UNIRIMA REPORT 2025

PRODUCTION OF RAW MATERIAL - END OF WASTE FROM SEPARATE COLLECTION OF PAPER AND CARDBOARD

UNIRIMA
UNIONE NAZIONALE IMPRESE RACCOLTA, RECUPERO RICICLO E COMMERCIO DEI MACERI E ALTRI MATERIALI

UNIRIMA REPORT 2025

PRODUCTION OF RAW MATERIAL - END OF WASTE FROM SEPARATE COLLECTION OF PAPER AND CARDBOARD

PRODUCED BY

UNIRIMA

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ZANUTTA

LETTER FROM THE PRESIDENT

Our sector has always been a privileged observatory of what Circular Economy means: transforming waste into resources, regenerating value where others see limitations. It is an ancient story, rooted in medieval rag-and-bone men, which is being renewed today in thousands of Italian companies that collect, process and recycle waste paper every day.

The 2025 Report takes a snapshot of a sector that remains among the European leaders in terms of industrial capacity and environmental performance, but which faces new challenges: geopolitical complexity, market volatility, regulatory pressure and bureaucratic costs that continue to divert resources away from investment and innovation.

Nevertheless, the strength of our system is clear: a widespread, polycentric model that combines small and medium-sized enterprises with a great common goal. It is not an industry imposed from above, but a vital fabric that has grown from the bottom up and has been contributing to the country's prosperity for centuries.

In times when sustainability risks to become a slogan, our sector demonstrates that it is possible to give concrete shape to the idea of circularity: giving back to society more than we take. But for this model to continue to generate value, it needs to be recognised as part of the country's strategic infrastructure.

With this report, we would like to offer not only a picture of the numbers, but above all a perspective: to consolidate Italy as an advanced laboratory for the European circular economy. To do so, a new pact is needed between institutions, businesses and citizens, based on simplification, trust and vision.

This is the direction that we, as UNIRIMA, are committed to pursuing and which we present in the following pages.

GIULIANO A. TARALLO
THE PRESIDENT OF UNIRIMA

INTRODUCTION

As every year, the main purpose of the UNIRIMA Report is to provide an exhaustive overview of trends of the sector of collection, recovery, recycling and trade of paper from recycling, presenting data, infographics, insights into economic aspects and an overview of the international scenario updated to September 2025.

Chapter 1 provides a snapshot of the Italian industry of paper from recycling, which continues to be a sector of excellence in the circular economy, presenting production and market figures, the plant situation throughout the country and recycling data.

The following chapter 2 analyses the sector's key international data and import and export trends, with a focus on some of the main reference countries.

The third chapter is dedicated to companies' main challenges, with reference to some recent regulatory changes and an analysis of the framework factors that mainly impact the sector.

Chapter 4 summarises the data emerged from the survey conducted by the UNIRIMA Centro Studi, the Association's study centre, this year focused on the impact that administrative and bureaucratic fulfilments have on companies in the sector.

The fifth and final chapter aims to provide an overview of future scenarios for the industry of paper from recycling.

1. THE FIGURES FOR THE ITALIAN PAPER FROM RECYCLING INDUSTRY

The Italian paper supply chain is one of the most virtuous in the national context and has historically been one of the pillars of the circular economy: paper waste is collected and sent to mechanical recycling plants for the production of raw materials - End of Waste - which are then used to manufacture new products.

The supply chain can be divided into four segments:

1. Paper and cardboard waste collection activities (waste management companies);
2. Paper waste treatment activities for the **production** of the **end-of-waste raw material ''paper from recycling''** (mechanical recycling plants);
3. Production of paper reels (paper mills);
4. Processing activities (printing/graphic and paper converting companies).

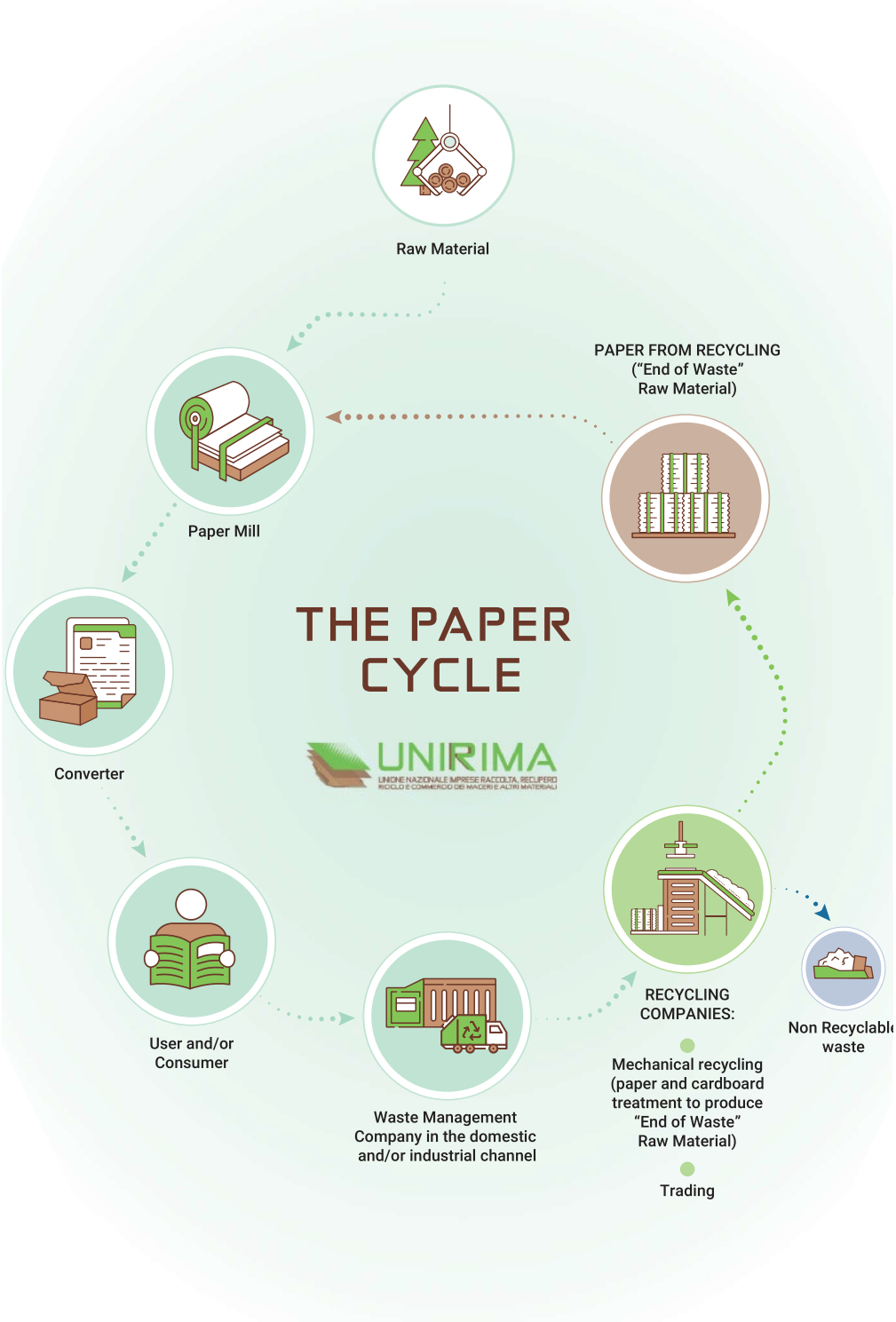


FIGURE 1: THE STRUCTURE AND FUNCTIONING OF THE ITALIAN PAPER SUPPLY CHAIN

Waste management companies that operate municipal paper waste collection activities can be either public or private [1], while those that manage collection from the industrial and commercial sectors are mainly private. After collection, paper and cardboard waste is sent to treatment plants for the production of paper from recycling.

1 - The scenario includes both mono-utilities, which focus exclusively on municipal waste management, and multi-utilities that integrate services such as energy, water and transport.

1.1 Paper from recycling plants

Paper and cardboard waste, coming from both municipal separate collection and from productive activities, is sent to **treatment plants (mechanical recycling phase)** managed by **companies of paper from recycling**. This sector consists of small and medium-sized family-run companies, which manage a well-established network of plants with an authorised treatment capacity exceeding the quantities of paper and cardboard collected.

Most of this paper and cardboard waste is sent to approximately **700 recovery plants spread throughout the country**, but the overall number of plants authorised to receive paper and cardboard waste is 1,591 [2].

In these plants, paper waste undergoes processing operations aimed at producing **secondary raw material - End of Waste** (hereinafter, also MPS EoW), pursuant to the **Ministerial Decree 188/2020**, to be sent to paper mills or other industries that can use it as raw material.

There are 346 [3] plants that also receive paper and cardboard waste from municipal separate collection, with an average distance of only 16.7 km from the collection basins, **confirming the capillarity of the paper waste treatment plant network and showing no shortage of facilities**.

The ratio between the number of inhabitants and the number of plants remains very similar from year to year across the different geographical areas of the country. This "widespread" distribution of plants throughout the national territory, together with their proximity to waste production sites and their flexibility, **make this sector a fundamental pil-**

2 -Source: National Register of Waste Authorisations and Notifications (updated 13/11/2024).
3 -Source: Comieco,30th Annual Report. Paper and Cardboard collection, recycling and recovery. Data 2024, Milan, 2025.

lar of the Italian green industry and are among the factors that enabled Italy to already achieve the EU target for recycling cellulosic packaging by 2025 in 2009 and to significantly exceed the target set for 2030 in 2023.

FIGURE 2: PRODUCTION OF PAPER FROM RECYCLING (END-OF-WASTE RAW MATERIAL, COMPLIANT WITH THE MINISTERIAL DECREE 188/2020)

The Italian paper mills that produce reels using paper from recycling numbers 56 [4]. These are mostly medium to large-sized companies, largely located in the North of Italy. In the South there are 7 paper mills in total, while there are no paper mills in six regions.

At the European level, given a macroeconomic scenario characterised by significant criticalities (inflation, weak economic growth, geopolitical tensions) the number of paper mills has decreased in the period 2023-2024 (-1,8%). This phenomenon has been a feature of the sector for over a decade (2010-2024) and has seen a 16.5% reduction in the number of paper mills and the concentration of production in large groups, often controlled by multinational corporations. It is worth highlighting the conversion process undertaken by numerous paper mills, which have reoriented their production from graphic paper to cellulosic packaging.

There are approximately 3,050 **paper converting companies** (processors) that process paper and cardboard to make finished products: most of these are small to medium-sized businesses, typically family-run (source: Assografici).

1.2 DATA [5]

In **2024, Italian production of paper from recycling stood at 6.83 million tonnes**, with a slight decrease (-0.78%) compared to the previous year.

Paper from recycling exports in 2024 stood at **1.9 million tonnes**, down 10.6% compared to 2023, as a result of the effects of geopolitical tensions on international shipping and a common trend among the main exporting countries. However, this figure is still above the average amount exported since 2007 [6].

On the other hand, domestic consumption of paper from recycling rose, reaching 5.2 million tonnes used by Italian paper mills, marking a 3.8% increase compared to 2023 [7].

Imports of paper from recycling by Italian paper mills showed an increase of 6.9% compared to the previous year, rising from 270,230 to **288,799 tonnes** [8].

Note n. 4
Comieco, 30th Annual Report. Paper and Cardboard collection, recycling and recovery. Data 2024, Milan, 2025.

Note n. 5
Please note that any revisions and updates to the data reported in previous editions of the UNIRIMA Report are due to the replacement of estimated data with actual data.

Note n. 6
The average quantity of exported paper from recycling from 2007 to 2023 is 1.7 million tonnes.

Note n. 7
Consumption data collected by ISTAT from paper mills.

Note n. 8
The production of paper (reels) by Italian paper mills is also on the rise, increasing from 7.5 million tonnes in 2023 to just under 7.96 million tonnes (+6.2%) in 2024. The production of packaging grew (+5.7%) and remained the main component of production, accounting for 59% of total paper production.

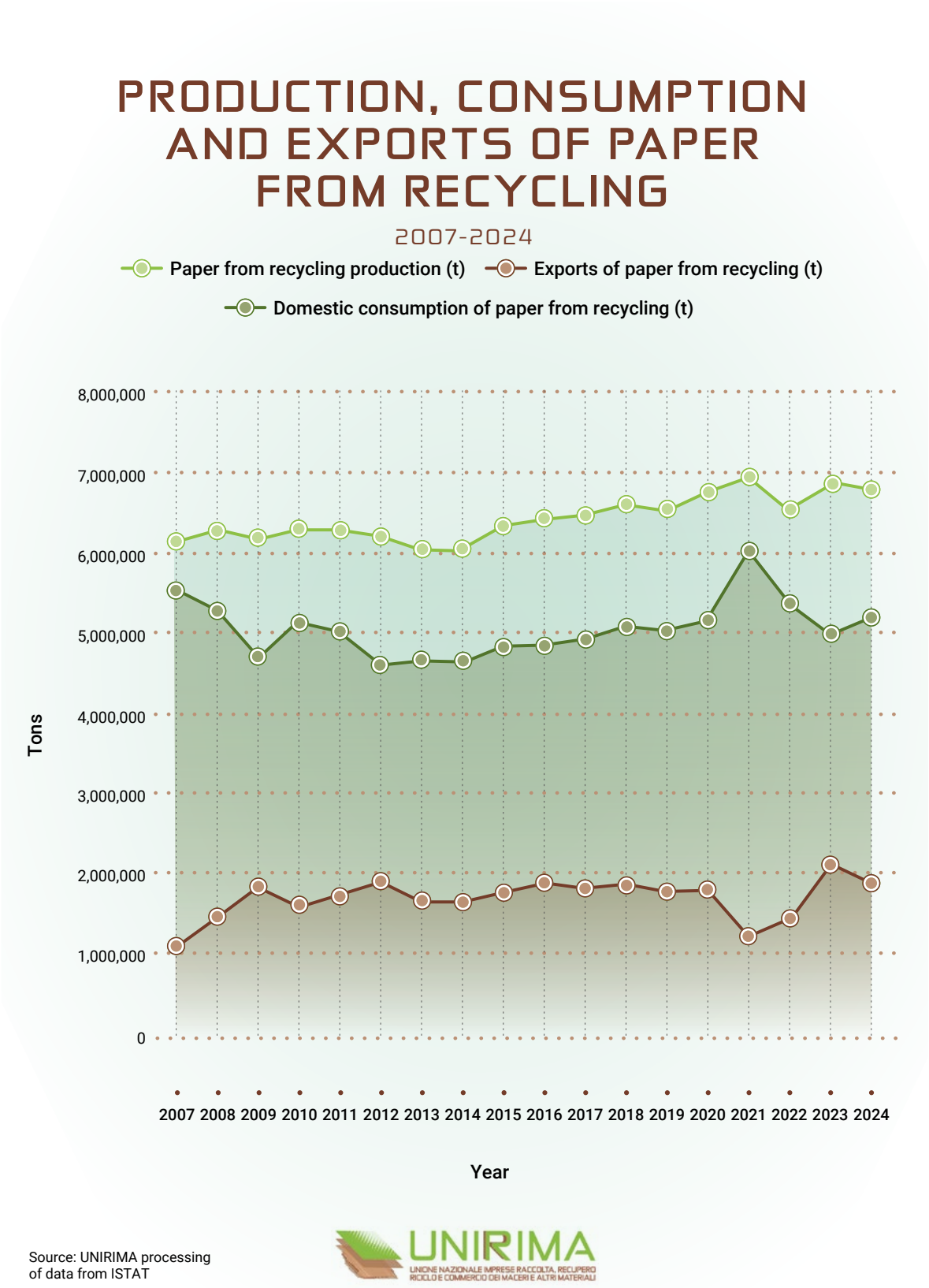


FIGURE 3: PRODUCTION, CONSUMPTION AND EXPORTS OF PAPER FROM RECYCLING, 2007-2024, ITALY

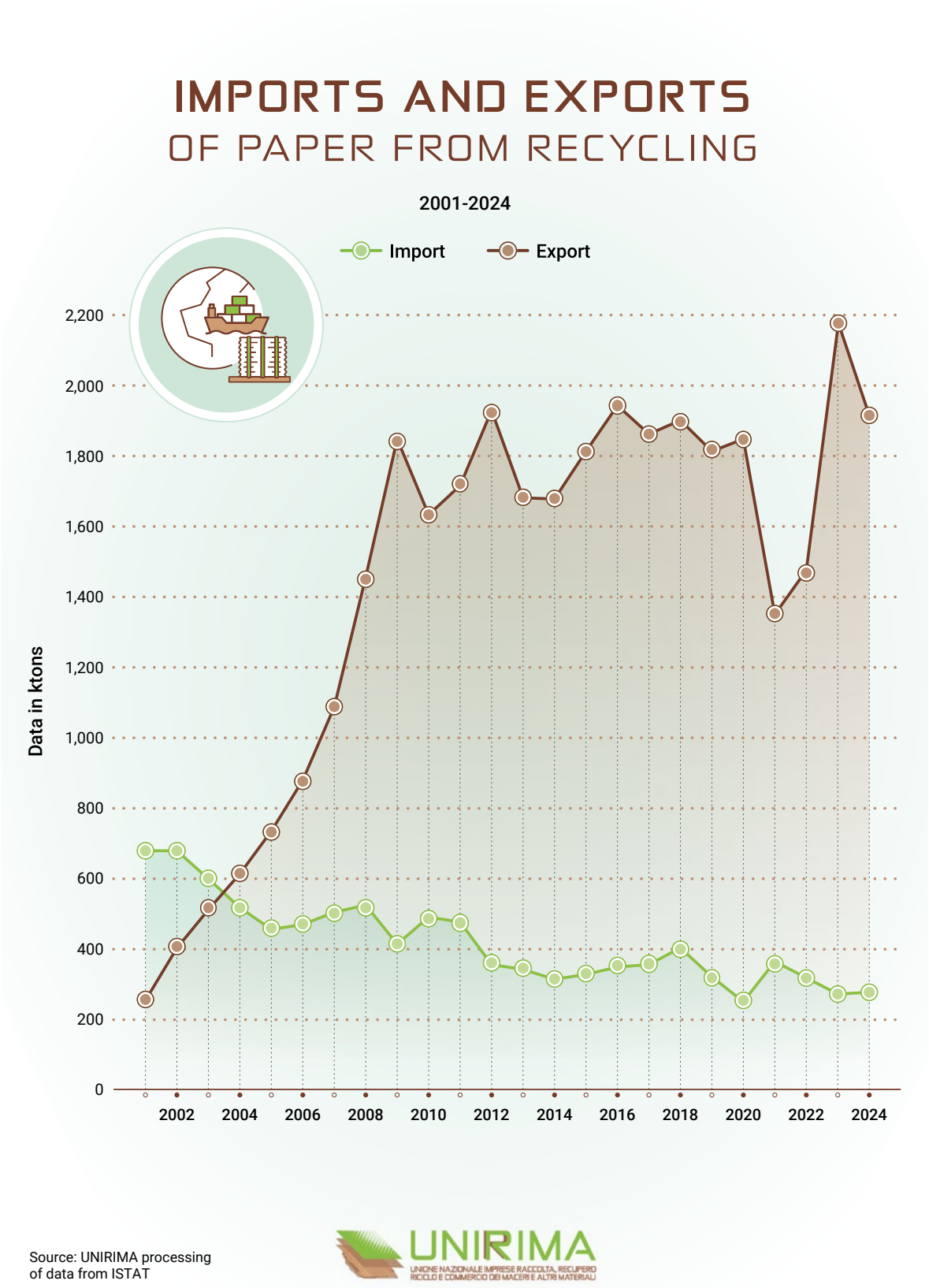


FIGURE 4: IMPORTS AND EXPORTS OF PAPER FROM RECYCLING, 2001 -2024, ITALY

The overall paper recycling rate stood at 85.8% in 2024 [9]. The decline compared to 2023 (91.8%) is a consequence of the increase in paper production for consumption (+6.2% compared to the previous year) and the simultaneous decline in in paper from recycling production. **In 2024, the recycling rate of cellulosic packaging reached 92.52%**, a slight increase compared to the previous year (92.33%) and well above **the targets set at European level for 2025** (75%) [10] and **2030** (85%), as shown in figure 5.

