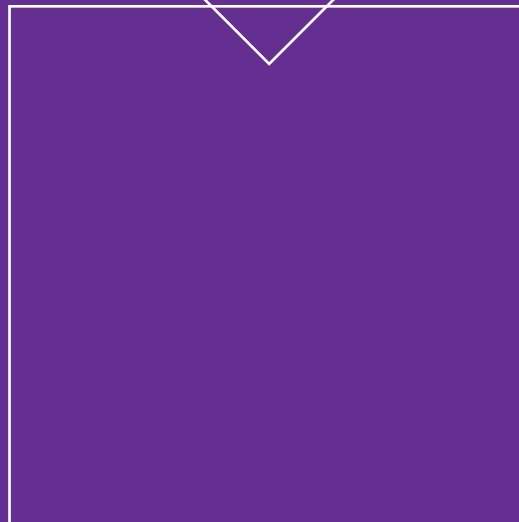
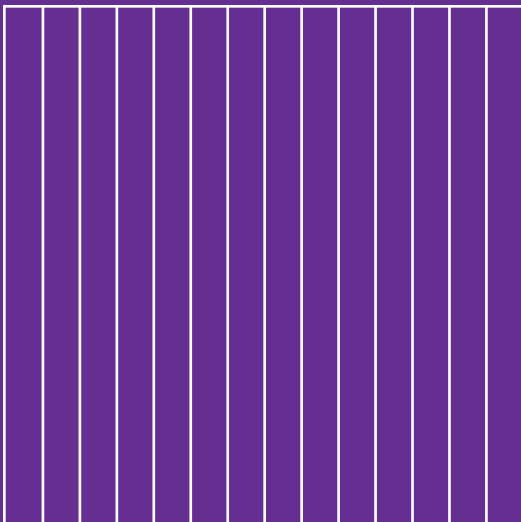
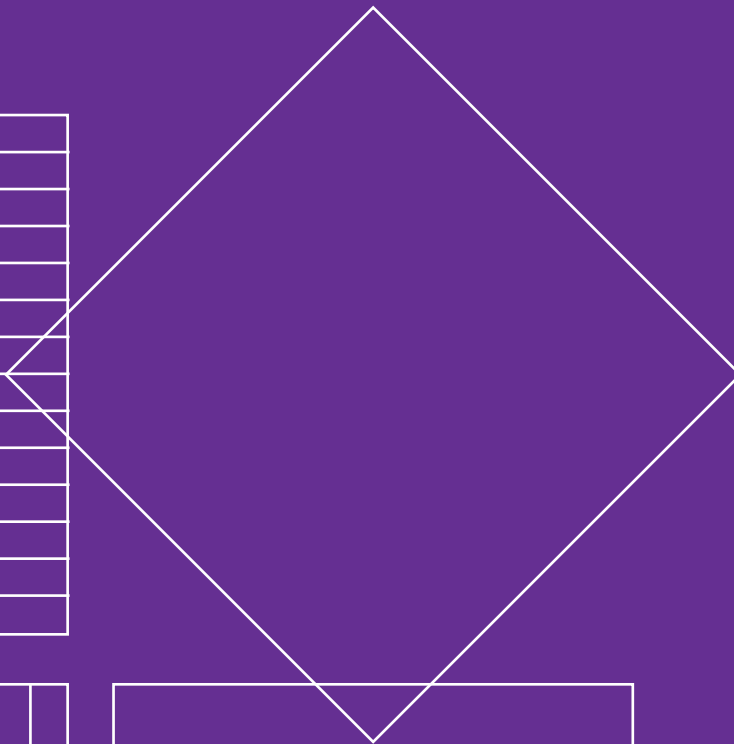
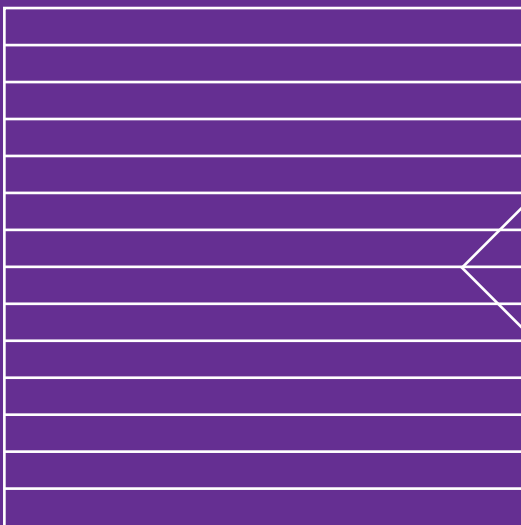


