI: for the issuing of the waste transport form (FIR) in paper form**
- Bevollmächtigte Authorised representatives
- Supervisory authorities

Below are the registration steps as presented by the Bolzano Chamber of Commerce:

1. Access to the Operators user area via the portal <https://www.rentri.gov.it>, using the following digital authentication instruments issued in the name of the operator's representative: <https://www.rentri.gov.it>
 - a. **SPID for natural or legal persons,**
 - b. National Services Card (CNS),
 - c. Electronic Identity Card (CIE).
2. RENTRI verifies the title of representation by means of interoperability
 - a. with the Business Register for the purpose of identifying the undertaking and the user's power of representation,
 - b. with the Index of digital domiciles of public administrations and operators of public services (hereinafter referred to as the PA Index) for the purpose of identifying the entity, which can confirm the user's power of representation on the basis of a PEC message sent by the platform,
 - c. with the tax database (tax register) and INI PEC for the purpose of validating the identity of persons holding a VAT number or tax number who can confirm the user's power of representation on the basis of a PEC message sent by the platform.
3. Creation of the operator profile by importing the data from the Business Register, from the PA Index or from other official databases and adding further registry data.

4. Entry of the natural persons who, in their capacity as internal or external agents of the operator, are authorised to use the services of the RENTRI portal on behalf of the operator. Beauftragte des Betreibers
5. Entry of the operating sites at which the operator carries out its activity and, where required to do so, keeps one or more incoming and outgoing registers. Betriebsstätten
6. Entry of the activities carried out at the operating sites (production, recovery, disposal, transport, brokerage and trading without possession of the waste).
7. Entry of any authorisations granted to the persons referred to in Art. 18 of Ministerial Decree No. 59 of 4 April 2023 (applies only to waste producers). in Art. 18 des Ministerialdekrets Nr. 59 vom 4. April 2023 genannten Subjekte
8. Entry of the data of permits (only for persons subject to the obligation).
9. Payment via the platform for payments to the public administration (PagoPA) of the prescribed secretarial and annual fees for each operating site. Sekretariats- und Jahresgebühren
10. Submission of the application for registration to RENTRI, for which no digital signature is required.

The application for registration in RENTRI may be completed in several stages, as the data entered are saved and retained.

Additional operating sites may also be entered after registration.

2. The waste transport form (FIR)

Irrespective of registration, all undertakings are required as of 13 February 2025 to validate the new waste transport forms digitally. As of the aforementioned date, it is no longer possible to use the "old models" pursuant to Ministerial Decree 145/1998, even if these have already been validated.

The waste transport form (FIR), which accompanies the transport of waste, is issued by the producer or holder of the waste and is completed and signed, each for the part for which they are responsible, by the parties involved in the various stages of transport.

Without prejudice to the responsibility of the producer or holder for the information falling within its area of responsibility, the waste transport form may be issued and completed by the carrier at the request of the producer or holder.

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From 13 February 2025 to 13 February 2026: issuing of the new FIR models in paper form

All producers issue the FIR using the new models in paper form. The use of the new models is mandatory also for persons not registered in RENTRI. Before issuing the first FIR, these persons must register on the RENTRI portal in the "Waste producers not registered" user area. The waste transport form (FIR) must be validated digitally via RENTRI.

The FIR may be issued and completed by the carrier at the request of the producer or holder.

As of 13 February 2026: issuing of the new FIR models in digital form

As of 13 February 2026, operators registered in RENTRI must manage the FIR for all waste in digital form and transmit the data of the waste transport forms concerning hazardous waste to RENTRI.

Please note: operators not registered in RENTRI continue to manage the FIR in paper format using the "new models".

The waste transport form (FIR) may already be managed voluntarily in digital form before 13 February 2026. The date from which this will be possible will be announced by means of a corresponding notice on the RENTRI portal.

3. The waste register

With the introduction of RENTRI, the rules for managing the incoming and outgoing registers are changing. By contrast, the provisions of Article 190 of Law Decree 152/2006 remain unchanged as regards the persons required (and exempted) to keep registers, the possibility for certain operators to keep the register in an alternative manner, the deadlines for recording movements and for retaining the register, as well as the possibility for professional associations to keep the register on behalf of their members.

The transition to digital validation and keeping of the chronological incoming and outgoing register for persons required to register in RENTRI will take place gradually.

As of 13 February 2025, commercial operators and large producers of hazardous and non-hazardous waste with more than 50 employees are required to keep the register in digital form. For all other producers required to register in RENTRI, the obligation to keep the register in digital form begins upon registration in RENTRI.

As of 13 February 2025 and until registration in RENTRI, waste producers keep the register in paper form using the new model, which can be downloaded from the RENTRI portal and must be validated by the Chamber of Commerce. Consequently: even those who are required to register in the RENTRI register only at the later deadlines may no longer use the old waste registers as of 13 February 2025 and must switch to the new ones. Validation continues to take place through the Chamber of Commerce.

Please note: please check without delay whether your undertaking is required to register in RENTRI and to keep the electronic incoming and outgoing registers. Registration requires digital authentication by means of SPID, CIE (digital identity card) or CNS (national services card). Our office will be pleased to assist you with the registration.

Yours sincerely

Josef Vieider