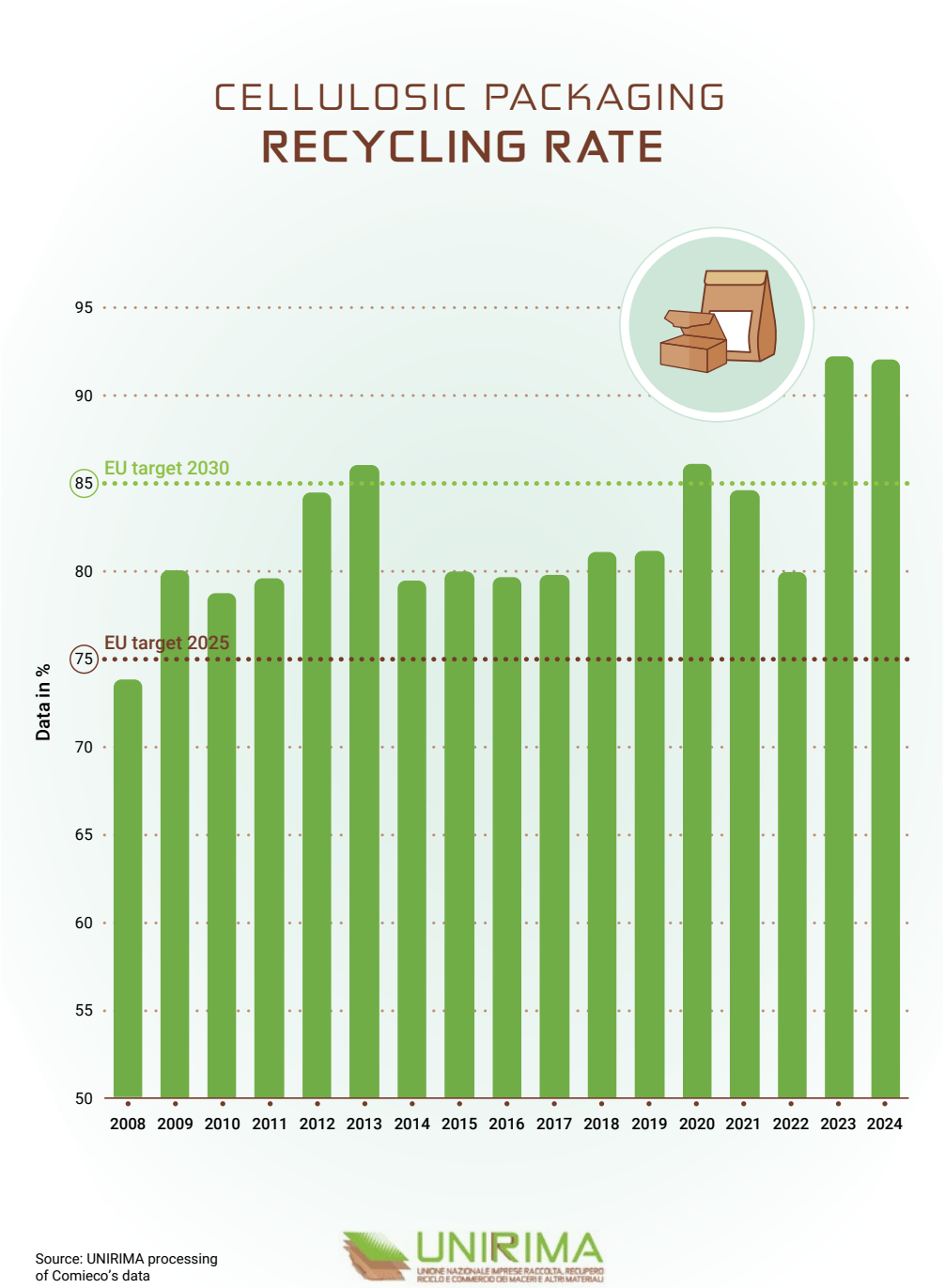


FIGURE 5: CELLULOSIC PACKAGING RECYCLING RATE (%), 2008-2024, ITALY

9 - In accordance with Italian and European regulatory provisions, the calculation point for the recycling targets is located at the output of the paper and cardboard waste treatment plants where, following the measures envisaged by the Ministerial Decree 188/2020, cellulosic waste ceases to be such to become an End of Waste Raw material "paper from recycling".
10 - A value that has been reached and exceeded in Italy since 2009.

Over the last five years, the average recycling rate for cellulosic packaging has been 87.2%, exceeding the EU's target of 85% for 2030.

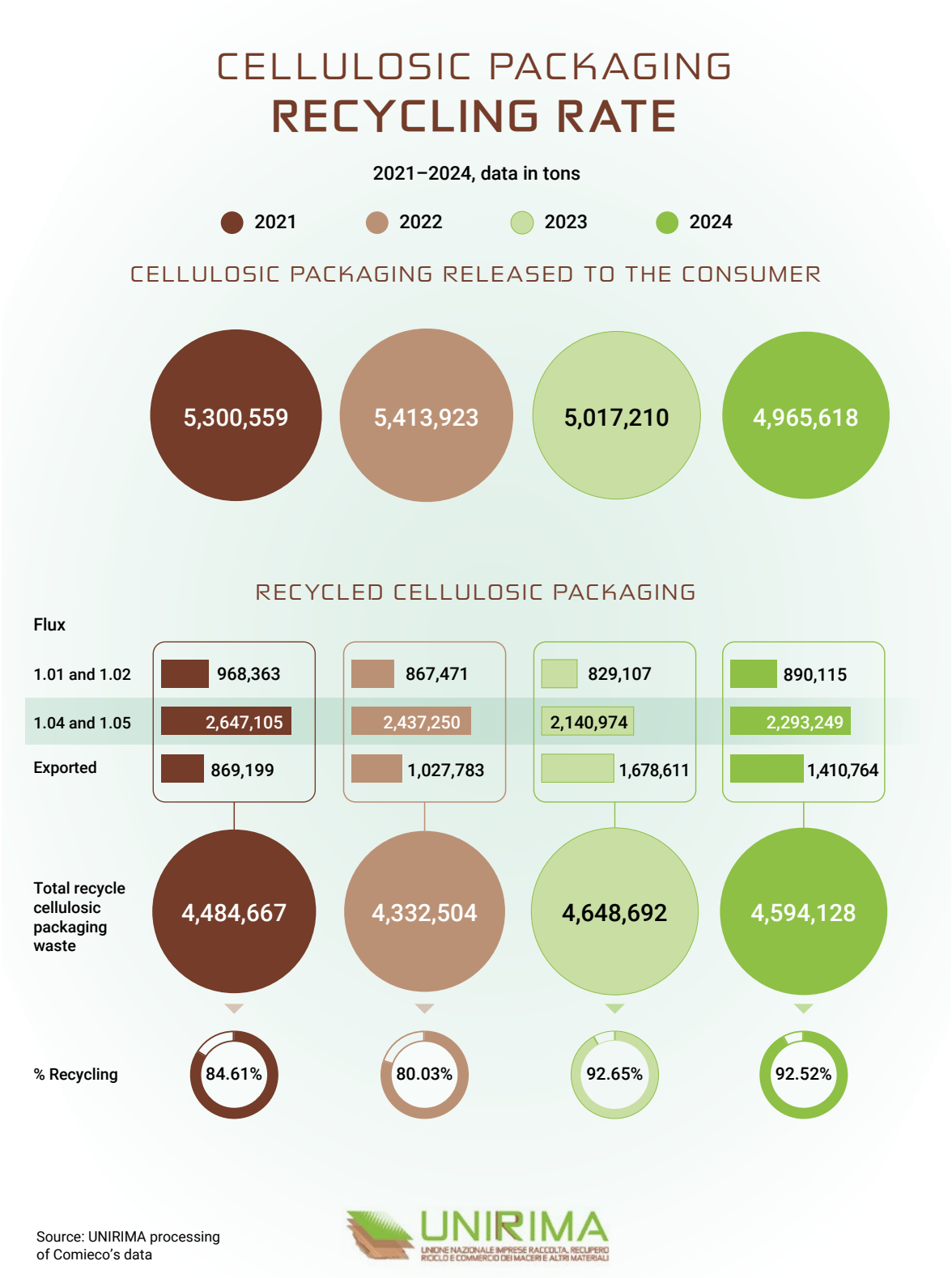
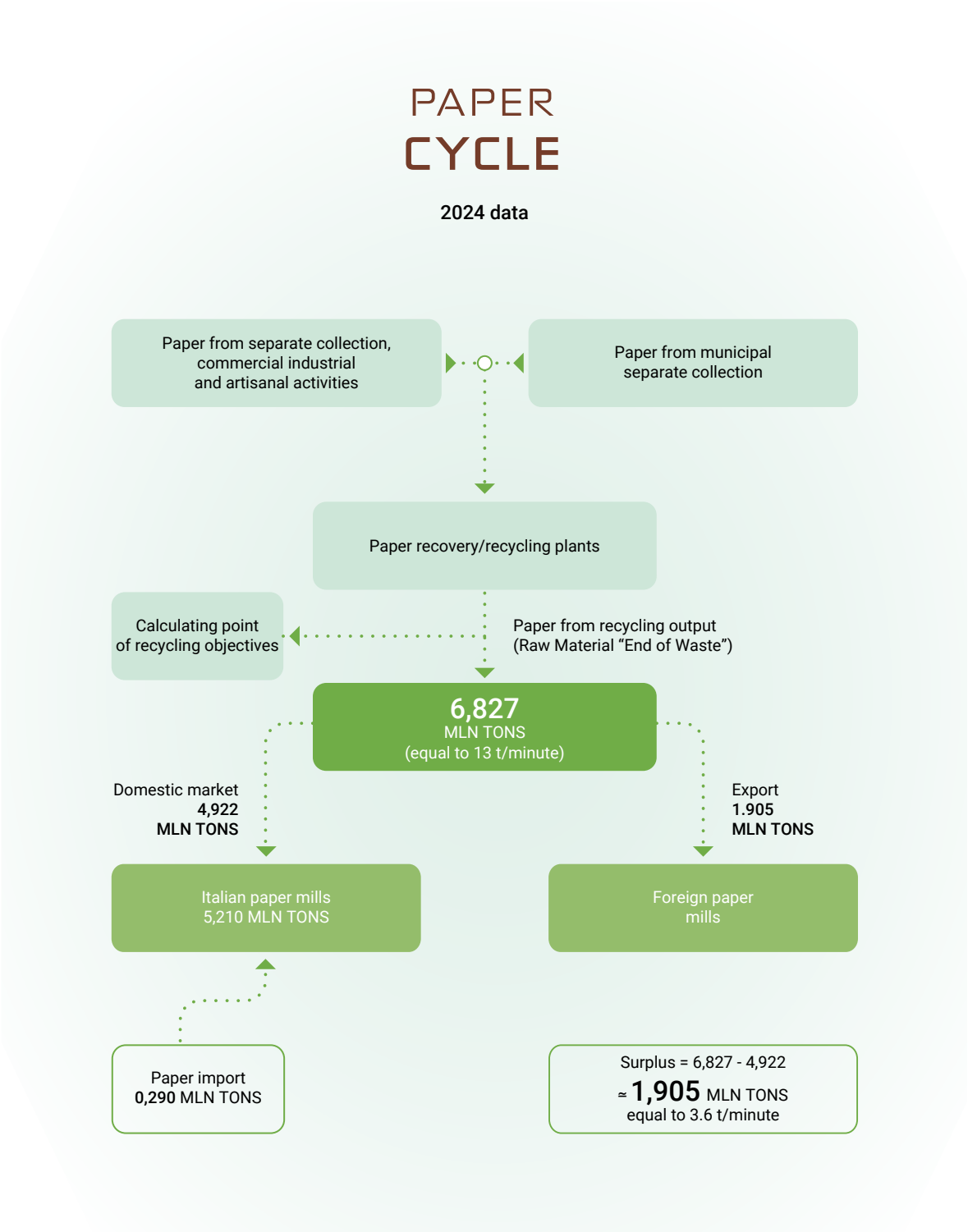


FIGURE 6: CELLULOSIC PACKAGING RECYCLING RATE IN ITALY 2021 - 2024



Source: Various sources processed by UNIRIMA

FIGURE 7: SUMMARY DATA ON THE PAPER INDUSTRY IN 2024

Figure 8, which shows the **recycling rates of various countries, including non-EU countries, highlights that Italy's rate is well above the European average of 75.1%.**

Countries	Cellulosic Packaging Recycling Rate (%) 2022	2023	2024
France	72,6%	68,0%	68,0%
Germany	99,8%	95,4%	95,6%
Italy	**80,0%**	**92,3%**	**92,5%**
Spain	80,9%	83,4%	83,6%
EU	**71,1%**	**79,3%**	**75,1%**
United Kingdom	67,0%	71,0%	64,0%
USA	93,6%	76,0%	76,0%
China	53,1%	51,2%	52,0%

FIGURE 8: CELLULOSIC PACKAGING RECYCLING RATE 2022, 2023 AND 2024 (MAIN EU AND NON-EU COUNTRIES)
Source: UNIRIMA processing of various sources [11]

11 - Sources: Carton Ondulé de France for French data, ASPAPEL for Spanish data, CEPI for EU data, CPI for UK and EU average data, and Comieco for Italian data. Rates for Germany, the US and China have been estimated by UNIRIMA according to various sources.

In 2024, the municipal separate collection (RD, abbreviation for "Raccolta Differenziata") of paper and cardboard waste reached **3.8 million tonnes** (+3.5% compared to the previous year), corresponding to a per capita collection of 65.4 kilograms per inhabitant (figure 9).
For this product fraction, which accounts for about **19% of the total RD** (and is therefore the largest fraction after organic waste[12]) a further increase is expected in 2025, to approximately 3.9 million tonnes.

	Municipal Separate Collection of Paper and Cardboard					
	Total SC (t/year)	Per-capita (Kg/inhab*year)	Run by Comieco (t/year)	Run by Comieco on SD total	SCF (Similar Commodities Fractions)	Packaging
2015	3.149.900	51,9	1.458.003	46,3%	473.510	984.493
2016	3.218.900	53,1	1.499.002	46,6%	469.490	1.029.512
2017	3.276.900	54,2	1.480.555	45,2%	437.445	1.043.110
2018	3.418.400	56,6	1.441.792	42,2%	447.141	994.651
2019	3.523.700	58,5	2.038.423	57,8%	767.088	1.271.335
2020	3.508.540	59,2	2.432.191	69,6%	982.210	1.449.981
2021	3.613.000	61,3	2.515.875	69,8%	950.309	1.565.566
2022	3.646.352	61,8	1.996.912	54,8%	689.567	1.307.345
2023	3.727.249	63,5	2.349.796	63,0%	832.793	1.517.003
2024	3.858.147	65,4	2.460.225	63,8%	873.298	1.586.927
2025 estimation	3.898.769	66,4	2.534.200	65,0%		

FIGURE 9: DATA ON MUNICIPAL SEPARATE COLLECTION OF PAPER AND CARDBOARD AND COMIECO MANAGEMENT, 2018-2024 AND FORECAST FOR 2025 [13]
Source: UNIRIMA elaborations of Ispra's and Comieco's data

Paper and cardboard waste managed under Comieco's agreement in 2024 amounted to almost 2.5 million tonnes, representing about 63.8% of the total RD, with an increase of almost 4.7% compared to 2023 [14]. The Consortium estimates that 2025 will see a decline in the quantities handled of just over 2.5 million tonnes.

12 - Ispra, Urban Waste Report, Rome.
13 - The 2023 data have been revised with respect to the previous Report, following updates reported by Comieco.
14 - Comieco, 30th Annual Report. Collection, recycling and recovery of paper and cardboard. Data 2024, Milan, 2025.

1.3 PAPER FROM RECYCLING MARKET

In recent years, the market of paper from recycling has experienced a period of extraordinary volatility, characterised by significant fluctuations caused by multiple structural and economic factors. Among the main disruptive elements since 2017 are the effect of China's import ban, the Covid-19 pandemic, the energy crisis linked to the conflict in Ukraine, and recent international geopolitical developments. In addition to political issues, there has been a further element of structural transformation affecting the European paper industry, namely the shift from graphic paper production to cellulosic packaging production, an evolution driven by the gradual replacement of plastic packaging, the expansion of e-commerce and the spread of delivery services.

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1.3.1 PRICES TRENDS FOR PAPER FROM RECYCLING [15]

The trend in paper from recycling prices in recent years, based on the prices of the Milan Monza Brianza Lodi Chamber of Commerce (hereinafter also referred to as CCIAA), shows a pattern characterised by several distinct phases:

- **crisis phase (August 2017 - February 2020)**: a sharp drop in prices following the closure of the Chinese market - which absorbed most of the paper from recycling exports - resulting from the trade war between the United States and China, which began with the introduction of tariffs by the former;
- **growth phase (March 2020 - July 2022)**: significant increase from the early months of 2020 due to the contraction in separate waste collection during lockdowns and the simultaneous increase in demand for paper from recycling driven by the sharp increase in e-commerce and delivery. The upward trend continued until it reached, between June and July 2022, the highest historical values recorded by the CCIAA quotations: € 130/ton for quality 1.02.00 and € 135/ton for quality 1.04.02 [16];
- **contraction phase (August 2022 - January 2023)**: the trend reversed sharply in August 2022 as a result of the slowdown and shutdown of Italian paper mills caused by soaring energy costs. The negative trend reached its lowest point in January 2023, with values of € 22/ton for quality 1.02.00 and € 25/ton for quality 1.04.02.
- **Instability phase (January 2023 - September 2025)**: prices fluctuated, with peaks recorded in May-June 2024 (€ 75/ton for grade 1.02.00 and € 90/ton for grade 1.04.02) and April 2025 (€ 105/ton for quality 1.02.00 and € 115/ton for quality 1.04.02), before settling at their lowest levels in September 2025.