Where we stand: Kosovo's Green Agenda Progress Review

Kosovo Green Action



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Acronyms

ADA	Austrian Development Agency
BGF	Balkan Green Foundation
BioNet	Biodiversity Network
CBAM	Carbon Border Adjustment Mechanism
DENA	German Energy Agency
EBRD	European Bank for Reconstruction and Development
EE	Energy Efficiency
EIB	European Investment Bank
ETS	EU Emissions Trading System
EU	The European Union
EGD	European Green Deal
EIP	Economic and Investment Plan
ENTSO-E	European Network of Transmission System Operators for Electricity
ERO	Energy Regulatory Office
FAO	Food and Agriculture Organization of the United Nations
FOL	Lëvizja Fol
GDP	Gross Domestic Product
GET	German Economic Team
GHG	Greenhouse Gases
GVA	Gross Value Added
Gwh	Gigawatt hours
IUCN	International Union for Conservation of Nature
KAS	Kosovo Statistical Agency
KCSF	Kosovar Civil Society Foundation
KEPA	Kosovo Environmental Protection Agency
KEEF	Kosovo Energy Efficiency Fund
KGA	Kosovo Green Action
KOSTT	Electricity Transmission, System and Market Operator of Kosovo
MCA	Millennium Challenge Account
ME	Ministry of Economy
MESPI	Ministry of Environment, Spatial Planning and Infrastructure
MMTS	Multimodal Transport Strategy
MRV	Monitoring, reporting and verification
MW	Megawatt
NDC	Nationally Determined Contributions
NECP	National Energy and Climate Plan
ODK	Open Data Kosovo
RES	Renewable Energy Sources
TPP	Thermal Power Plant
UN	United Nations

Executive Summary

This report builds on the initial Needs Assessment to critically evaluate Kosovo's progress in implementing the Green Agenda for the Western Balkans. Kosovo stands at a critical juncture in its green transition. This report identifies systemic gaps, institutional challenges, and opportunities for advancement across priority areas such as energy transition, climate adaptation, biodiversity protection, and waste management. The analysis aims to enhance the effectiveness of the Green Agenda as a strategic framework for sustainable development and environmental alignment with EU objectives. Kosovo has made some strides in developing a legislative and strategic framework, including the adoption of the Energy Strategy 2022–2031, the Climate Change Strategy 2019–2028, the Law on Climate Change (2024), and the draft National Energy and Climate Plan (NECP). However, implementation is hindered by structural inefficiencies, limited financial resources, and fragmented institutional coordination. Despite modest progress in renewable energy deployment, the country remains highly dependent on lignite, which poses a significant barrier to decarbonization.

Key Findings

- **Renewable Energy Progress:** Kosovo launched its first wind energy auction (100 MW), representing a shift toward a more diversified energy portfolio.
- **Climate Commitments:** The country submitted its first voluntary Nationally Determined Contributions (NDC), outlining mitigation and adaptation targets through 2030.
- **Transport Modernization:** With €38 million in EIB financing, Kosovo began rehabilitating 148 km of key regional rail infrastructure.¹
- **Low Carbon Border Adjustment Mechanism (CBAM) Exposure:** While exports to the EU represent only ~1% of GDP, carbon-intensive sectors (steel, aluminum, electricity) will face growing CBAM-related costs.

- **Early-Stage Green Financing:** Green budgeting and financing mechanisms remain underdeveloped and are not yet systematically integrated into government planning.
- **Waste and Recycling:** Recycling rates remain extremely low (2.5%), reflecting weak enforcement and infrastructure for sustainable waste management.²
- **Energy Poverty:** The absence of a legal definition of energy poverty hampers targeted support for vulnerable households.
- **Public Engagement:** Awareness and participation from civil society and the private sector remain limited, weakening the foundation for inclusive environmental governance.
- **Agricultural Digitalization:** The FAO-supported Digital Agriculture Programme aims to foster innovation and resilience in the agricultural sector.
- **Inclusive Growth Gaps:** Marginalized groups – including smallholder farmers and women – are insufficiently integrated into sustainability initiatives and market systems.³
- **Biodiversity at Risk:** Natural ecosystems face mounting pressure from development and regulatory gaps, necessitating more robust conservation efforts.

Strategic Priorities

To accelerate Kosovo's transition to a green and sustainable economy, the following actions are critical:

- Enforce existing environmental laws with stronger oversight and accountability.
- Establish dedicated funding mechanisms for green infrastructure and renewable energy.
- Improve coordination across ministries and strengthen technical capacity.
- Support public-private partnerships that align with sustainability goals.
- Attract climate-aligned investment by creating predictable and transparent policy conditions.