15 - 16: notes on page 23

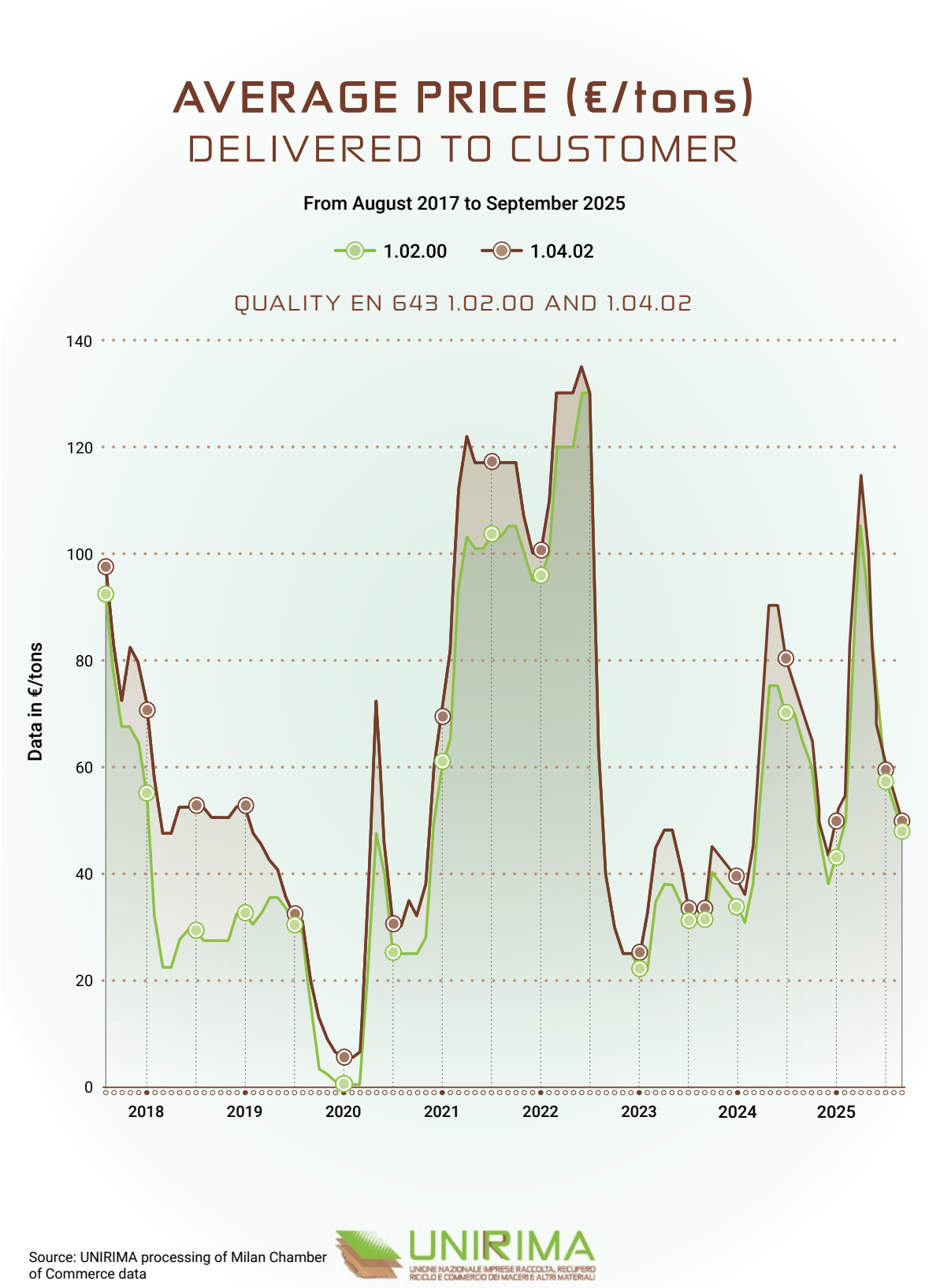


FIGURE 10: AVERAGE PRICE DELIVERED TO CUSTOMER (€/TONS) FOR CARDBOARD QUALITY UNI EN 643 1.02.00 AND 1.04.02 FROM AUGUST 2017 TO SEPTEMBER 2025

1.3.1.1 FOCUS ON PAPER FROM RECYCLING PRICES SEPTEMBER 2024 – SEPTEMBER 2025 [17]

The period from September 2024 to September 2025 showed an extremely dynamic trend for the paper from recycling market.

Starting from the figures for September 2024 (€ 65/ton for quality 1.02.00 and € 70/ton for quality 1.04.02), the market went through an initial phase of contraction, reaching its lowest point in December 2024, with € 38/ton for 1.02.00 and € 43/ton for 1.04.02.

2025 began with a gradual but steady recovery, which turned into a significant surge between March and April, culminating in the **highest values** for the first nine months of 2025 **reached in April**: € 105/ton for quality 1.02.00 and € 115/ton for quality 1.04.02, the highest levels of the last year.

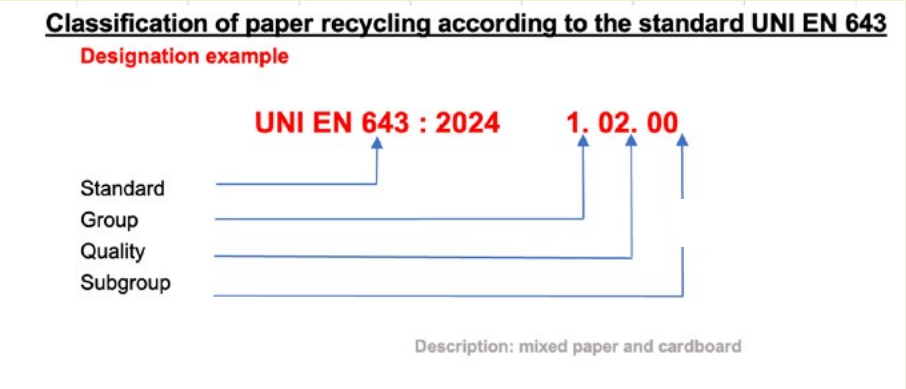
This was followed by an equally marked correction, which brought prices back to the **lows of September 2025** (€ 48/ton for 1.02.00 and € 50/ton for 1.04.02).

This trend highlights a phase of extreme structural instability, characterised by exceptionally wide fluctuations (over € 65/ton for quality 1.02.00 and €70/ton for quality 1.04.02), reflecting deep tensions between supply and demand.

Note n. 15
Milan Chamber of Commerce (CCIAA) price list data.

Note n. 16
In the Italian Paper from recycling industry, the technical reference, as reported in Ministerial Decree 188/2020, is the UNI EN 643 standard, which implements the EU standard EN 643. This specifies the European list of standardised qualities of paper and cardboard for recycling, secondary raw materials leaving waste treatment plants, and defines both their content and the substances that each type must not contain. According to the standard, paper from recycling is classified into approximately 95 types divided into 5 groups according to a specific code.

- Ordinary quality (1.y.w),
- Average quality (2.y.w),
- Superior quality (3.y.w),
- Kraft quality (4.y.w),
- Special quality (5.y.w).



Note n. 17
Milan Chamber of Commerce (CCIAA) price list data.

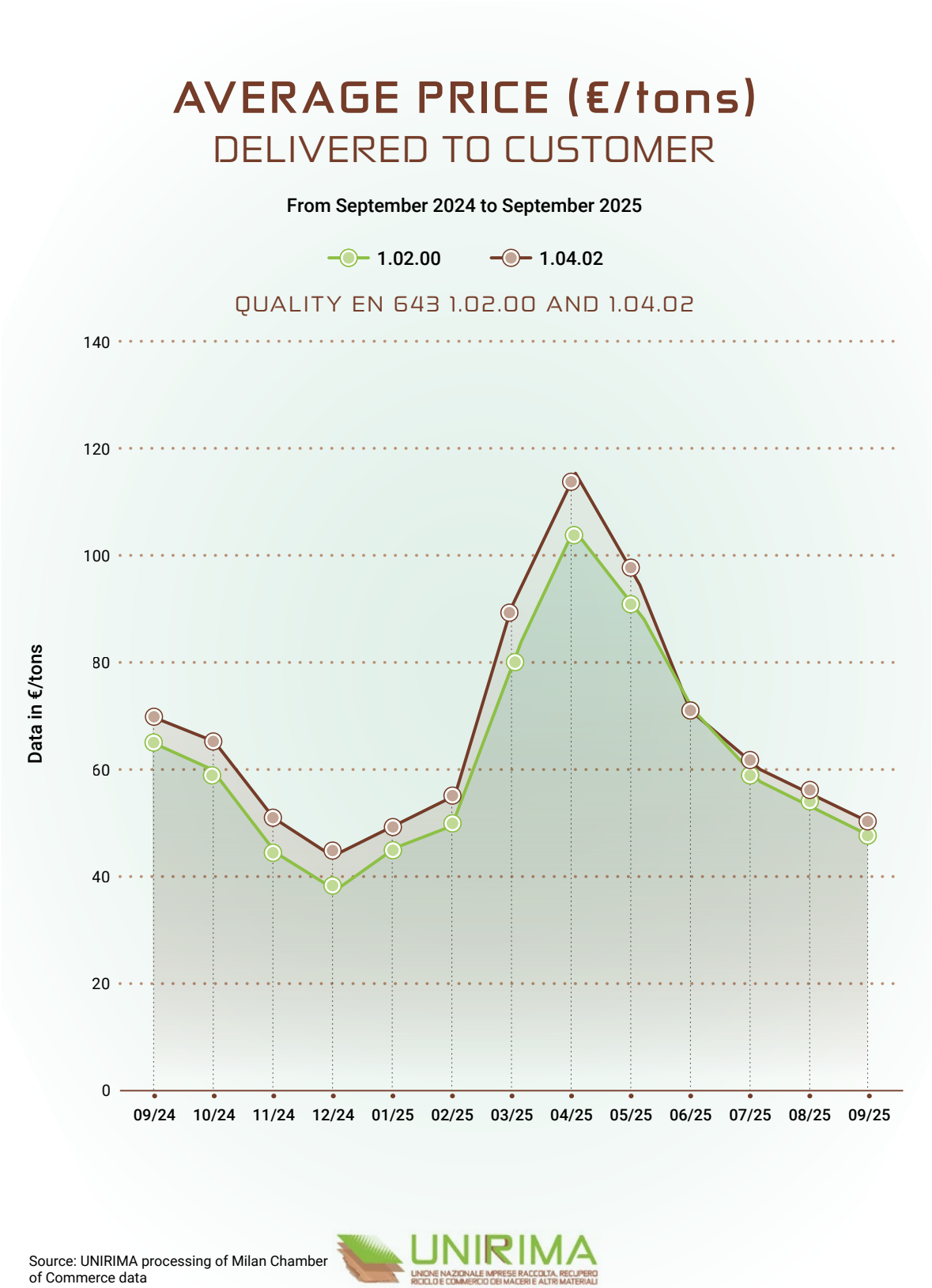


FIGURE 11: AVERAGE PRICE DELIVERED TO CUSTOMER (€/TONS) FOR CARDBOARD QUALITY UNI EN 643 1.02.00 AND 1.04.02 FROM SEPTEMBER 2024 TO SEPTEMBER 2025

1.3.2 EVOLUTION OF COMIECO AUCTIONS' AWARDS

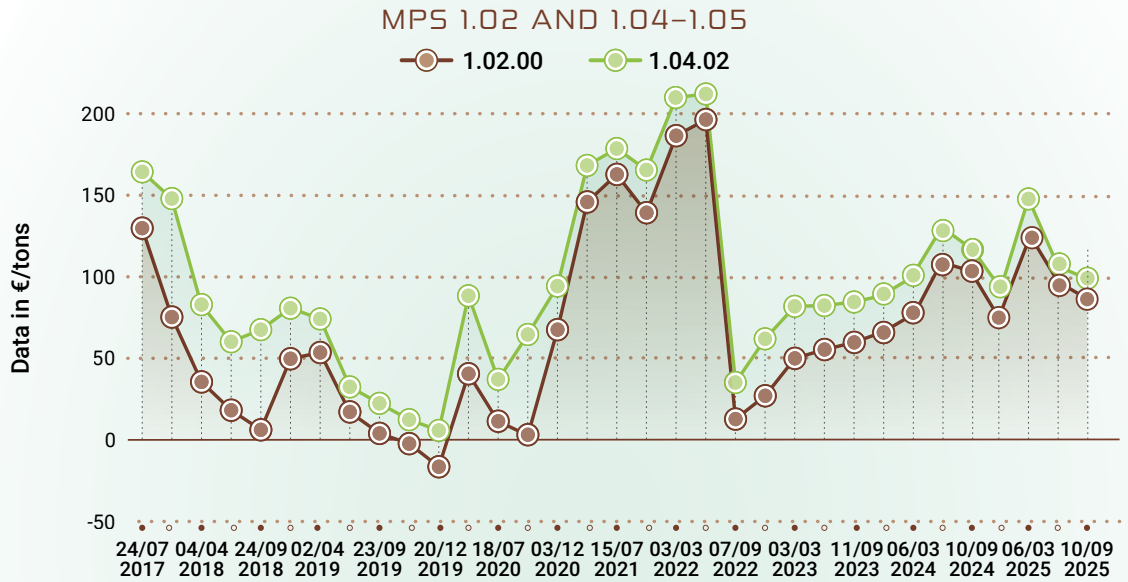
Comieco auctions also show several distinct phases, with trends broadly in line with those of the CCIAA quotations, despite different values:

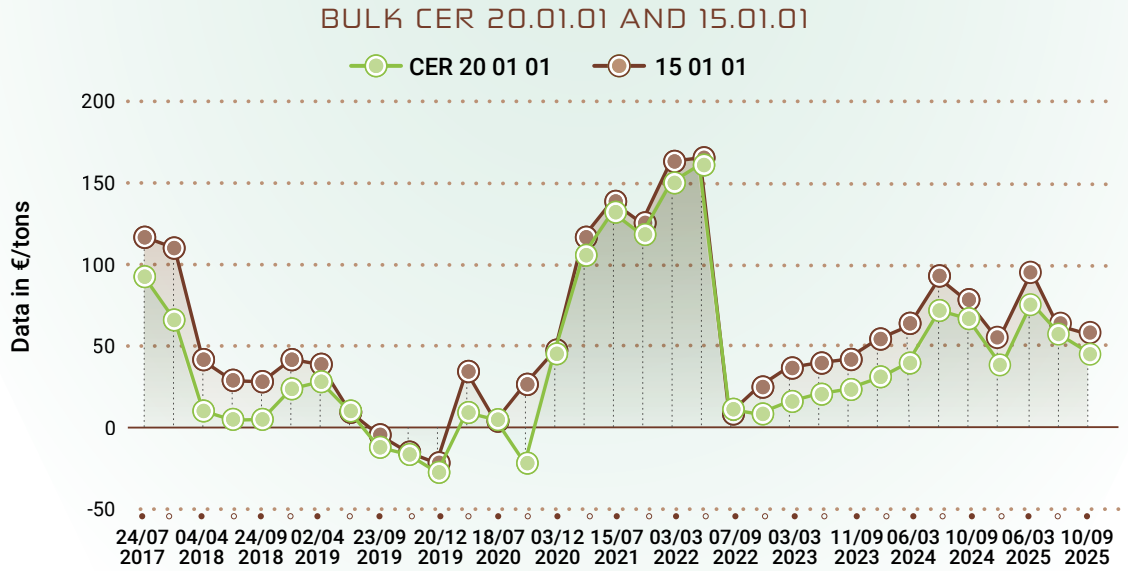
- **2017-2019**: the high values of the July auction (€ 162/ton and € 128/ton for grades 1.04 and 1.02 respectively) were followed by a steady decline, bringing both grades to their lowest auction values to date between the end of 2018 and the beginning of 2019 [18]. This collapse was a consequence of the drastic reduction in imports of paper from recycling by China, which was the main outlet market.
- **2020-May 2022**: a gradual recovery was observed, abruptly interrupted by a new collapse in mid-2020, followed by a more rapid recovery that brought values steadily above € 140/ton for grade 1.02 and € 160/ton for grade 1.04 for five consecutive auctions from April 2021 to May 2022, when historical highs were reached (€ 193/ton and € 209/ton for grades 1.02 and 1.04 respectively).
- **September 2022-2023**: the September auction saw a sharp drop in prices, which fell to € 12/ton for quality 1.02 and € 34/ton for quality 1.04, before beginning a recovery that reached € 67/ton and € 89/ton for qualities 1.02 and 1.04 respectively at the December 2023 auction.
- **2024-September 2025**: the last period saw growth culminating in the March auction highs (€ 124 and € 146/ton for grades 1.02 and 1.04 respectively), followed by a decline in the last two auctions, which brought values to € 85/ton and € 97/ton for grades 1.02 and 1.04 respectively in the September 2025 auction.

18 - The MPS/EoW 1.02 auction reached a negative value in December 2019.

AVERAGE PRICE (€/tons)
COMIECO AUCTIONS

From July 2017 to September 2025





Source: UNIRIMA elaborations of Comieco's auctions data

FIGURE 12: AVERAGE PRICE TREND COMIECO AUCTIONS MPS/EOW 1.02 E 1.04-1.05, BULK CER 20.01.01 AND 15.01.01 (JULY 2017 - SEPTEMBER 2025)

The analysis of the composition of the successful bidders shows a structural predominance of **paper mills**, which are confirmed **as the main buyers in Comieco auctions**, although there has been an increase in awards to plants over the last year. The share of awards to paper mills stands at almost 59% for MPS EoW 1.02.00 and around 80% for MPS EoW 1.04 and 1.05. Particularly significant is the concentration in the MPS EoW 1.04 and 1.05 segment, where a single paper mill accounted for almost 33% of the total quantities in the period analysed.

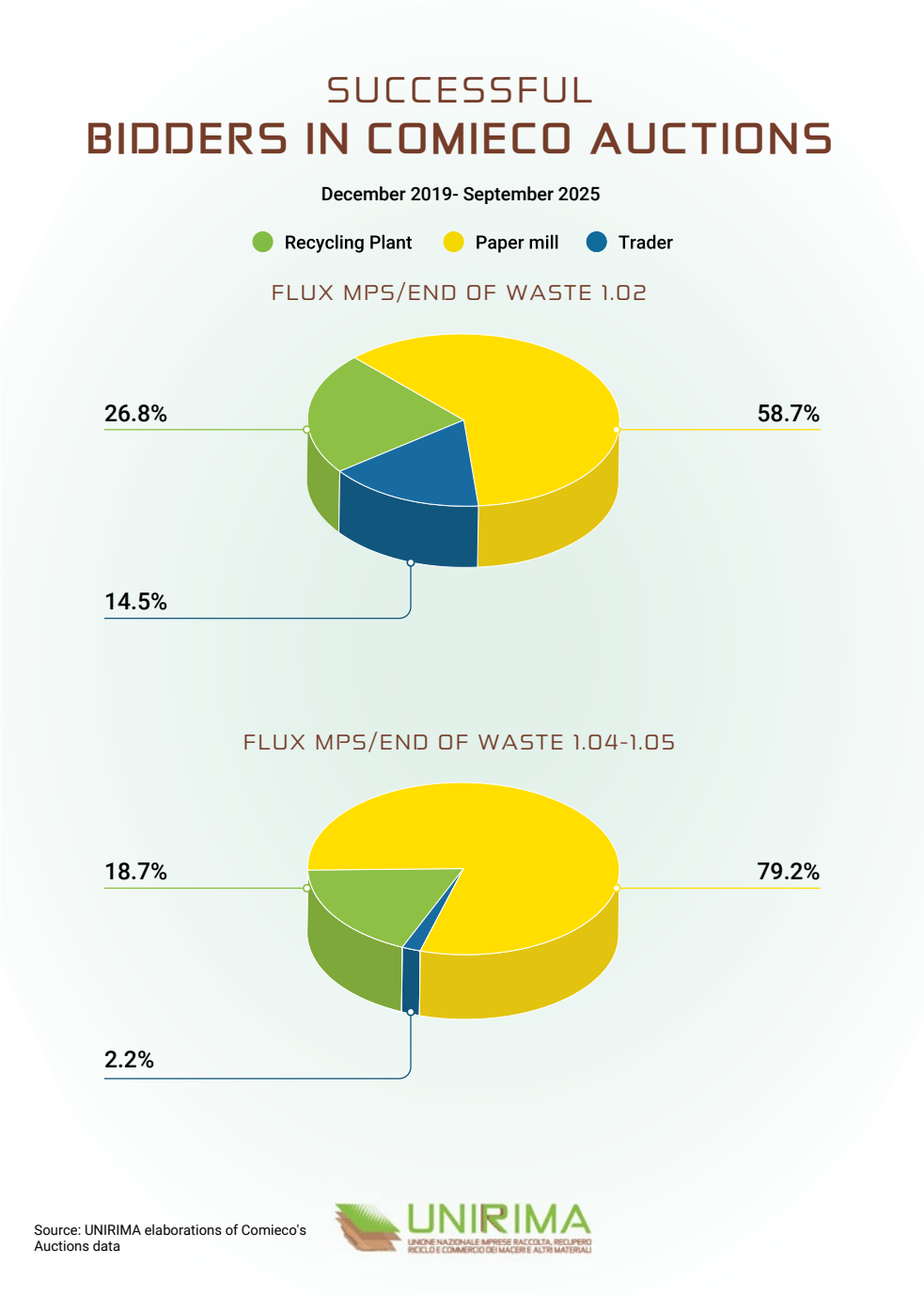


FIGURE 13: SUCCESSFUL BIDDERS IN COMIECO AUCTIONS FOR MPS EOW 1.02 AND 1.04-1.05, FROM DECEMBER 2019 TO SEPTEMBER 2025

1.4 QUOTATIONS FOR PAPER WASTE FROM ECONOMIC ACTIVITIES

The following graphs show the trend in loose material average prices DAP treatment plant [19] for the following types of paper: **Over Issued Newspaper (OINP)** and **New Corrugated Cuttings (NCC)**.

These are **waste produced by economic activities** that are collected and recycled by private companies. The availability of these typologies is still affected by the structural crisis in the publishing sector [20] , with consequent effects on price dynamics due to the progressive reduction in the supply of material on the market.

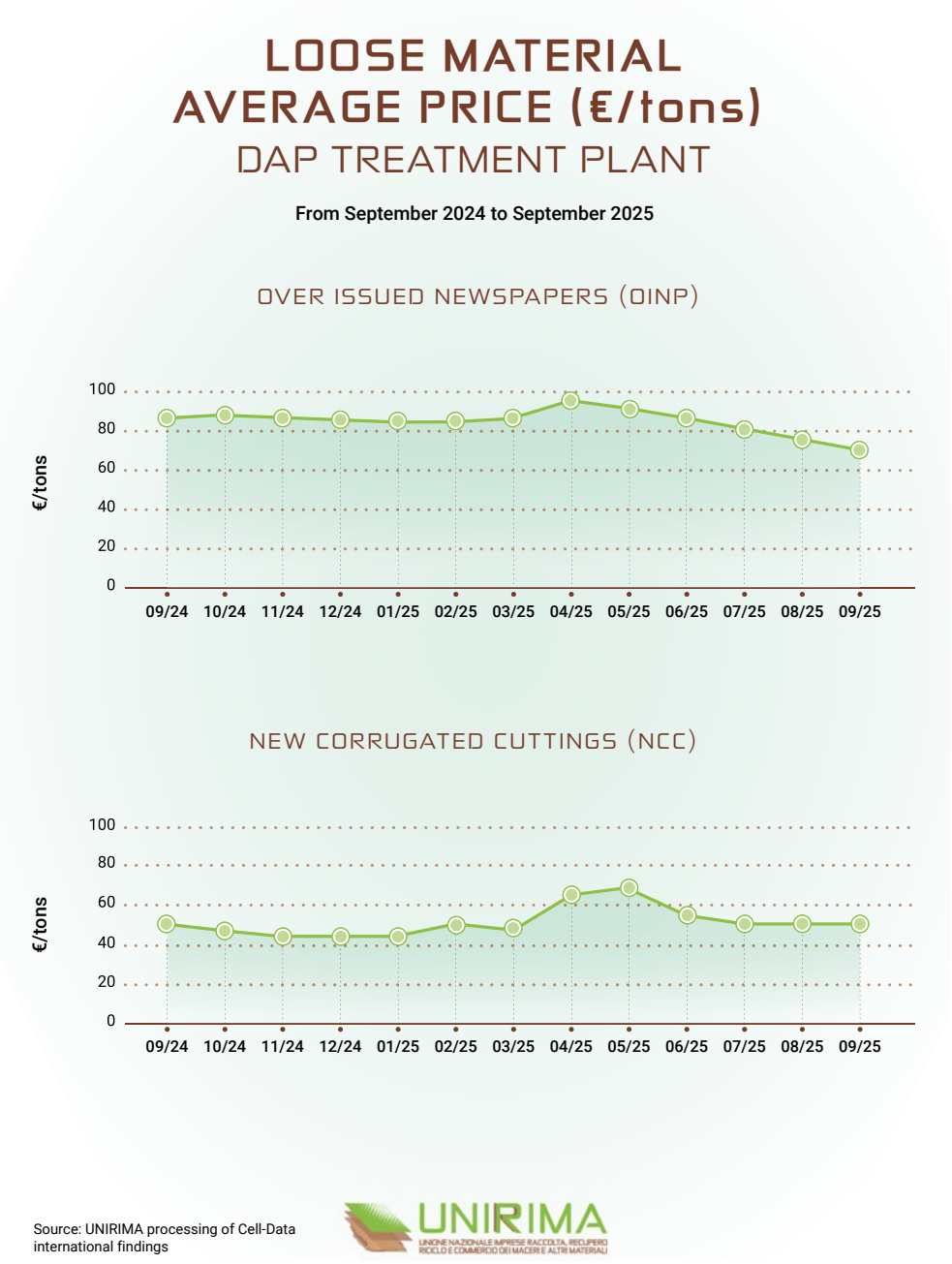


FIGURE 14: OINP AND NCC LOOSE MATERIAL AVERAGE PRICE - DAP TREATMENT PLANT SEPTEMBER 2024 SEPTEMBER 2025 (€/TONS)

19 - Data by Cell-Data Commodity S.r.l.
20 - Italian Communications Regulatory Authority (AGCOM), Observatory on Communications 2/2025.

In the period from September 2024 to September 2025, the price trends for the two types of paper waste showed different characteristics:

- Over Issued Newspaper have shown a substantial decline in recent months, falling to an average value of € 70/ton;
- New Corrugated Cuttings, after an initial increase in prices in the early months of 2025, have fallen since June, settling at an average value of € 51/ton in September.

The structural crisis in the publishing sector and the resulting low demand for material on the market continues to be the main factor behind the crisis in this sector.

1.5 THE CONAI ENVIRONMENTAL CONTRIBUTION

After the peak of 55 €/ton reached in 2020, the "basic" **Conai Environmental Contribution (CAC)** [21] for paper and cardboard packaging has progressively decreased thanks to the increase in the market values of paper from recycling. Indeed, it reached 25 €/ton in July 2021 and then dropped to 10 €/ton in January 2022, until reaching 5 €/ton in July 2022. The contribution remained unchanged for most of 2023, but increased significantly from October, rising from €5 to 35 €/ton and then to 65 €/ton from April 2024. From October 2025, **the CAC for paper and cardboard packaging is 45 €/ton.**

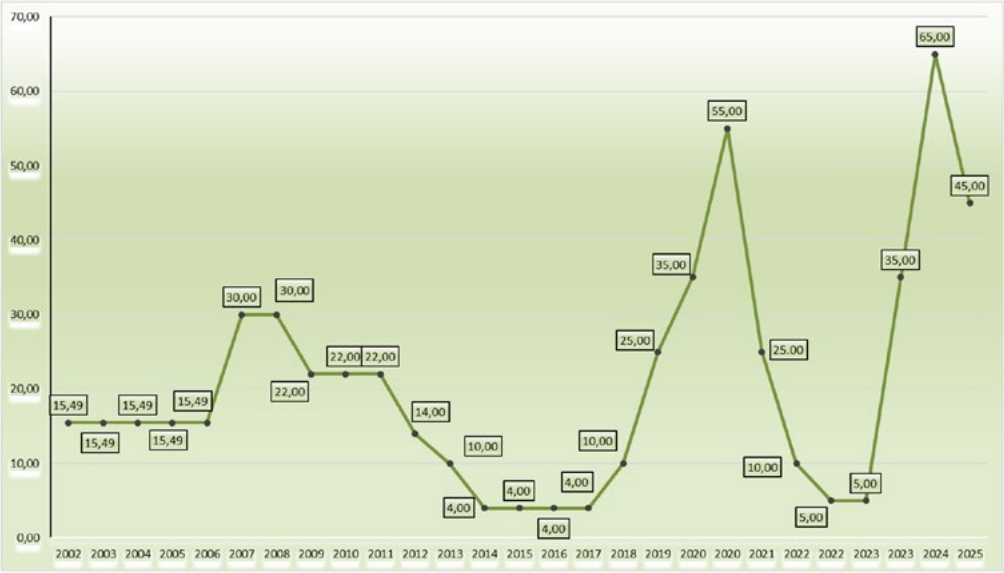


FIGURE 15: PAPER PACKAGING CAC TREND BETWEEN 2002 AND 2025 (€/TONS)
SOURCE: UNIRIMA PROCESSING OF CONAI DATA

Conai also applies an additional contribution (the so-called "**extra CAC**") initially introduced only for paper-primarily composite containers suitable for containing liquids (**CPL**). Then an extra CAC was applied to **other types of composite packaging too**, mainly paper and cardboard and other than CPL's. The extra CAC values in force from October the 1st are the following:

- Band 3.1 (Type B1 Composites (CERTIFIED)): +10 €/ton.
- Band 4 (CPL): +70 €/ton.
- Band 5.1 (Type C1 Composites (CERTIFIED)): +65 €/ton.
- Band 5.2 (Type C2 Composites (UNCERTIFIED)): +110 €/ton.
- Band 6 (Type D Composites): +240 €/ton.

21 - From the Conai website: "The Conai Environmental Contribution is the form of financing through which Conai distributes between producers and users the cost of the charges for separate collection, recycling and recovery of packaging waste. These costs, based on the provisions of Legislative Decree 152/06, are distributed "in proportion to the total quantity, weight and type of packaging material placed on the national market".

2. THE INTERNATIONAL FRAMEWORK

2025 confirmed a global economic scenario marked by growing complexity and intensifying geopolitical conflicts that undermine international cooperation. The Middle East crisis affected the security of shipping routes in the Red Sea, leading to higher transport costs, while trade tensions between the United States and other countries, with the introduction of customs duties, had a consequent impact on global trade.
Within this framework, the world economy experienced a moderate and uneven growth. Among advanced economies, growth was strongest in the United States (+2.8%), driven by investment in the technology and manufacturing sectors and robust private consumption. The Eurozone stood out with more modest growth (+0.9%), while economic activity stagnated in Japan (+0.2%). Among emerging economies, India recorded the strongest expansion (+6.7%), while in China, thanks to an acceleration in exports, the 5% growth target was achieved, despite the consequences of the crisis in the real estate sector [22].
The sharp increase of uncertainty regarding trade policies and the future of international relations, linked to the more protectionist stance adopted by the US, has impacted Italy's growth prospects. Italian exports of goods fell by 0.3%, with Italy's share of world trade declining slightly in a context of weakness in the European manufacturing cycle.
In this complex scenario, **the Italian sector of paper from recycling** is facing significant challenges, similar to those experienced by other European partners. Paper from recycling exports fell compared to the previous year, recording a decline of 10.6%, which can be attributed to several factors arising from the worsening geopolitical crises that are redefining global supply chains, posing new challenges to the ecological transition. Despite these difficulties, **the expertise of the sector's operators** in identifying new markets remains a distinctive feature.

22 - Bank of Italy (2025), Annual Report 2024.

2.1 THE GLOBAL PRODUCTION OF PAPER AND CARDBOARD

In 2024, the global production of paper and cardboard is estimated at around 423 million tonnes (figure 16), up 4% on the previous year. Asia produces around 52.5% of the total, while Europe produces 22.6%

	Total Paper Production (ton)			
Countries	2022	2023	2024	D 2024-2023 (%)
France	7.093.900	6.143.800	6.531.400	6%
Germany	21.612.000	18.636.000	19.191.000	3%
Italy	8.695.986	7.463.900	7.956.846	7%
Spain	6.354.000	6.062.506	6.561.500	8%
EU	**85.024.000**	**73.933.000**	**78.742.000**	**7%**
United Kingdom	3.460.000	3.220.000	3.284.400	2%
USA	81.000.000	79.704.000	78.109.920	-2%
China	124.250.000	129.314.875	136.250.000	5%
World	**425.300.000**	**408.700.000**	**423.413.200**	**4%**

FIGURE 16: WORLD AND SELECTED COUNTRIES' PAPER PRODUCTION IN 2024 [23]
Fonte: UNIRIMA processing of various sources

In 2024, the production of paper and cardboard in the EU was just over 78.7 million tonnes [24], **up 7% on the previous year**. Half of the whole paper production can be attributed to four countries: Germany (24%), Italy (10%), France and Spain (both 8%).

Total paper from recycling production in Europe in 2024 was 52.1 million tonnes (-0.1% compared to 2023). European use of paper from recycling in 2024 was 46.1 million tonnes [25].

The surplus compared to European demand, amounting to 7.9 million tonnes (15.1% of total production), was exported, thus ensuring the continued increase in separate collection of paper and cardboard waste in EU countries.

Italy shares second place in Europe with Spain for paper from recycling use, while Germany ranks first. France and the United Kingdom follow.

23 -Any differences with respect to previous years are due to data updates.
24 -UNIRIMA processing of various sources.
25 -Data from CEPI (Confederation of European Paper Industries). The calculation of paper from recycling use is based on the standard formula: Use = (Production + Imports) - Exports. For 2024, European paper from recycling use is therefore estimated as follows: 52.1 (Production) + 1.9 (Imports) - 7.9 (Exports) = 46.1 million tonnes.

2.2 INTERNATIONAL TRADE OF PAPER FROM RECYCLING

The world's leading importer of paper from recycling, **India**, recorded imports of 5.8 million tonnes in 2024, **down 25% compared to 2023**, with a value of 1.2 billion US dollars, down 15% (figure 17).

FIGURE 17: IMPORTS AND EXPORTS OF PAPER FROM RECYCLING, QUANTITY AND VALUE, 2001-2024, INDIA
Source: UNIRIMA elaborations on UN Comtrade data, ITC

Almost 60% of the quantities imported by India in 2024 come from just four countries: the United States (30%), the United Kingdom (14%), the United Arab Emirates and Italy (both 7%).

Imports of paper from recycling from **Indonesia** fell by **15% in terms of quantity compared to the previous year** (figure 18), with a more contained decline of 6% in terms of value. In 2024, imports stood at 2.74 million tonnes, with an economic value of 479 million dollars.

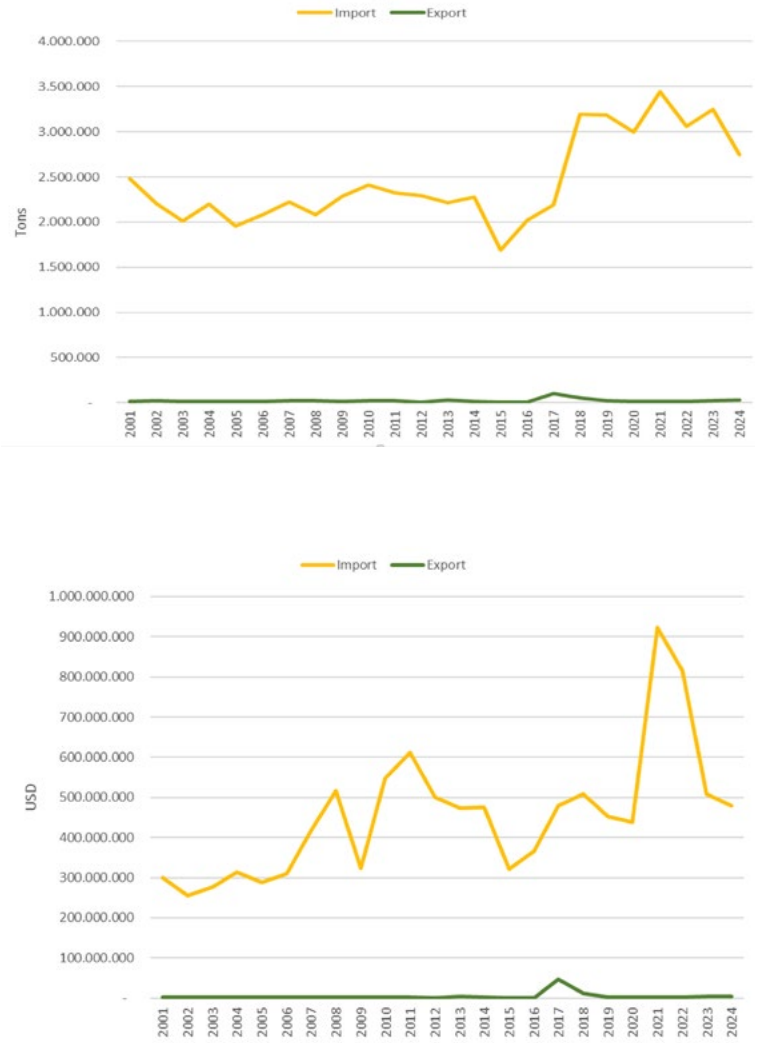


FIGURE 18: IMPORTS AND EXPORTS OF PAPER FROM RECYCLING, 2001-2024, INDONESIA
Source: UNIRIMA elaborations on UN Comtrade data, ITC

Most of the quantities come from Australia (21%), United States (13%), Italy (11%) and the Netherlands (11%).

China's imports in 2024 stand at around 586.000 tonnes (figure 19), a figure that is a**lmost stable compared to the previous year**, but with a slight decrease in value of 4%, and in any case considerably lower than those recorded in the same context a few years ago.

FIGURE 19: IMPORTS AND EXPORTS OF PAPER FROM RECYCLING, QUANTITY AND VALUE, 2001-2024, CHINA
Source: UNIRIMA elaborations on UN Comtrade data, ITC

The world's leading exporters of paper from recycling, the **United States**, continue to show a decline in exports also in 2024, corresponding to 7% in terms of quantity but increasing to 2% in terms of value (figure 20). The main trading partner remains India, which in 2024 was the destination for 17% of total exported quantities, followed by Thailand, Mexico and Malaysia, all with 15% quotes.

FIGURE 20: IMPORTS AND EXPORTS OF PAPER FROM RECYCLING, QUANTITY AND VALUE, 2001-2024, UNITED STATES
Source: UNIRIMA elaborations on UN Comtrade data, ITC

The **United Kingdom** also continued to record a **slight decline in 2024, equal to 4% of the quantities exported**, but with a marked increase of 19% in terms of value (figure 21). The main destinations were India, accounting for 24% of tonnes exported, Malaysia (15%), Vietnam (14%) and Turkey (10%).