1 European Investment Bank. Source: <https://www.eib.org/en/press/all/2023-051-team-europe-eib-global-support-for-railway-network-modernisation-in-kosovo-reaches-eur80-million>

2 Koha.net. 2025. /Source: <https://www.koha.net/en/arberi/ekspertet-e-mjedisit-kritikojne-institucionet-per-moskonsolidim-te-sistemit-per-riciklim-te-mbeturinave>

3 Swisscontact. 2025. Source: Enhancing Agricultural Market Systems in Kosovo.

This report examines Kosovo's progress in implementing the Green Agenda for the Western Balkans, with a focus on aligning national policies with EU environmental standards. It is produced under the Kosovo Green Action Project, which aims to enhance access to environmental and energy data through a digital platform and foster evidence-based policymaking.

The initiative, led by the Balkan Green Foundation in partnership with Open Data Kosovo and Lëvizja FOL, engages public institutions, civil society, and the private sector in addressing structural barriers to sustainability. Through its participatory mechanisms – particularly the Green Forum – the project gathers critical feedback on policy implementation and accountability.

While Kosovo has developed key frameworks such as the Energy Strategy 2022–2031, the Climate Change Strategy 2019–2028, and the 2024 Law on Climate Change, implementation lags due to limited institutional coordination, inadequate enforcement, and financial constraints. The NECP remains pending, while strategies for decarbonization and climate adaptation are under development.

Regulatory alignment with EU standards in waste, air quality, and transport remains incomplete. Existing strategies signal policy intent but lack the operational backing to deliver impact. This report offers a critical analysis of these gaps and outlines actionable recommendations to support a more coherent and accountable green transition.

This report applies a qualitative, policy-focused methodology combining document analysis with stakeholder consultation to evaluate Kosovo's implementation of the Green Agenda for the Western Balkans.

Desk Research

Key national strategies, laws, and action plans were reviewed to assess policy alignment with the Green Agenda's five pillars and EU environmental standards. These included the Energy Strategy 2022–2031, Climate Change Law (2024), Water Strategy 2022–2030, and sectoral strategies in agriculture, transport, waste, and biodiversity.

The review focused on coherence, implementation status, target setting, and regulatory completeness.

Stakeholder Engagement

To complement the policy review, consultations were held with representatives from government institutions (e.g., Ministry of Economy, KEPA, ERO), civil society (EcoZ, Association of Kosovo Municipalities), the private sector (SunVolta Energy), and development partners (EU Office).

These discussions identified institutional gaps, coordination issues, and barriers to enforcement, offering critical perspectives not captured in official documentation.

Analytical Focus

Findings were assessed across four dimensions:

- Policy coherence and readiness
- Institutional capacity and coordination
- Financial mechanisms for implementation
- Inclusivity and stakeholder engagement

Overview of the Green Agenda

The Green Agenda for the Western Balkans aligns with the European Green Deal and focuses on:

- I. Decarbonization
- II. Circular economy
- III. Depollution
- IV. Sustainable food systems
- V. Biodiversity protection

Kosovo has taken initial steps towards these goals through policy reforms and strategic investments. Several national strategies and legislative measures reflect Kosovo's commitment to aligning with the Green Agenda. Notably, the Climate Change Strategy 2019–2028 outlines both mitigation and adaptation actions aimed at reducing greenhouse gas emissions. Despite these efforts, important challenges persist, including delays in the approval of the NECP and gaps in the implementation of the Circular Economy Roadmap, both of which are critical to Kosovo's sustainability transition.

A significant milestone in Kosovo's environmental legislation is the adoption of the Law on Climate Change (Law No. 08/L-250) in January 2024.⁴ This law represents a major advancement in aligning with international climate obligations and establishing a framework for environmental protection. It outlines a system for monitoring, reporting, and verification (MRV), based on a bottom-up approach, in which operators monitor data, which is then reported to the government and the Kosovo Environmental Protection Agency (KEPA). Among the five key documents envisaged under this law in the long-term strategy for decarbonization. In addition, the law mandates the establishment of a National Council for Climate and a Scientific Advisory Board. The national council for climate change has already been established and is expected to play a crucial

role in coordinating climate policy across sectors

An important provision of the law refers to the CBAM. CBAM is designed to level the playing field between European producers, who are required to purchase emission allowances under the EU Emissions Trading System (ETS), and non-European competitors. It will eventually replace free allocation as the primary instrument for preventing carbon leakage. Kosovo is likely to be less affected by CBAM. According to the World Bank's Relative CBAM Exposure Index, Kosovo might even gain a competitive edge in comparison to the average EU producer of the goods it exports. This is largely due to the limited scale of Kosovo's exports to the EU, which account for only about 1 % of its GDP⁵.