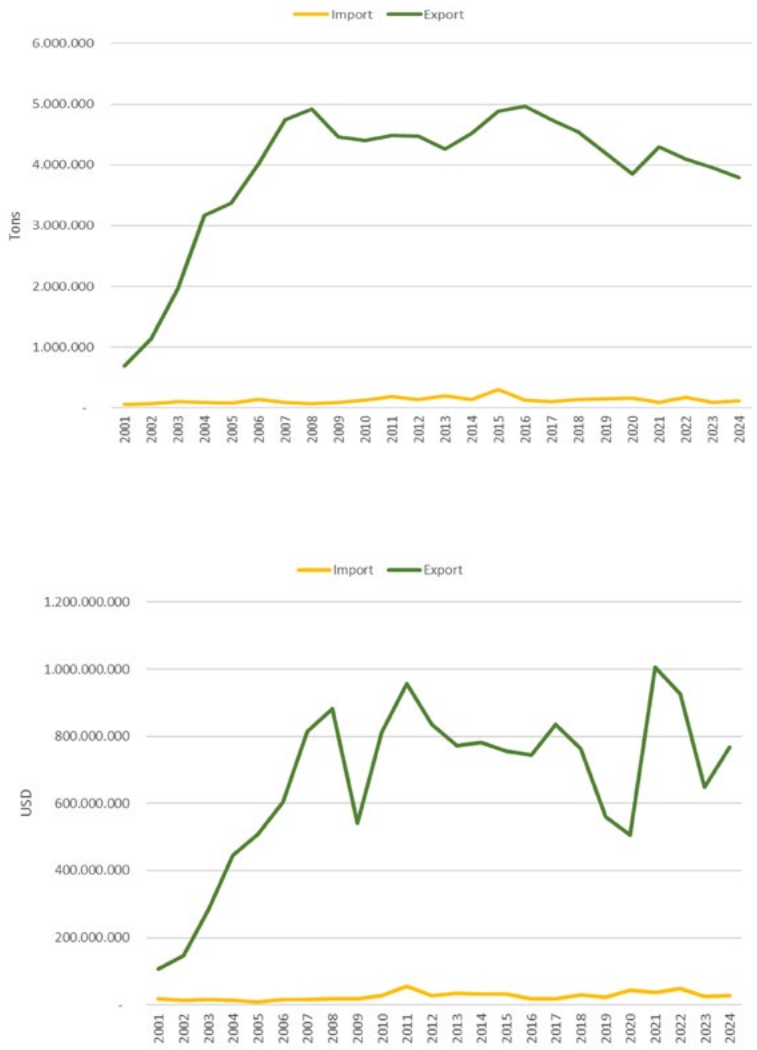


FIGURE 21: IMPORTS AND EXPORTS OF PAPER FROM RECYCLING, QUANTITY AND VALUE, 2001-2024, UNITED KINGDOM
Source: UNIRIMA elaborations on UN Comtrade data, ITC

In 2024, **France exported 2.4 million tonnes of paper from recycling**, down 8% compared to 2024, but with a significant 10% increase in value. The main export destinations are Spain, accounting for 47% of the total, and Germany with 22%. They are followed by Vietnam (9%) and Belgium (5%).

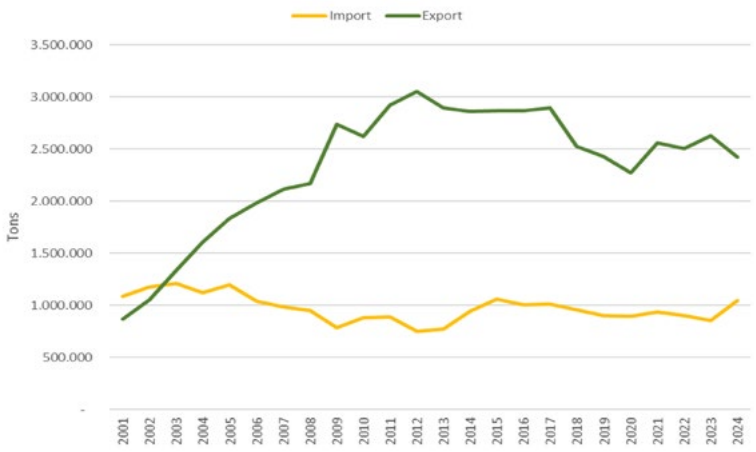


FIGURE 22: IMPORTS AND EXPORTS OF PAPER FROM RECYCLING, QUANTITY AND VALUE, 2001-2024, FRANCE
Source: UNIRIMA elaborations on UN Comtrade data, ITC

Germany saw a slight **recovery in export volumes** (+1%) with a sharp increase in value (+28%). In 2024, the main destinations were other EU countries: the Netherlands (28%), Austria (26%) and France (22%) above all.

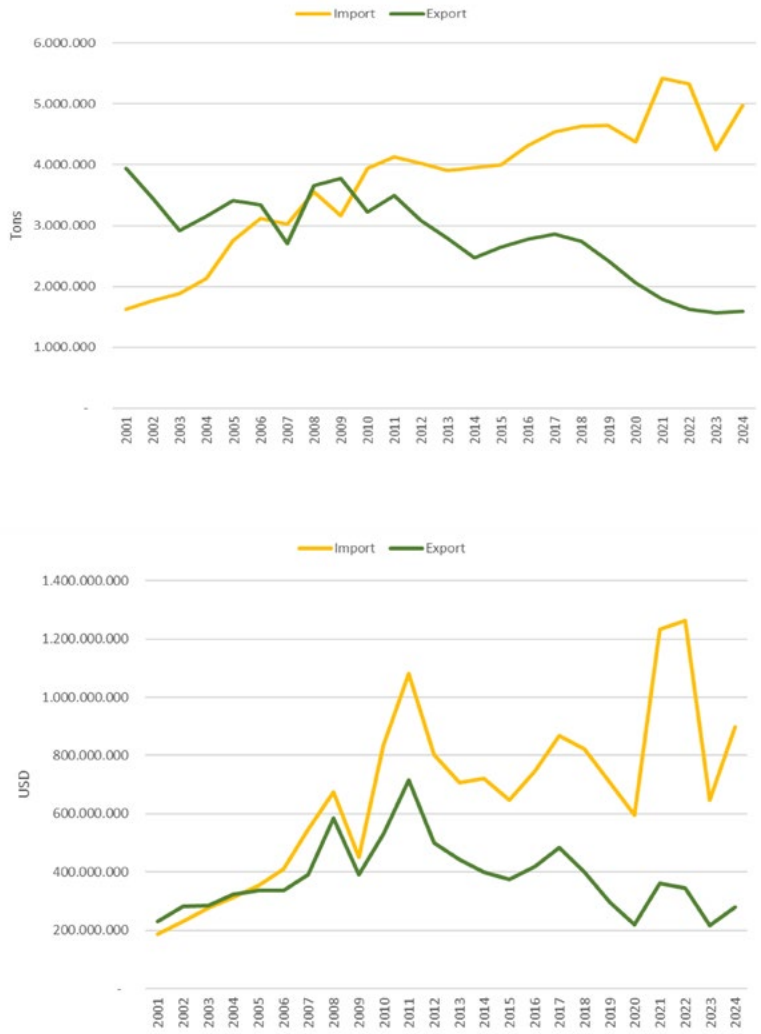
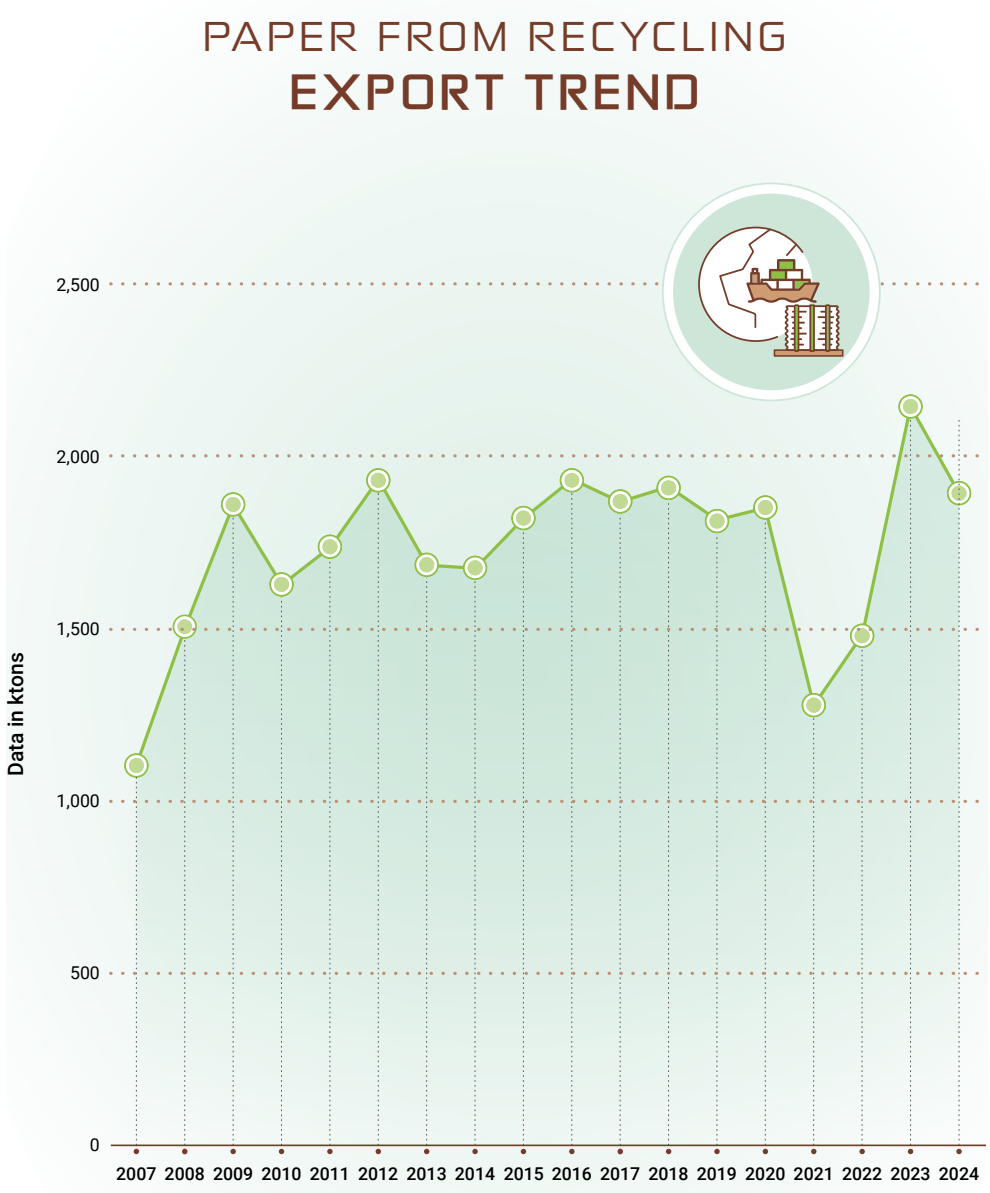


FIGURE 23: IMPORTS AND EXPORTS OF PAPER FROM RECYCLING, QUANTITY AND VALUE, 2001-2024, 2001-2024, GERMANY
Source: UNIRIMA elaborations on UN Comtrade data, ITC

2.3 ITALIAN EXPORTS OF PAPER FROM RECYCLING

Our Country has been a net exporter of paper from recycling for over 20 years. The quantities exported in **2024** amounted **to 1.9 million tonnes**, a decrease of approximately 0.225 million tonnes compared to the previous year.



Source: UNIRIMA processing of data from ISTAT

FIGURE 24: PAPER FROM RECYCLING EXPORT TREND, 2007-2024, ITALY

In 2024, India was the leading trading partner, accounting for 23% of total exports, corresponding to over 437,570 tonnes. Next came Indonesia (295,051 tonnes, or 15.5%), Austria (207,926 tonnes, or 10.9%), Vietnam (187,925 tonnes, or 9.9%) and Germany (171,925 tonnes, or 9%).

The breakdown of **Italy's trading partners for paper from recycling exports in 2024** is shown in figure 25 and table 26.

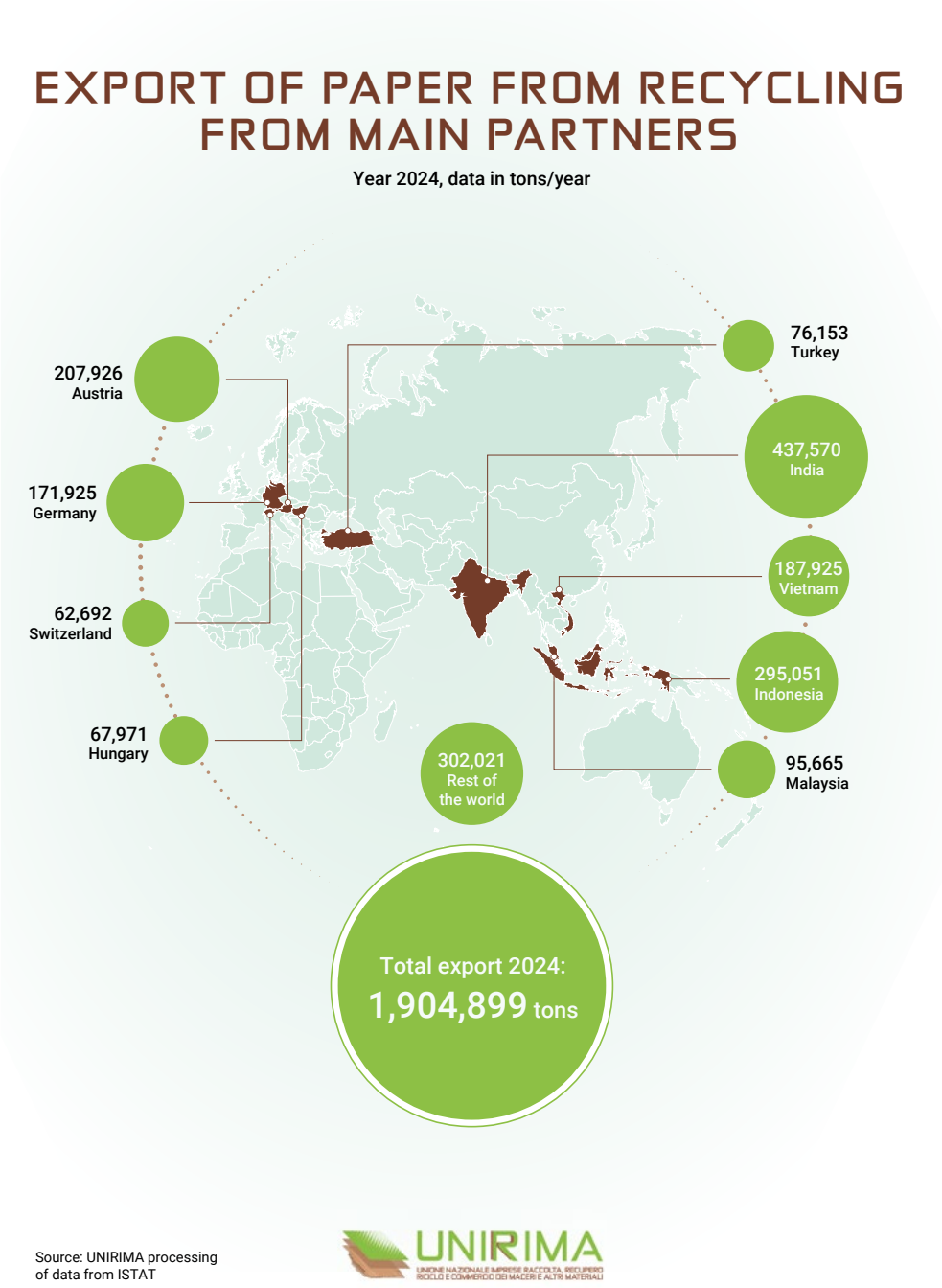


FIGURE 25: EXPORT OF PAPER FROM RECYCLING FROM MAIN PARTNERS, 2024, ITALY

Country	Export	
	tons/y	% quantity
India	437.570	23,0%
Indonesia	295.051	15,5%
Austria	207.926	10,9%
Vietnam	187.925	9,9%
Germany	171.925	9,0%
Malaysia	95.665	5,0%
Turkiye	76.153	4,0%
Hungary	67.971	3,6%
Switzerland	62.692	3,3%
Rest of the world	302.021	15,9%
TOTAL	**1.904.899**	**100,0%**

FIGURE 26: PAPER FROM RECYCLING EXPORT DATA, 2024, ITALY
Source: UNIRIMA processing of ISTAT data

Exports in the **first half of 2025** reached 837,811 tonnes, representing a decrease (-15%) compared to the same period last year. Most exports, approximately **51%** of the total for the first half of the year, were destined for **South-East** Asia and **India**.

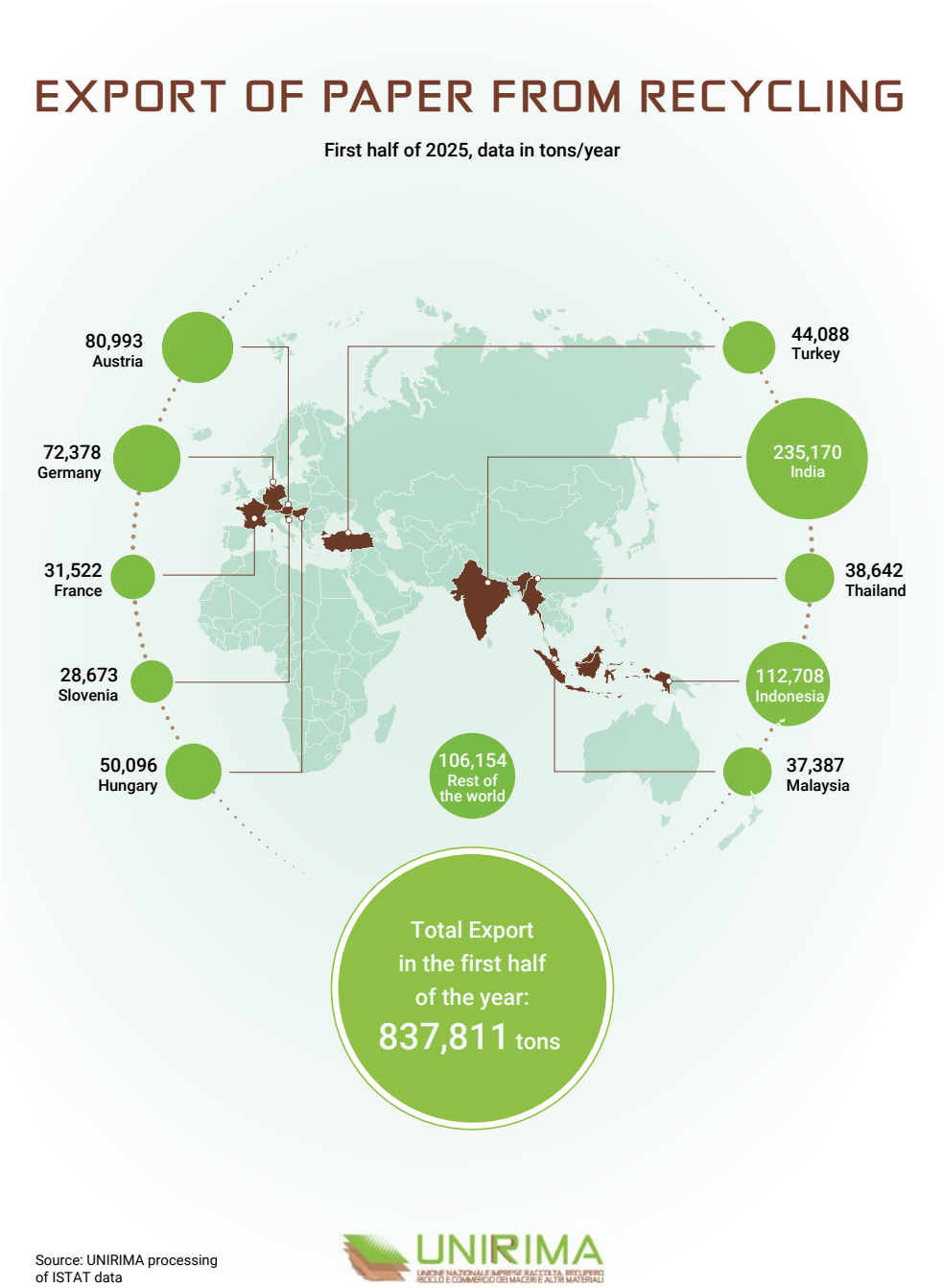


FIGURE 27: EXPORT OF PAPER FROM RECYCLING TO MAIN PARTNERS - 1ST HALF OF 2025

In the first six months of 2025, India confirmed its position as the main destination for Italian paper from recycling exports, accounting for 28% of the total, overtaking Indonesia (13%) which saw a 39% reduction in imports from Italy compared to the same period last year. The other main destinations for exports were Austria, Germany and Hungary.

Country	Export (tons/sem)	% quantity
India	235.170	28,1%
Indonesia	112.708	13,5%
Austria	80.993	9,7%
Germany	72.378	8,6%
Hungary	50.096	6,0%
Turkiye	44.088	5,3%
Thailand	38.642	4,6%
Malaysia	37.387	4,5%
France	31.522	3,8%
Slovenia	28.673	3,4%
Rest of the world	106.154	12,7%
TOTAL	**837.811**	**100,0%**

FIGURE 28: PAPER FROM RECYCLING EXPORT DATA, 1ST HALF OF 2025, ITALY
Source: UNIRIMA processing of ISTAT data

Figure 29 shows a comparison between export volumes in the first and second quarters for the years 2022, 2023, 2024 and 2025.

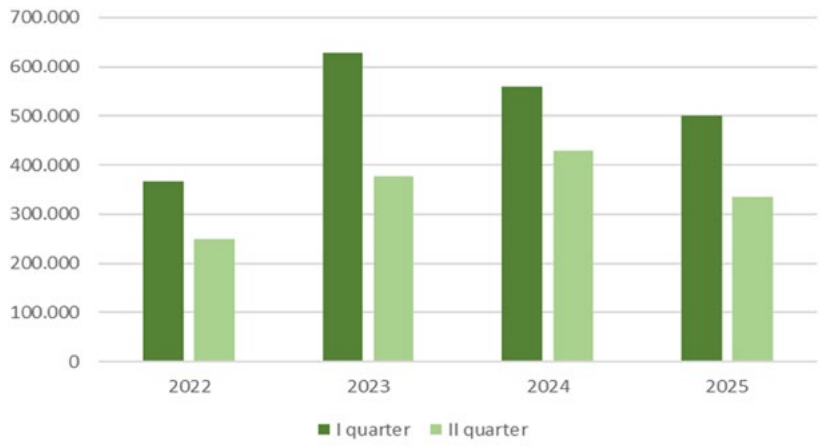


FIGURE 29: PAPER FROM RECYCLING EXPORTS - COMPARISON BETWEEN THE FIRST AND SECOND QUARTERS OF 2022, 2023, 2024 AND 2025
Source: UNIRIMA processing of ISTAT data

The first quarter of 2024 saw a decline (-11%), while the second quarter recorded an increase of 14% compared to the same period of the previous year. As for 2025, exports in the first and second quarters decreased in terms of quantity, by 10% and 22% respectively, compared to the same periods of the previous year.

2.3.1 ITALIAN IMPORTS

The **quantities imported by Italy** [26], amounting to approximately 289.000 tonnes, come mainly from the United States, which accounts for 28.4% of the total, corresponding to over 81.800 tonnes. This is followed by France (57,721 tonnes, or 20%), Germany (39.942 tonnes, or 13.9%), and then Switzerland and the Netherlands (18,521 tonnes and 18.419 tonnes respectively, both accounting for 6.4%).

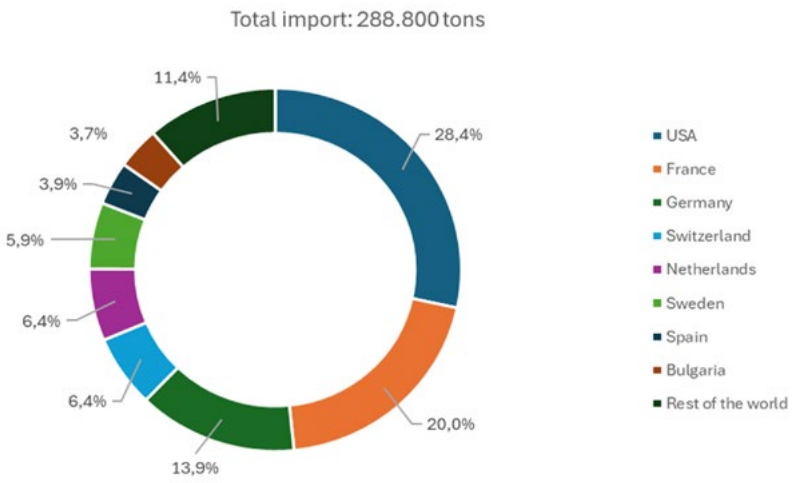


FIGURE 30: MAJOR PARTNERS IN PAPER FROM RECYCLING IMPORTS, 2024, ITALY

Country	Import	
	tons/y	% quantity
USA	81.800	28,4%
France	57.721	20,0%
Germany	39.942	13,9%
Switzerland	18.521	6,4%
Netherlands	18.419	6,4%
Sweden	17.074	5,9%
Spain	11.127	3,9%
Bulgaria	10.773	3,7%
Rest of the world	32.917	11,4%
TOTAL	**288.800**	**100,0%**

FIGURE 31: PAPER FROM RECYCLING IMPORTS DATA, 2024, ITALY
Source: UNIRIMA processing of ISTAT data

26 - This is mainly pre-consumer material.

Imports in the first half of 2025 stood at over sixty thousand tonnes (62.490 tonnes), up 3% on the same period last year. The United States of America, with 35% of total exports, confirmed its role as the main supplier of paper from recycling to Italy. Other import channels, as shown in the table below, are France, the Netherlands and Germany.

Country	Import (tons/sem)	% quantity
United States	21.605	34,6%
France	14.417	23,1%
Netherlands	4.544	7,3%
Germany	3.980	6,4%
Guatemala	3.387	5,4%
Czech Republic	3.550	5,7%
Rest of the world	11.008	17,6%
TOTAL	**62.490**	**100,0%**

FIGURE 32: PAPER FROM RECYCLING IMPORTS TO MAIN PARTNERS - FIRST HALF OF 2025
Source: UNIRIMA processing of ISTAT data

Figure 33 shows a comparison between import quantities for the first and second quarters for the years 2022, 2023, 2024 and 2025.

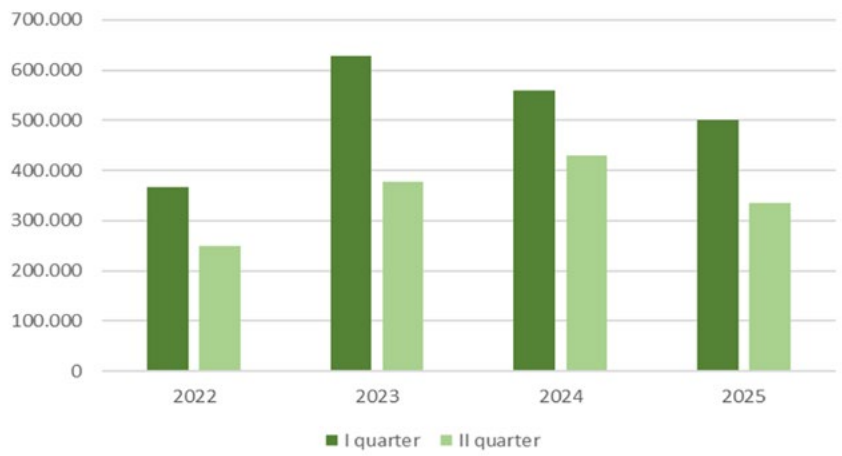


FIGURE 33: PAPER FROM RECYCLING IMPORTS - COMPARISON BETWEEN THE FIRST AND SECOND QUARTERS OF 2022, 2023, 2024 AND 2025
Source: UNIRIMA processing of ISTAT data

In 2024, the first quarter registered a decline (-3%), while the second quarter recorded an increase of 4% compared to the same period of the previous year. As for 2025, imports in the first and second quarters increased by 3% and 4% in terms of quantity compared to the same periods of the previous year.

3. INNOVATION AND BUREAUCRACY: THE DEVELOPMENTS IN THE SECTOR BETWEEN OLD AND NEW CHALLENGES

In recent years, the sector has been experiencing profound changes, affecting both the industrial profile and the global dynamics of commodity markets. The current challenges are diverse and driven by complex dynamics that can significantly affect profitability, operational efficiency and competitiveness. In addition to dealing with the impact of European policies and international issues, and facing the direct consequences of **attempts to restrict global markets**, Italian companies are now called upon to address the imperative of innovation, which involves, among other things, the need to modernise plants and facilities, an essential element in ensuring a good level of competitiveness and aligning with increasingly stringent European targets. Linked to this aspect is the push towards digitalisation, which is now essential for operating effectively at national and European level.

Non-technological barriers, which have been a feature of the Italian context for several decades, continue to have a significant impact on companies' activities. These barriers mainly result from the accumulation of bureaucratic burdens and requirements, with the associated costs, as well as from a complex and difficult-to-interpret regulatory framework, which often hinders the development of the recycling sector.

The issue of **competition** is also always relevant. Companies operating in the paper from recycling sector face significant pressure from large multi-utility companies active in waste management which, by focusing on downstream integration, are taking away market share. There is also a growing concentration of outlet markets in a few large international players, compounded by the persistence, in various contexts, of distorting factors that inhibit the full implementation of free market principles. Nevertheless, in recent months there have been signs of a partial reversal of this trend, with the introduction of some reforms to foster greater efficiency and genuine respect for competitive dynamics. The hope is that this trend will steadily consolidate over the coming years, creating a more favourable and conducive environment for the sector's development.

3.1 COMPETITION

The concrete implementation of a circular economy model cannot ignore the integration of the principle of competition, a fundamental lever for ecological transition. This is even more true in a complex sector such as waste management, where promoting and maintaining an open and competitive market is crucial to ensure the efficient use of secondary raw materials, reduce dependence on virgin raw materials, and promote a more sustainable economic system, as well as stimulate virtuous dynamics that foster investment, technological development and innovation.

Nevertheless, and although the principle of competition is expressly stated in legislation, gaps and distortions still persist in the Italian context. To date, the scenario whereby waste collection, treatment and recycling are entrusted to a single operator is far from rare: a circumstance that hinders market access by new players who could guarantee greater efficiency and effectiveness. Also significant is the direct control that many public administrations still exercise over management activities, in some cases creating a de facto monopoly that limits competitiveness and slows down the overall development of the sector. This situation is problematic in itself and is aggravated by other critical issues, from a lack of transparency to the late adoption or failure to implement corrective measures to resolve delays and inefficiencies.

The approval of the Annual Market and Competition Draft Law, on June 4 this year, with the introduction of reform features explicitly aimed at promoting the free market and ensuring greater efficiency, is emblematic of the attempt to mark a break with the past.

The provision, included in the framework of measures and interventions implementing the National Recovery and Resilience Plan (PNRR), constitutes a partial realisation of the requests coming by various parties over the last ten years: most recently, the report sent to the Government on December 20, 2024 by the AGCM, the Italian Competition and Market Guarantor Authority (report AS2045). In this document, starting from an analysis focused on three macro-areas considered as priorities and strategic for the country's economic growth (namely, Energy and Port Infrastructure, Non-scheduled Public Transport and Local Public services), a series of proposals were listed aimed at correcting the critical issues and obstacles to competition identified in each of the areas analysed.

Embodying the spirit of the report, the Draft Law on Competition introduced some important new elements in the management of local public services. These include:

- stronger controls aimed at transparency during the award phase;

- the obligation for Municipalities to adopt a policy document for the service operator, requiring the implementation of corrective measures aimed at restoring and improving quality, improving cost efficiency and recovering any losses;
- the introduction of penalties for non-compliance with the provisions, both for the local authority and for the operator - for whom it has been established that violations may also result in the termination of the contract.

The Draft Law should be definitively approved by the end of this year.

3.2 COSTS OF BUREAUCRACY

Bureaucracy continues to be one of the main obstacles for Italian businesses: the maze of procedures, authorisations, tax obligations, rules and regulations is a significant burden in terms of both economic and time costs, and also translates into fewer resources for innovation, investment and staff training. This is a long-standing but still relevant problem, so much so that this year, in response to numerous complaints from associated companies, it was decided to dedicate the annual survey of the Centro Studi UNIRIMA to the costs of bureaucratic compliance.

Referring to the next chapter for an in-depth analysis of the results of the above-mentioned survey, we would like now to emphasise **that considerable efforts are also being made at European level to simplify the system**, driven by a growing awareness of how bureaucratic burdens can be a real obstacle to the competitiveness of businesses.

Within the framework of the Communication on the Single Market Strategy, presented by the European Commission at the end of May 2025, actions and priorities were outlined which, in addition to encouraging the expansion of small and medium-sized enterprises, explicitly aim to promote simplification and reduce bureaucratic burdens: one of the most important objectives in this regard is to achieve an overall reduction in administrative costs of 25% (and 35% specifically for small and medium-sized enterprises) by the end of the current mandate.

In accordance with this approach, and in line with the provisions of the previous communication 'A Competitiveness Compass for the EU' (January 2025), in July this year the Commission launched an initiative aimed at simplifying and streamlining administrative requirements related to environmental legislation in sectors involving the circular economy, industrial emissions and waste management, involving all relevant industrial and economic actors at the European level.

The stated objective of the initiative, which also included a public consul-

tation phase ended in September, is to assess the room for manoeuvre to achieve a significant reduction in administrative costs without compromising the environmental objectives agreed under current legislation. These are some of the measures currently being worked on:

- rationalising reporting/notification obligations;
- harmonisation of the provisions for authorised representatives for extended producer responsibility (EPR) in each Member State where a producer sells a product falling under EPR rules and on facilitation of EPR reporting;
- streamlining reporting obligations, removing double requirements to report, promoting further digitalisation of reporting, while maintaining the policy objectives;
- addressing permitting challenges relating to environment assessments based on experience recently gained such as under the Net Zero Industry Act.

Many of these measures were included in a Position Paper [27] that EuRIC, the European Recycling Industries Confederation, to which UNIRIMA belongs, submitted to the Commission as its contribution to the consultation. The document emphasises, among other things, the following requests:

- streamlining and acceleration of authorisation procedures, reduction of bureaucratic burdens and more digitalised and functional processes, with the introduction of a specific timetable to regulate authorisation procedures and subsequent legal actions at EU level;
- simplification of the definitions contained in the Waste Framework Directive, harmonisation of the implementation of EU rules and acceleration of the development of end-of-life criteria for waste at EU level, also with a view to limiting the fragmentation of the single market resulting from heterogeneous interpretations and implementations of EU rules by Member States;
- simplification and reduction of the frequency of reporting procedures, more effective and efficient digitalisation, with more agile digital processes and simplified reporting criteria.

3.3 WASTE SHIPMENTS REGULATION

As it is well known, one of the most significant developments at European level in recent years is the **Regulation (EU) 2024/1157 on shipments of waste**. Published in the Official Journal of the European Union on April 30, 2024, the measure has not yet become fully operational, which will happen in May 2026. Until then, Regulation (EC) 1013/2006 remains in force.

27 -EuRIC, *Simplification of admin burden in environmental legislation - EU Recyclers Feedback. EuRIC's Response to the Call for Evidence*, 8 September 2025.

Given that, as already highlighted elsewhere, **the new provisions do not apply to End of Waste exports** [28] , the new Regulation, in addition to confirming the ban on the export of hazardous waste already provided for in current legislation, will impose restrictions on the export of non-hazardous waste (so-called "green list waste") to non-OECD countries from May 21, 2027.

In compliance with the provisions, the authorities of non-OECD countries that intend to continue importing waste from the EU after that date are required to notify the European Commission of their intention and demonstrate their ability to treat such waste in an environmentally sound manner, as provided for in Annexes VIII and IX to the Regulation.

So far, **a significant number of non-OECD countries that import recyclable waste from the EU complied with the Regulation by sending their requests to the European Commission by the first deadline**, which was set for February 21, 2025. These include: Bangladesh, Bosnia and Herzegovina, Egypt, El Salvador, India, Indonesia, Kazakhstan, Malaysia, Moldova, Monaco, Morocco, Nigeria, North Macedonia, Pakistan, the Philippines, Saudi Arabia, Serbia, Singapore, Taiwan, Thailand, Togo, Tunisia, Ukraine and Vietnam. Five countries, on the other hand, have not submitted any requests: Senegal, Brazil, Kuwait, the United Arab Emirates and Laos. The Commission has stated that it will still be possible for them to submit their applications, although there is no guarantee that the assessment of "late" applications will be completed before the first list of countries authorised to import waste from the EU is drawn up, which is expected to be adopted by November 21, 2026.

At the same time, in Italy, the examination of the **2025 European Delegation Bill** is continuing. Article 9 of this bill delegates the Government to adopt, within 12 months of the date of entry into force of the law, one or more legislative decrees - subject to the opinion of the Unified Conference - for the transposition of EU Regulation 2024/1157, binding the Government to comply with specific guidelines, including:

- provide for effective, dissuasive and proportionate administrative penalties for breaches of the obligations arising from the Regulation;
- introducing provisions derogating from the limits established by the relevant national legislation on penalties, including the possibility of providing for the criminal relevance of illegal shipments of waste. The penalties shall take into account, among other elements, the nature and seriousness of the violation, any economic benefits obtained and the environmental damage caused.

The Minister for EU Affairs and PNRR has expressed the hope that the parliamentary process will proceed swiftly and be completed by the end of February 2026.

28- note present on page 57

3.4 TARI

On May 9, 2025, the Council of Ministers approved, in preliminary examination, a draft Legislative Decree containing provisions on regional and local taxes, which was sent to the Finance Committees of the Chamber of Deputies and the Senate for their opinion (Government Act No. 276).

There are two points of specific interest to the sector: Article 28 (*"Changes to waste charges"*) and Article 29 ("*Changes to Article 238 of Legislative Decree 152 of 3 April 2006 on waste charges*"). These issues have been the subject of a UNIRIMA hearing in the Senate Finance and Treasury Committee on July 10.

On that occasion, the Association expressed its support for the amendments proposed in the draft decree, with particular reference to the elimination, in Law 147/2013, of the reference to "assimilated" waste, as well as the inclusion in the text of the opportunity for non-domestic users not to use the public service and obtain a total or partial reduction of the variable part of the TARI (waste tax) for waste sent for recovery or recycling by private companies.

The only dissenting element in this picture, as highlighted during the hearing, is the minimum two-year restriction on choosing between public service or the market. This specification, in addition to being in contrast with the rulings of the AGCM [29], represents an unjustified tightening of the rules since, in identifying the operator to be entrusted with the management of the waste produced, an economic activity should also be able to freely indicate the duration of the service, the specification of which should be entrusted solely to negotiation between the parties concerned.