Even so, the total financial impact of CBAM on Kosovo by 2034 is projected at €93 million⁶: Key sectors expected to be affected include Iron and steel, aluminum, and electricity. Within the manufacturing sector alone, CBAM related costs could reach €36 million by 2034.

Despite recent efforts to reform its waste management sector, Kosovo continues to face substantial challenges that undermine effective implementation. The adoption of the Law on Waste in 2022 marked a formal step forward; however, enforcement remains largely ineffective due to persistent financial limitations, insufficient technical capacity, and fragmented institutional coordination. These structural constraints not only delay progress but also expose a deeper disconnect between policy formulation and practical execution. Nevertheless, some incremental advances signal potential for systemic improvement, including the rollout of an online waste management monitoring system with 20 performance indicators, the drafting of the National Construction and Demolition Waste

⁴ <https://balkangreenenergynews.com/kosovo-adopts-first-law-on-climate-change/>

⁵ Deutsche Energie-Agentur (DENA). Challenges and Opportunities of the EU Carbon Border Adjustment Mechanism (CBAM) for the Western Balkan Countries.

⁶ German Economic Team (GET). 2024. CBAM and Kosovo: Economic implications and potential exemption for electricity exports to EU.

Management Plan, and the adoption of the Integrated Waste Management Strategy (2024–2035) alongside its Action Plan (2024–2026). While these initiatives demonstrate a strategic vision, their transformative potential will depend on sustained investment, cross-sectoral alignment, and robust accountability mechanisms to close the gap between legislative ambition and ground-level realities.

Additionally, Kosovo continues to face major environmental issues, particularly air and water pollution. The country has limited wastewater treatment infrastructure and a high dependence on lignite for electricity generation, which contributes significantly to CO₂ emissions.

Progress

- *Adoption of the Law on Climate Change* (Law No. 08/L-250) in January 2024, which introduces comprehensive climate governance structures and robust monitoring mechanisms.
- *Establishment of the National Council for Climate Change*, tasked with coordinating climate-related policies and actions.
- *Initiation of the drafting process of the long-term Strategy for Decarbonization*, one of the five key strategic documents envisioned under the Climate Law.
- *Advancements in Waste Management*, including adoption of the Law on Waste (2022); Implementation of the Integrated Waste Management Strategy (2024–2035), Development of the online waste management system with 20 performance indicators.

Gaps and Issues

- *Delays in the approval* of the National Energy and Climate Plan, a key instrument for achieving decarbonization and energy transition goals.
- *Limited implementation* of the Circular Economy Roadmap, hindering progress towards a resource-efficient economy.
- *Weak enforcement* of waste management legislation, stemming from financial,

technical, and institutional constraints.

- *Ongoing air and water pollution*, with limited wastewater treatment infrastructure and high reliance on lignite for electricity generation.
- *Limited technical and institutional capacity* in relevant authorities to effectively implement climate, waste, and biodiversity measures.

BGF Recommendations

1. Accelerate the approval and operationalization of the National Energy and Climate Plan, ensuring it is fully aligned with Green Agenda and EU targets.
2. Strengthen waste management laws by increasing budget allocations, building technical expertise, and enhancing monitoring mechanisms at both local and national levels.
3. Develop and implement a detailed, cost action plan for the Circular Economy Roadmap, with clear milestones, engagement of the private sector, and public outreach initiatives.
4. Invest in renewable energy sources (RES) and improve energy efficiency measures, gradually reducing reliance on lignite and cutting CO₂ emissions.
5. Improve administrative capacities for MRV systems, supporting effective implementation of the Law on Climate Change.
6. Support companies in preparing for CBAM compliance by offering technical assistance, tailored training, and facilitating access to greener technologies, especially in sectors like steel, aluminum, and electricity.

Key issues, gaps and potential improvements

4

While Kosovo has made steps in aligning its policies with the Green Agenda for the Western Balkans, several critical challenges remain across key sectors. Structural barriers, limited financial resources, weak enforcement mechanisms, and insufficient institutional coordination continue to hinder effective implementation and progress. This section outlines the most pressing issues, existing policy gaps, and actionable

opportunities for improvement across the following areas: energy, climate, transport, circular economy, social inclusion, waste and water management, sustainable food systems and rural development, agriculture, and biodiversity. Effectively addressing these challenges is essential to ensure that Kosovo's green transition is holistic, inclusive, and aligned with both EU environmental standards and regional climate commitments.

Table 1:

Commitments (ME)	Details	Status/Timeline
Energy Strategy Implementation	Approve and start the implementation of the Energy Strategy 2022-2031 in line with the European Green Deal and the Green Agenda for the Western Balkans. Ensure consistency with the draft NECP.	Approved. Implementation is ongoing.
Legal Framework for Clean Energy	Establish a legal framework to address challenges for a clean energy landscape (Law on Renewable Energy Sources).	Approved in Q2/2024; completed.
Renewable Energy Auctions	Conduct transparent and competitive auctions for RES investments. Completion of the 100 MW solar auction and identifying locations for wind and solar energy projects.	100 MW solar auction completed (Q1/2024).
Energy Storage Battery Project	Collaborate on the energy storage battery project funded by the Millennium Challenge Account (MCA).	Continuous.
Wind Energy auctions	Initiate the 150 MW wind energy project with IMF's Resilience and Sustainability Facility (RSF) funding under a Public-Private Partnership (PPP) scheme.	The first phase of the first of the two planned auctions for wind power started (Q4/2024). The pre-qualification phase concluded with three bids received (Q1/2025).
100 MW Solar Energy Project	Implement the 100 MW solar energy project in accordance with the project development agreement within two years of contract signing.	Project to be commissioned within two years of agreement.

Table 1 presents an overview of the key commitments made by the Ministry of Economy (ME) under the Green Agenda framework. It summarizes the planned actions, current implementation status, and projected timelines, offering a snapshot of Kosovo's ongoing efforts and future priorities.

4.1 Energy

Kosovo continued to make progress in advancing its energy transition in 2024, particularly through investments in grid modernization, energy efficiency, and the diversification of its energy mix. However, outdated coal dependency, regulatory barriers, and capacity gaps continue to limit the pace of reform. While new legislation and pilot auctions for renewable energy signal forward movement, much remains to be done to align the sector with EU standards and the Green Agenda for the Western Balkans.

According to the Progress Report for 2024 for the implementation of the Energy Strategy, the following achievements can be assessed⁷:

Grid and Infrastructure Investments:

Substantial investments were made in the transmission and distribution network, including low-voltage (0.4 kV), medium-voltage (35/10(20) kV), and new 110/10(20) kV nodes managed by TSO and DSO. These have contributed to enhanced reliability, reduced distribution losses, and improved quality of electricity supply. Upgrades to the Smart Grid infrastructure, such as the installation of digital meters and IT systems, have enabled remote billing, improved data security, and streamlined operations.

Energy Efficiency Gains: Energy efficiency (EE) measures implemented across public buildings at both municipal and central levels yielded savings of 6.6 ktoe/year. In the residential sector, 10,727 citizens received subsidies for solar water heating systems, photovoltaic systems for self-consumption, and efficient household appliances. The total financial support provided during 2024 amounted to €5.1 million, with 7,633 beneficiaries identified as climate-vulnerable households⁸.

District Heating and Cogeneration:

Continued investment in district heating led to the expansion and rehabilitation of the

“Termokos” network in Prishtina, including the installation of metering equipment. A feasibility study was finalized to double the cogeneration capacity of TPP “Kosova B” from 140 MWth to 280 MWth.

Renewable Energy Development: The Assembly adopted the Law on the Promotion of the Use of Renewable Energy Sources, published in the Official Gazette on 2 May 2024. Following this, a competitive auction for 100 MW of solar energy was successfully concluded on 31 May. A second auction for 100 MW of wind capacity was launched in December 2024. Additionally, four new professional standards were drafted for energy sector education, aligned with labor market demands.

Market Liberalization and Regional Integration: Kosovo made strides in regional cooperation through the operationalization of the day-ahead and intraday electricity markets via ALPEx, including the first intraday market auction. However, the Energy Regulatory Office (ERO) announced market opening for June 2024 with minimal stakeholder engagement, leaving businesses unprepared and raising concerns about institutional readiness and regulatory transparency.