Since it has been reiterated in various forums [30], that the new regulatory framework aims to align itself with recent developments in case law and interpretation, including following rulings by the Italian Competition and Market Authority (see note of September 7, 2023), it is hoped that the Government will also comply with the AGCM's proposal regarding the two-year limit.

29 - 30: note present on page 57

Note n. 28
The amendment to Article 29 ('Classification Issues') of the proposed Waste Shipment Regulation, introduced during the trialogue phase and inserting the criterion to distinguish between "goods" and "waste" defined a clear standard to determine when a material can be considered 'End of Waste', and therefore no longer a waste, linking it to Article 6 of Directive 2008/98/EC and therefore not subject to the scope of Regulation (EU) 2024/1157. On the other hand, it is already clear from the "whereas" of the Regulation that "it is important in this regard that the competent authorities base their decisions on the provisions laid down in Directive 2008/98/EC relating to the determination of by-products and the end of waste status". In other words, the new Regulation has enhanced the function of the End-of-Waste decrees issued at national level, regardless of the mutual recognition of an EoW material even in the different country of dispatch/destination.
Note n. 29
In the communication sent to the Prime Minister regarding 'Proposals for competition reform, for the purposes of the Annual Law on the Market and Competition for 2021', in the paragraph concerning 'The role of competition in promoting a circular economy in the waste sector', the Authority - in order to promote greater competition in the waste management chain with a view to facilitating the pursuit of the objectives resulting from the spread of the circular economy - proposed the elimination of the time limit. The Annual Law on the Market and Competition 2021 (Law 118 of 5 August 2022), with Article 14 ("Waste management services"), partially incorporated the AGCM's recommendation, reducing the duration of the choice of services by the public service operator or recourse to the market to two years.
Note n. 30
Please see the Illustrative Report.

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4. BUREAUCRACY? A BRAKE ON THE CIRCULAR ECONOMY

The road of Italian recycling companies is littered with bureaucratic obstacles. Authorisations, procedures, regulations and tax compliance requirements slow down processes and increase costs, while also reducing the resources available for innovation, training and investment.

Quantifying the costs of bureaucracy for waste treatment companies is not easy, since there are many variables involved. However, industry analysts agree that the burden is quite significant and that the cost for the sector mainly consists of:

- **direct compliance costs**, such as authorisations, permits, reporting and management systems;
- **operating and human resource costs**: companies devote resources and time to managing bureaucratic requirements, amounting to hundreds of working hours per year;
- **charges related to waste management**: sector regulations require a detailed and complex system of documentation to be produced (forms, loading and unloading registers, MUD), in addition to requests for data (often the same) from various control bodies and public authorities;
- **delays** in obtaining the renewal of authorisations for waste management facilities or for the construction of new sites. These delays can last for years, slowing down investment and hindering the growth of the sector;
- **regulatory uncertainty**: the complexity and evolution of the regulatory framework create uncertainty for companies, which are forced to continuously update and adapt to new provisions.

In addition to all this, there are **hidden costs** generated by bureaucratic inefficiencies. The time needed to obtain authorisations or resolve administrative issues slows down the development of recycling companies.

4.1 THE 2025 SURVEY OF THE UNIRIMA CENTRO STUDI

A recent **survey conducted by the UNIRIMA Centro Studi** confirmed the extent of the problem, providing a detailed picture of the economic and operational impact of bureaucratic requirements on companies in the sector. The research involved administering a questionnaire to a sample of associated companies.

The results did not leave any room for doubt: **bureaucracy represents a significant economic cost. In addition, it requires a considerable investment in terms of time and human resources**, thus slowing down business operations.

Unfortunately, the bureaucratic burden shows no sign of decreasing, as can also be seen from the survey, which clearly shows that over 90% of the surveyed companies believe that this burden increased in the **three-year period 2022 - 2024**, with approximately 46% of the sample considering this increase significant and 47.8% considering it moderate:

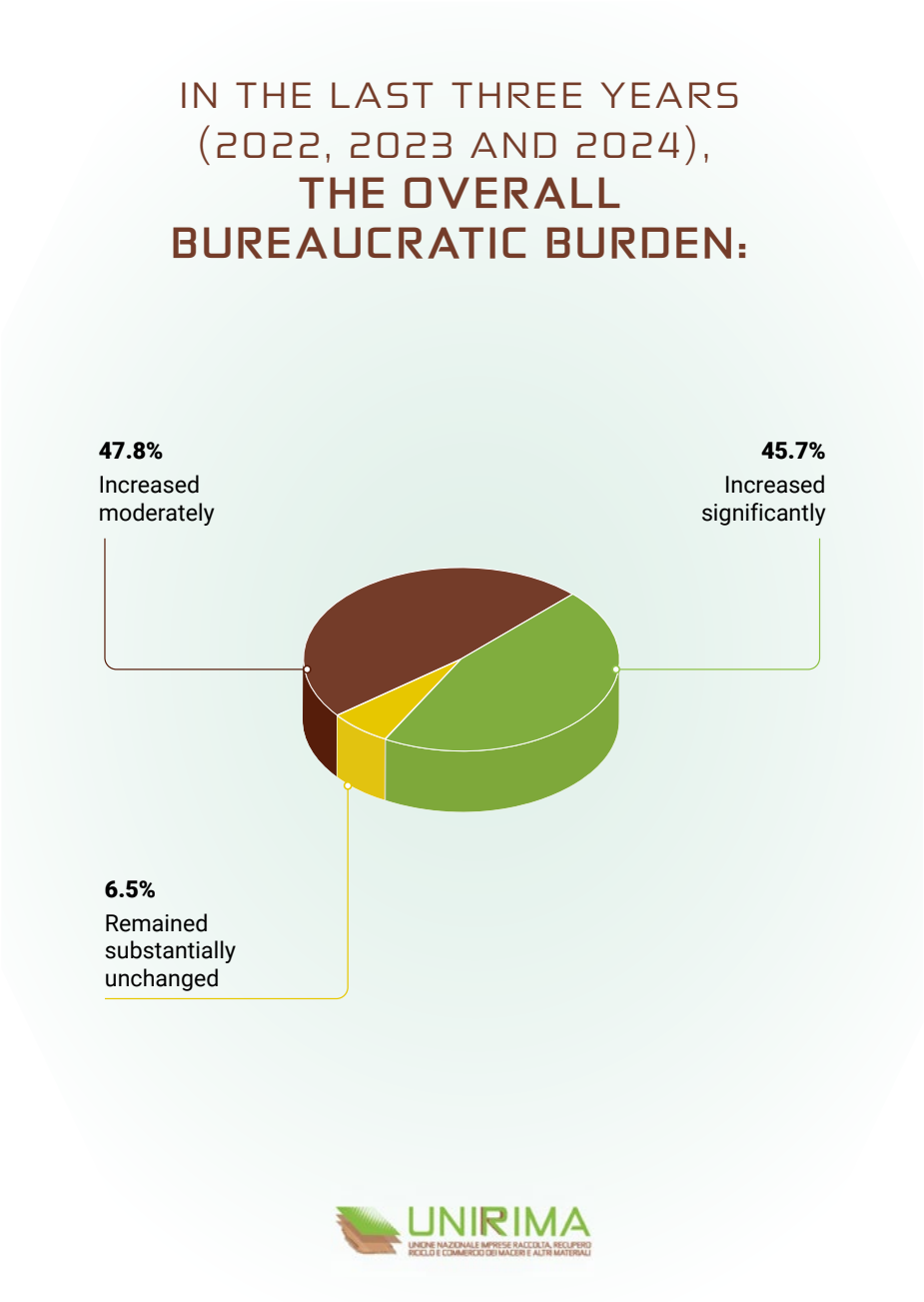

FIGURE 34: PERCEIVED BUREAUCRATIC BURDEN IN 2022, 2023 and 2024

According to 45.7% of the companies in the sample, a portion of between 5 and 10% of their annual turnover is spent on bureaucratic fulfillments. Approximately 22% of the companies involved in the survey stated that this figure exceeds 15%. Only 15.2% of companies reported an incidence of less than 5%.

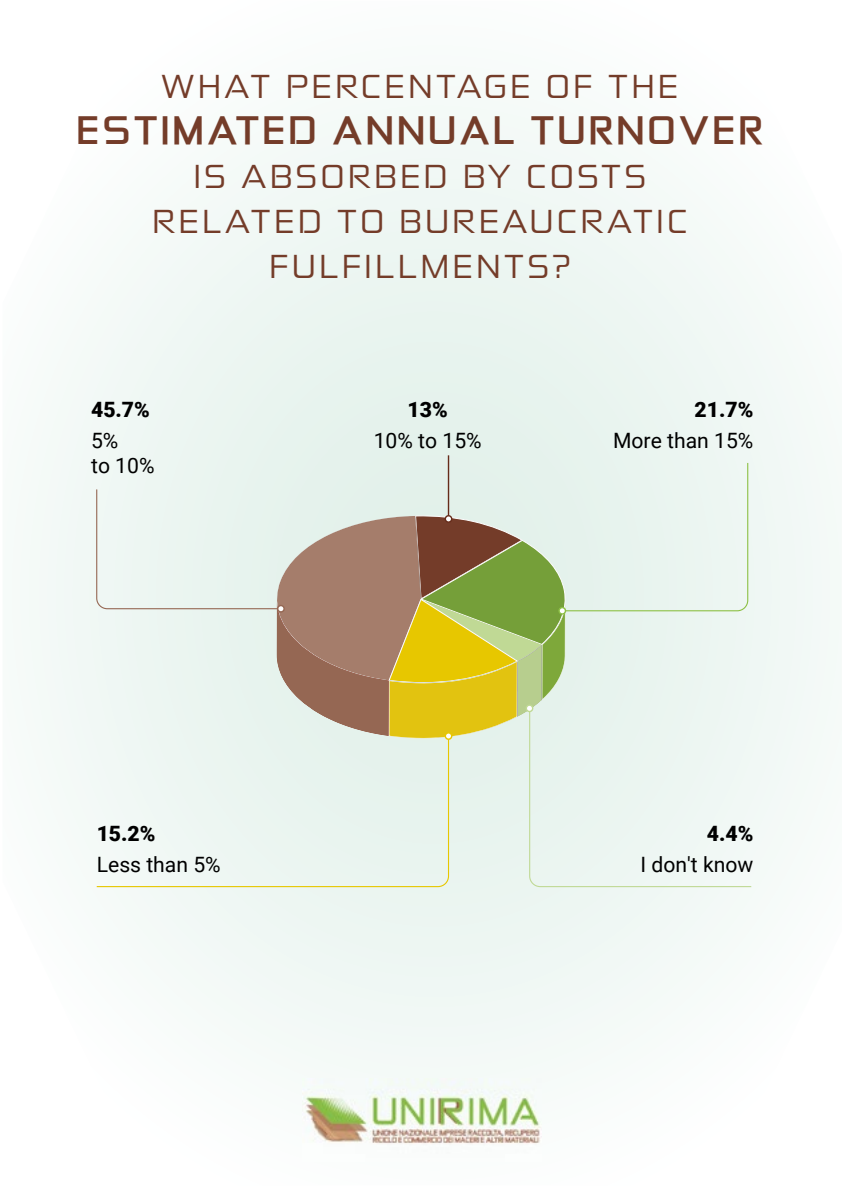

FIGURE 35: PERCENTAGE OF THE ESTIMATED ANNUAL TURNOVER ABSORBED BY COSTS RELATED TO BUREAUCRATIC FULFILLMENTS

Managing bureaucracy also affects the allocation of human resources. 43.5% of companies devote between 11% and 20% of their staff (including external consultants) to managing bureaucratic requirements, while for 17.4% the percentage is between 21% and 40%. This represents a considerable expenditure of internal energy that could otherwise be used for productive and development activities.

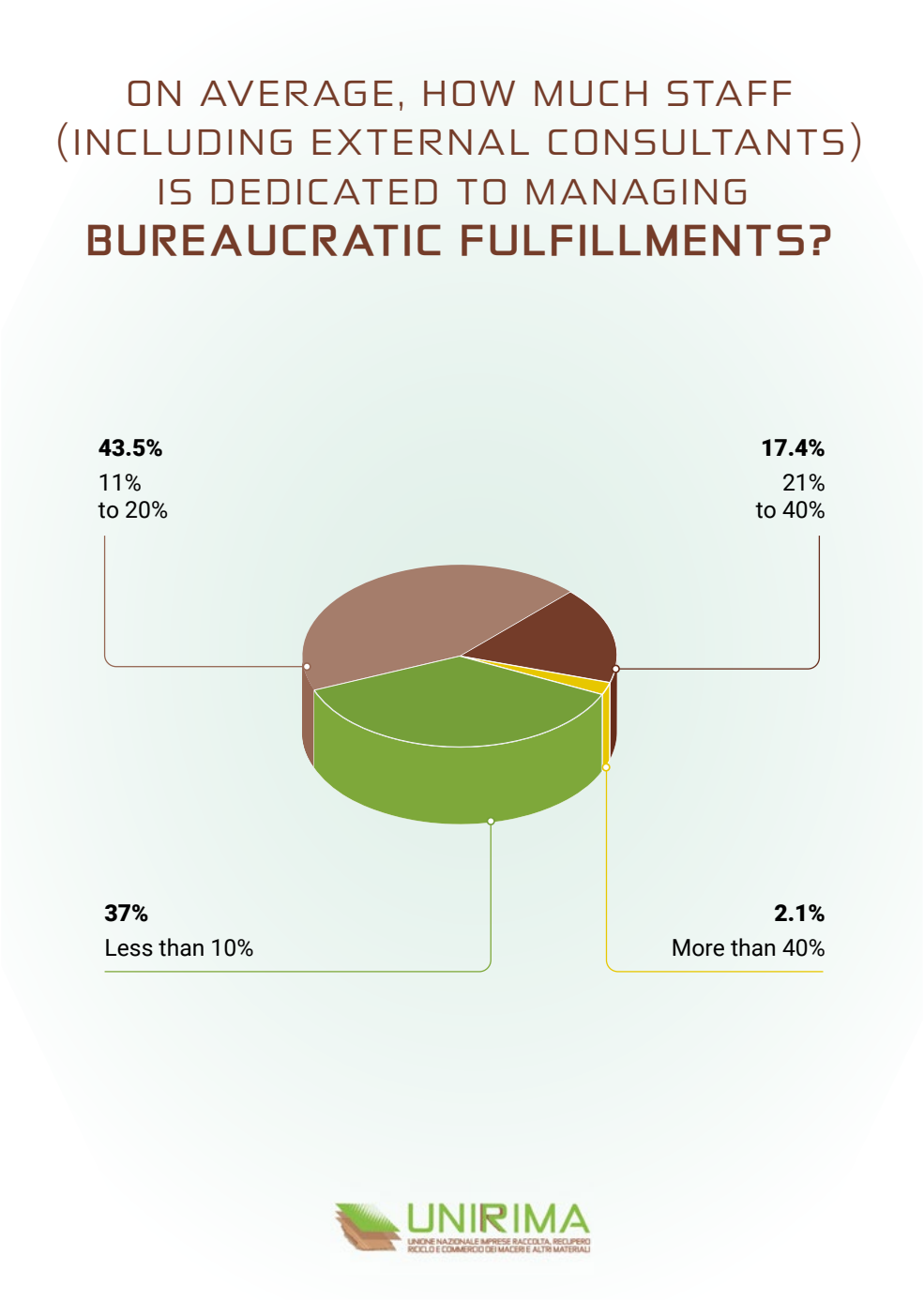

FIGURE 36: STAFF DEDICATED TO MANAGING BUREAUCRATIC FULFILLMENTS

Among the areas entailing the greatest bureaucratic burden, the category of 'Environmental obligations (authorisations, unified environmental declarations, quality and environmental management systems, Rentri, etc.)' is the most prominent, being indicated by 52.2% of respondents. This is followed by 'Fiscal and Tax obligations (26.1%) and 'Human resources management and occupational safety' (17.4%).

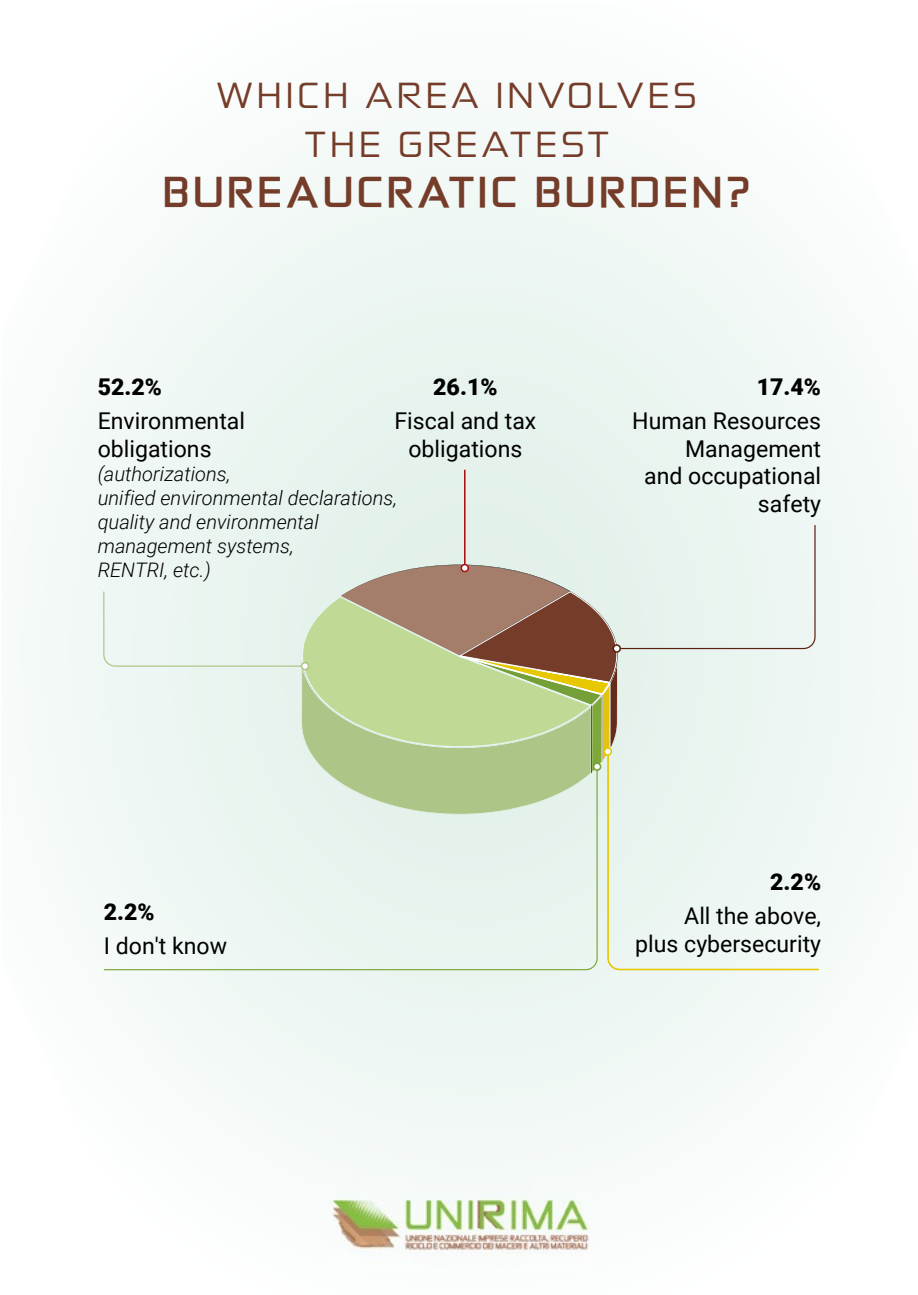

FIGURE 37: AREA INVOLVING THE GREATEST BUREAUCRATIC BURDEN

The comments and remarks collected alongside the questionnaire are also interesting, offering an in-depth insight into the difficulties faced by companies. They report **significant waiting times, considerable difficulties related to the interpretation of regulations at regional and municipal level, and problems related to the duplication of data on different platforms**. Another critical issue is the management of procedures that involve multiple stages or require a combination of online and email submissions. In these cases, the complexity of the software, the difficulty in obtai-

ning information from administrators and the uncertainty surrounding the identification of the relevant offices all contribute to increasing the perceived bureaucratic burden. There is also a widespread feeling, confirmed by various comments by interviewees, **that it is not so much the economic burden that weighs on business management as the investment of time and the uncertainty generated by regulations that are often scattered and difficult to interpret**. In fact, bureaucracy not only entails a material cost, but also a significant expenditure in terms of time and energy, and is potentially capable of acting as a paralysing factor in terms of the efficiency and daily operations of businesses.