Support for Vulnerable Consumers:

Vulnerable families continued to receive electricity subsidies in 2024 through a new protection program. However, the lack of a legal definition of energy poverty and inconsistent local data limits the design of targeted support. Funding remains scarce, and many municipalities lack the capacity to implement assistance effectively, highlighting deeper governance and financing gaps in delivering a just energy transition. The achievements of the 2024 objectives are presented in the table and graph below:

⁷ Progress Report for 2024 of the Kosovo Energy Strategy Implementation Program for the period 2022–2025. Source: <https://me.rks-gov.net/en/energy-2/>

⁸ Interview with the Head of Department of Energy/Ministry of Economy

Table 2:

	2022	2023	2024
Objective 1	59.2%	51.8%	45%
Objective 2	68.3%	51.3%	42%
Objective 3	62.8%	51.0%	59%
Objective 4	80.0%	60.0%	47%
Objective 5	98.0%	45.0%	91%
Total of objective implementation	73.7%	51.8%	57%

Figure 1: Percentage of implementation of objective January - December 2024

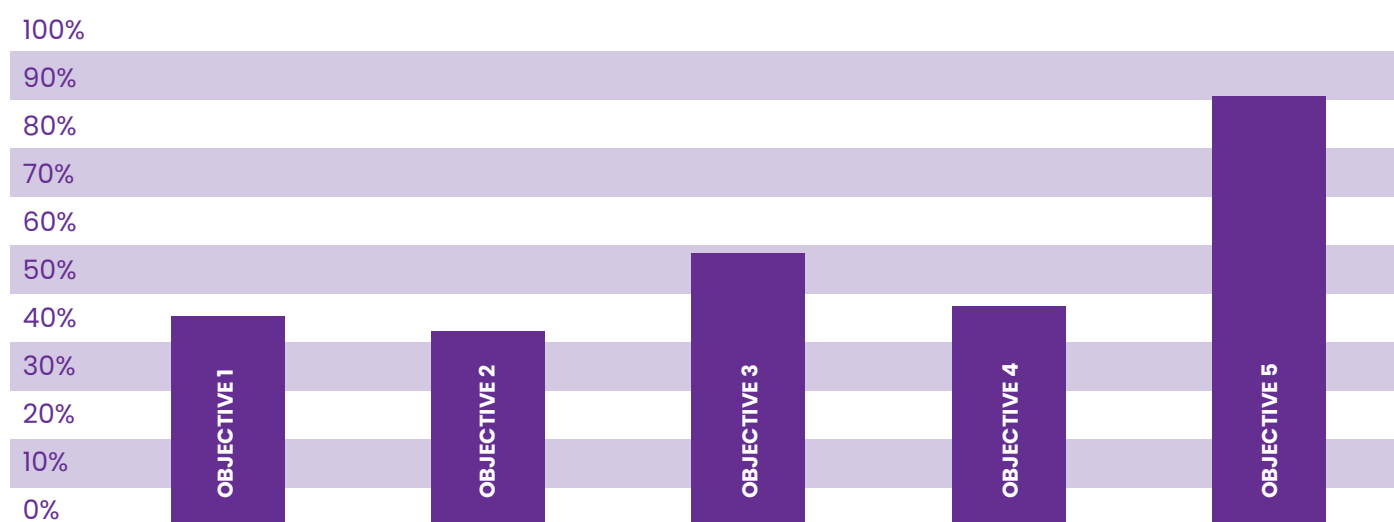


Table 2 and Figure 1 show the implementation progress of five energy objectives in Kosovo from 2022 to 2024. While average implementation declined overall, 2024 saw mixed results: Objective 5 achieved 91%, while others remained below 60%. The data highlights uneven progress and the need for stronger institutional coordination.

Structural and Operational Challenges

Despite these advances, Kosovo's energy sector continues to face persistent challenges:

- **Dependence on Coal:** Coal remains the dominant energy source in Kosovo, accounting for 90.4%⁹ of electricity

production, placing the country among the most coal-dependent globally, alongside Serbia (67%)¹⁰ and Bosnia and Herzegovina (65%)¹¹. Phasing out lignite will require significant structural and economic reforms.

- **Lag in Secondary Legislation and Institutional Capacity:** The newly established RES Unit within the Ministry of Economy lacks adequate staffing, technical expertise, and budgetary support to drive project implementation. Delays in adopting supporting secondary legislation further hinder investment approvals and slow the integration of renewables into the grid.

⁹ Energy Regulatory Office. 2024. Source: Annual Report 2024

¹⁰ Joint Research Centre. 2024. Green transition and Smart Specialization in the Western Balkans

¹¹ Eurostat. 2024. Source: <https://ec.europa.eu/eurostat/statistics-explained/index.php?oldid=641466&utm>

- *Limited Progress on Green Finance and Budgeting:* While Kosovo has initiated discussions around green finance mechanisms, it still lacks a structured approach to incorporating sustainability into budget planning. Public spending on environmental and energy transition programs remains insufficient.
- *Outdated Industrial Practices and Regulatory Constraints:* Industrial energy users continue to rely on inefficient technologies. Regulatory complexity and low competition in the energy market deter private sector investment in renewables. A clear roadmap for liberalization, including incentives and risk-sharing mechanisms, is still missing.