4.2 A COMPLEX PROBLEM

The cost of bureaucracy in the industrial waste treatment sector is a combination of administrative burdens and indirect costs linked to inefficiencies, delays, regulatory uncertainties and document management. The problem is not only economic, but also organisational and procedural: non-integrated platforms, procedures managed in multiple stages and across different channels (online, certified email, paper), issues with the software to be used, difficulty in finding information, and uncertainty in identifying the competent authority. All this generates delays, inefficiencies and a widespread sense of frustration, which companies indicate as one of the main obstacles to their daily operations. In fact, UNIRIMA data clearly highlights how this burden affects not only companies' margins, but also their ability to **innovate, invest and grow.**

4.3 TOWARDS SIMPLIFICATION?

Being aware of how much bureaucracy can slow down the competitiveness of businesses, a simplification effort is underway in Europe. At the end of May 2025, in the context of the European Commission's Communication on the Single Market Strategy, **actions and priorities were outlined to strengthen the expansion of small and medium-sized enterprises** by promoting simplification and reducing administrative burdens.

More specifically, the Commission launched an initiative to **simplify and streamline administrative requirements related to environmental legislation in sectors involving the circular economy, industrial emissions and waste management**. The objective of achieving a 25-35% reduction in administrative costs is particularly significant. Other significant goals include harmonising provisions and streamlining reporting requirements.

For its part, EuRIC, the European Confederation of Recycling Industries, to which UNIRIMA belongs, has sent to the Commission specific requests for

the streamlining and acceleration of authorisation procedures, and for more digitised and functional processes. However, the road to real simplification still seems long.

4.4 RELEASING RESOURCES AND COMPETITIVENESS

For a country that strives to be a leader in ecological transition, **simplifying the regulatory framework and digitising administrative processes** is no longer a choice but a strategic priority.

A structural intervention is needed, in order to reduce duplication of compliance requirements, harmonise regulations (including regional ones), ensuring **clarity, certainty of timing and efficient digital tools**.

Only in this way the mechanical recycling sector, and in particular that of paper from recycling - already among the most virtuous in Europe - will be able to fully express its potential, contributing decisively to a truly circular, sustainable and competitive economy.

5. SCENARIOS AND PREDICTIONS [31]

The Italian sector of paper from recycling and recoverable materials operates in a rapidly changing global context, characterised by complex macroeconomic dynamics and profound structural transformations. The digital and ecological transition is reshaping challenges and opportunities, asking companies to be agile and adaptable to work in a global economic framework that's slowing down a lot, mainly because of more trade barriers and widespread political uncertainty.

Forecasts indicate a decline in global GDP growth to 2.3% in 2025, down from 2.8% in 2024, with stabilisation around 2.5% in 2026-2027.

Projections for Eurozone GDP indicate moderate growth, reflecting global challenges and internal dynamics.

The ECB's forecasts, based on the assumption that US tariffs on EU goods would be raised to 10%, predicted GDP growth of 0.9% in 2025, 1.3% in 2026 and 1.7% in 2027 [32]. However, the agreement reached between the US and the European Union to introduce a 15% tariff on European goods from August 1, 2025 significantly altered this scenario. The impact of this measure, which is greater than the ECB's initial forecasts, could lead to a decline of up to 0.5 percentage points of GDP in 2026, reducing the expected growth.

Economic dynamics will still be influenced by several factors: the anticipation of exports in view of the increase in tariffs in the short term and the new budgetary measures recently announced by the EU Commission in the medium term. This growth, although further contained compared to the original forecasts, remains crucial for regional economic stability and will influence the performance of individual Member States.

The increase in tariffs imposed by the US administration, combined with uncertainty over trade policies, is negatively affecting the global economic outlook. Global trade growth is expected to slow to 3.1% in 2025 and 1.7% in 2026, before a subsequent recovering. This sharp slowdown is due both to the exhaustion of export anticipation and to the direct impact of tariffs and uncertainty, which are pushing global demand towards less intense trade.

The appreciation of the euro against the US dollar, with an exchange rate forecast of 1.11 in 2025 and 1.13 in 2026, has a twofold effect. While it

31 - The market forecasts in this paragraph are based on data and analyses deemed reliable at the time of writing. However, these forecasts are subject to variables and uncertainties typical of economic and financial contexts and cannot be guaranteed in terms of future outcomes. UNIRIMA therefore declines all responsibility for any decisions, actions or losses arising from the use or interpretation of these forecasts.

32 -European Central Bank, Macroeconomic projections (June 2025).

penalises exports by making them less competitive on international markets, it partially mitigates this disadvantage by reducing production costs linked to imports of raw materials, mainly energy and industrial materials traded in dollars.

Energy commodity prices are under downward pressure and are expected to be significantly lower in 2025-2026. This will help to moderate overall inflation in the euro area, which is expected to stand at 2.0% in 2025 and 1.6% in 2026, before rising to 2.0% in 2027. Energy prices, in particular, will remain negative until the end of 2026.

The projections for the Italian economy indicate GDP growth of 0.5% in 2025 and 0.8% in 2026. This growth will be entirely driven by domestic demand (net of inventories, +0.8% in 2025 and +0.9% in 2026), while net foreign demand will make a negative contribution in both years (-0.2% and -0.1%). HICP inflation in May 2025 was in line with the Eurozone average and is expected to remain consistent with the Central Bank's targets, benefiting from the slowdown in the energy component and the appreciation of the euro.

5.1 KEY MACRO TRENDS AFFECTING THE SECTOR

The Italian sector for the recovery of materials from waste is undergoing a dual transition: digital and ecological.

With regard to the former, particularly in the paper recycling sector, while the expansion of e-commerce is driving significant growth in **demand for cardboard and paper boxes and packaging**, progressive digitalisation continues to **reduce the use of printing paper**. In general, adequate measures are also needed to encourage the use of recycled materials over virgin raw materials.

From an ecological transition perspective, the Italian paper from recycling sector is considered to be at the cutting edge in Europe. With a circularity rate of 18.7%, well above the European average of 11.5%, **Italy** is a leader in Europe in terms of the circular economy. The recycling targets for paper and cardboard packaging set by the European Union for 2025 (75%) and 2030 (85%) have been exceeded well in advance, and since 2023, recycling has even exceeded 90%.

Companies investing in innovation record a turnover growth rate that is 1 percentage point higher than those that do not innovate [33]. However, although the paper from recycling sector shows potential for transformation, this is currently limited by a lack of financial resources to invest in innovation [34]. **For small and medium-sized enterprises, access to finan-**

33 - Ibidem.
34 - Data from the Guglielmo Tagliacarne Chamber of Commerce Research Centre (2024).

cial resources for investment in innovation therefore remains a critical factor, limiting the ability of circular economy businesses to generate benefits for the country's economic system in terms of productivity, competitiveness, energy efficiency and environmental sustainability.

5.2 PREDICTIONS FOR THE ITALIAN SECTOR OF PAPER FROM RECYCLING

The analysis was conducted using an integrated methodological approach based on three complementary pillars:

1. **Time series analysis (2007-2024)**: the historical series was examined to identify long-term trends, cyclicality and volatility. The analysis highlighted growing instability in the post-pandemic period (2020-2024), with fluctuations greater than the historical average, making purely extrapolative models less reliable. This made it necessary to give greater weight to recent exogenous factors;
2. **Econometric model**: the correlation between paper from recycling export volumes and key macroeconomic variables was estimated. The key variables considered were Eurozone GDP growth projections, world trade trends and the EUR/USD exchange rate. Forecasts for these variables, provided by the World Bank and the ECB, were used as inputs for the model;
3. **Qualitative assessment**: the quantitative results were adjusted through a qualitative assessment of factors that could not be fully modelled:
   - **impact of tariffs**: the combined effect of tariffs already in force (10%) and the new scenario with tariffs at 15% was considered, assessing their impact on competitiveness and the potential deviation of trade flows;
   - **geopolitical conflicts**: the uncertainty arising from the conflicts in Ukraine and the Middle East was incorporated as an upward risk factor on logistics and energy costs;
   - **sector macro-trends**: the dual effect of the digital transition (decline in printing paper, increase in packaging for e-commerce) and the ecological transition (competitive advantage for Italy as a leader in the circular economy) was weighted.

Based on these factors, three scenarios have been developed for Italian paper from recycling exports for the three-year period 2025-2027 (figure 38):

▶ **DOWNSIDE SCENARIO (-6,68% ANNUAL AVERAGE)**

The economic reaction to tariffs is worse than expected. Confidence plummets, triggering a deeper recession and geopolitical uncertainty that exacerbates costs.

- ▶ 2025: global confidence crisis (-11.0%). Customers not only renego-

tiate but cancel orders on a large scale, fearing an imminent recession. The decline is deeper than the purely mathematical one linked to tariffs;

- 2026: the Eurozone enters a full-blown recession (-7.0%), with a worse-than-expected impact on GDP. Demand for industrial goods plummets. Geopolitical conflicts also cause spikes in energy costs, eroding margins and forcing some companies to reduce production;
- 2027: no recovery (-1.5%). The economy remains stagnant and the sector continues to lose ground due to structurally compromised competitiveness. Market weakness prevents any form of recovery;

- **BASELINE SCENARIO (-3.76% ANNUAL AVERAGE)**

The economy reacts as expected by the main institutions (ECB, World Bank). The impact of tariffs is gradually absorbed, with a significant cost in terms of volumes.

- 2025: initial and inevitable shock (-8.0%) due to a 15% loss in price competitiveness. Volumes contract sharply as customers renegotiate contracts or turn to alternative suppliers;
- 2026: contraction continues, although at a slower pace (-5.0%) as the problem shifts from price to general market weakness. The slowdown in European GDP, induced by trade tensions, depresses aggregate industrial demand;
- 2027: beginning of stabilisation (+2.0%). The market has found a new equilibrium at a lower level. Businesses have adapted, the European economy is showing a weak recovery and volumes are beginning to rise from the low point reached in 2026;

- **UPSIDE SCENARIO (-0.72% ANNUAL AVERAGE)**

The global economy proves to be more resilient. Italian companies react quickly and effectively, diversifying markets and optimising costs.

- 2025: the impact of tariffs is partially mitigated (-4.5%). Companies quickly manage to divert flows to emerging markets not subject to tariffs. A slightly weaker euro and strong global demand in other sectors help to absorb part of the shock;
- 2026: the market reaches its lowest point very quickly (-1.0%). The adjustment is almost complete and the negative impact on European GDP is marginal. Demand stabilises almost immediately, thanks to resilient consumption and investment;
- 2027: a solid recovery begins (+3.5%). Companies, having become more efficient and diversified, are well positioned to capitalise

on global growth. Leadership in sustainability becomes a key competitive advantage for winning back customers in high-value segments.

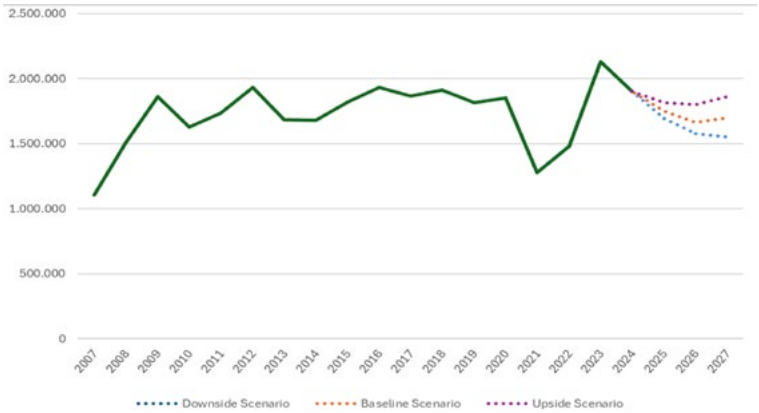

FIGURE 38: TREND IN PAPER FROM RECYCLING EXPORTS, 2007-2024 AND FORECASTS FOR 2025-2027, ITALY
Source: UNIRIMA forecasts [35]

The sector could benefit from Italy's leadership in the circular economy, but it will have to face the challenges of the global trade slowdown and geopolitical uncertainty. The rise of e-commerce and the increased use of cellulose packaging to replace other materials may be the main positive driver for their growth, but in order to counteract weak demand for recycled materials, incentives must be provided to make them more competitive compared to virgin raw materials. With regard to geopolitical uncertainties, the issue is more complex, but Italian companies operating in the paper from recycling sector must certainly continue to diversify their export destinations.

35 -The limitations of the analysis underlying the forecasts are directly linked to: a) Post-pandemic volatility (the years 2020-2024 present statistical anomalies that reduce the reliability of projections); b) Geopolitical uncertainty (difficulty in quantifying the prolonged impact of ongoing conflicts); c) External shocks (so-called black swan events such as new pandemics or widespread conflicts have not been taken into account).

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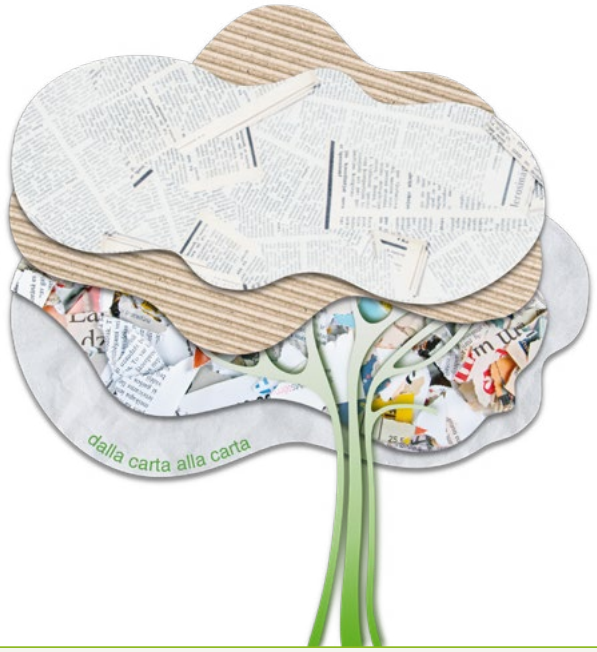

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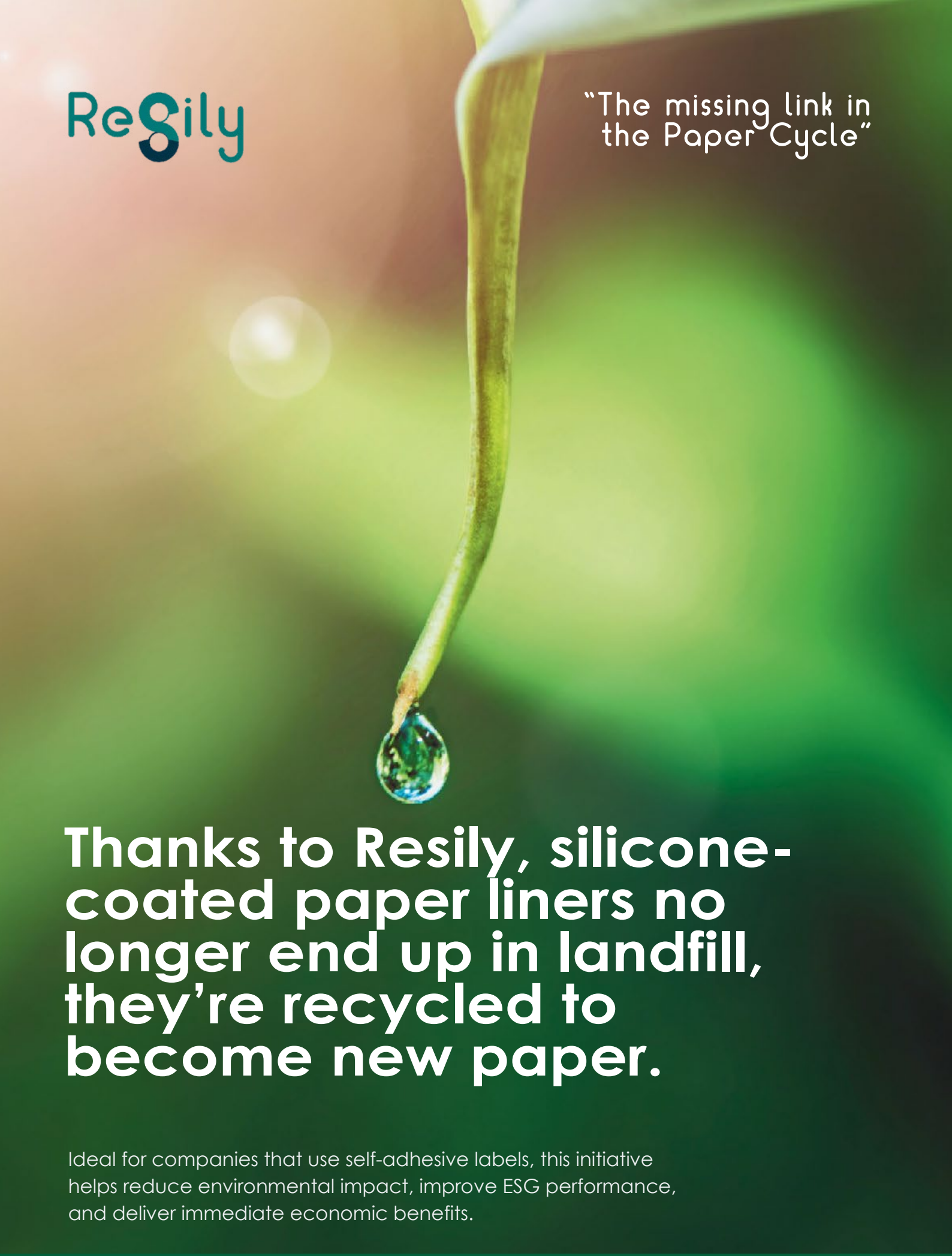
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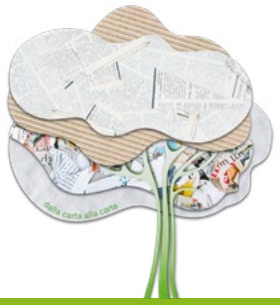

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