Energy Security and Market Performance

- In December 2024, Kosovo produced a gross electricity volume of 899.56 GWh, with consumption reaching 637.06 GWh, marking a 4.75% increase compared to December 2023.
- The share of alternative electricity in total consumption stood at 7.86%.¹²
- Imports amounted to 475.35 GWh, while exports totaled 144.35 GWh, underscoring the importance of addressing technical and commercial losses for system reliability¹³.
- Kosovo's transmission system operator, KOSTT, must ensure full compliance with the Connection Agreement with ENTSO-E, with zero deviations to maintain cross-border grid stability. Additionally, adoption of the NECP remains urgent and should be harmonized with recommendations from the Energy Community Secretariat¹⁴.

Just Transition Considerations

The coal sector remains a major employer in Kosovo. Of the estimated 138,000 coal-related jobs across the Western Balkans, 1.4% of all employment in Kosovo is tied to coal, double the rate in Poland (0.7%)¹⁵. Without a

structured just transition policy, the shift away from coal could disproportionately affect workers and communities.

BGF Assessment and Recommendations

To address both performance and structural gaps, BGF recommends the following:

1. *Ensure Timely Approval of Strategic Frameworks:* Expedite the adoption of the NECP and supporting secondary legislation to unlock EU-aligned investments and planning processes.
2. *Increase Renewable Energy Funding:* Commit to a minimum 15% annual increase in budget allocations for renewable energy projects over the next five years.
3. *Strengthen the RES Unit:* Expand the unit's capacity with technical experts, legal advisers, and financial planners to design and implement incentive schemes.
4. *Adopt Comprehensive Energy Legislation:* Pass the full package of amended energy laws to ensure alignment with the Electricity Integration Package and the Clean Energy Package.
5. *Accelerate Market Liberalization:* Define a clear liberalization roadmap, paired with regulatory reforms, risk mitigation tools, and communication with affected businesses.
6. *Establish Green Budgeting Mechanisms:* Institutionalize sustainability criteria in public budgeting to facilitate long-term investments in energy efficiency and renewable infrastructure.
7. *Enhance Public-Private Partnerships (PPPs):* Foster collaboration with private investors and international partners to deliver green infrastructure projects, especially in transmission, storage, and smart grid development.
8. *Develop a Just Transition Policy Framework:* Create a national plan to support workers and communities affected by coal phase-out, including re-skilling programs and social protection measures.

¹² Kosovo Statistical Agency. 2024. Source: <https://ask.rks-gov.net/Releases/Details/8481>

¹³ Kosovo Statistical Agency. 2024. Source: <https://ask.rks-gov.net/Releases/Details/8481>

¹⁴ European Commission. 2024. Source: Kosovo Report, https://enlargement.ec.europa.eu/kosovo-report-2024_en

¹⁵ Joint Research Centre. 2024. Source: Green transition and Smart Specialization in the Western Balkans

4.2 Climate

Kosovo has established a legal foundation for climate policy, but the institutional and operational mechanisms required for implementation remain underdeveloped. The adoption of the Law on Climate Change (No. 08/L-250) in January 2024 provides a formal framework for monitoring emissions, coordinating policy, and creating strategic planning instruments¹⁶. However, the country lacks a binding target for climate neutrality by 2050, and none of the five mandated strategies under the law – such as the Decarbonization Strategy and the Adaptation Strategy – have been finalized or adopted.

Status of Planning and Legislation

The NDC, adopted in March 2025, marks Kosovo's formal entry into international climate reporting structures. The NDC outlines a pathway to reduce greenhouse gas emissions by up to 42% by 2030, conditional on external financial support. This reduction scenario covers energy, transport, residential buildings, waste, agriculture, forestry, and land use.

The financial feasibility of the NDC is uncertain. Kosovo estimates a climate investment gap of €2.9 billion through 2030. However, the government currently allocates less than 0.5% of its national budget to environmental and climate-related programs, compared to the EU average of approximately 2%. Without increased and sustained public investment, implementation of the NDC targets is unlikely.¹⁷

The Climate Law also requires the establishment of a national MRV system and the creation of a National Climate Council. While these bodies have been initiated, they lack operational capacity and dedicated staff.

No national registry or emissions database has yet been made available to the public or to cross-sectoral institutions.

Implementation Challenges

Kosovo's ability to carry out climate policy is constrained by administrative, financial, and regulatory limitations:

- *Absence of a Long-Term Target:* No formal roadmap exists for reaching climate neutrality by 2050, nor are there intermediate emissions caps or sectoral benchmarks.
- *Weak Inter-Ministerial Coordination:* The Ministry of Economy manages energy infrastructure investments, while the Ministry of Environment, Spatial Planning and Infrastructure (MESPI)¹⁸ oversees climate oversight. Their responsibilities frequently overlap, delaying execution and undermining policy coherence.
- *Low Regulatory Capacity:* The national Division for Environmental Inspection employs 20 inspectors to cover all environmental, water, and nature-related violations in Kosovo.¹⁹ For comparison, Montenegro employs 35 inspectors at the national level despite having a smaller population. This enforcement deficit contributes to high non-compliance rates for industrial emissions and project development.²⁰
- *Inadequate Climate Risk Integration:* Environmental Impact Assessments (EIAs) are often conducted superficially or omitted altogether. Infrastructure and energy projects regularly proceed without climate screening or emissions accounting.
- *Growing Pressure on Infrastructure:* A reported 400% increase in air conditioning unit imports in 2024 highlights increased

16 Interview with the Strategic Planning Office of the PM Office

17 Ministry of Environment, Spatial Planning and Infrastructure. 2025. Source: <https://mmphi.rks-gov.net/News/NewsArticle?ArticleID=2464>

18 Interview with the Executive Director of NGO "EcoZ"

19 Interview already referenced above.

20 Ministry of Environment, Spatial Planning and Infrastructure. 2025. Source: <https://mmphi.rks-gov.net/Others/Department?DepartmentID=5>

household demand for temperature regulation.²¹ This trend reflects both exposures to heat extremes and continued dependence on coal-fired power, which increases grid vulnerability and emissions during peak use.

- *Limited Civic Participation:* Climate-related consultations rarely involve civil society groups. No formal advisory platform is in place for environmental NGOs, and public access to emissions data is currently unavailable.

Emissions Profile and Exposure

Kosovo emitted approximately 8.46 million tons of CO₂ equivalent in 2022. Carbon dioxide alone accounted for over 80% of the total²². The power sector is the primary source of emissions due to the use of lignite, followed by transportation and residential heating. Kosovo is also exposed to the CBAM, especially in the electricity and industrial metals sectors, though its current export volume to the EU (1% of GDP) limits the short-term fiscal impact.

BGF Assessment and Recommendations

To address these gaps, BGF proposes the following measures:

1. *Set a Legally Binding Climate Target:* Introduce legislation that commits Kosovo to achieving net-zero greenhouse gas emissions by 2050. Establish interim reduction targets for 2030 and 2040, supported by annual emissions tracking.
2. *Finalize and Operationalize Climate Strategies:* Complete and adopt the Decarbonization Strategy and Adaptation Strategy. Each should include cost estimates, sectoral targets, financing instruments, and implementation timelines.
3. *Increase Public Investment in Climate Programs:* Raise public spending on climate and environmental programs to at least 1% of GDP by 2027. Allocate funding toward municipal adaptation infrastructure, emissions monitoring systems, and climate-resilient agriculture.

4. *Establish a Central Coordination Authority:* Create a Climate Secretariat under the Prime Minister's Office to coordinate all climate-relevant planning, budgeting, and implementation across ministries.
5. *Expand Inspection and Enforcement Staff:* Increase the number of national environmental inspectors from 20 to at least 40 by 2026. Provide digital tools for emissions tracking, project audits, and enforcement follow-up.
6. *Mandate and Enforce EIAs for All Large Projects:* Require climate risk assessments and GHG projections for all public and private infrastructure projects exceeding €1 million in value.
7. *Prepare for Carbon Pricing Integration:* Begin developing a roadmap for introducing a carbon pricing mechanism in electricity and industry sectors. Align future policies with EU Emissions Trading System (ETS) benchmarks.
8. *Create Civic Participation Mechanisms:* Establish an official Climate Advisory Platform to include representatives from civil society, academia, and municipalities in the design and review of climate policies.

4.3 Transport

Kosovo's transport sector remains in a transitional phase, characterized by strategic planning efforts on paper but slow progress in implementation. The adoption of the Multimodal Transport Strategy 2023–2030 and the endorsement of a Single Project Pipeline in 2024 signal intent to modernize infrastructure and align with the EU acquis. However, execution timelines, environmental compliance, and institutional capacity have not kept pace with these commitments.

Policy and Project Developments

In December 2023, the Government of Kosovo formally adopted the Multimodal Transport Strategy (MMTS) along with its action plan, followed by approval of the transport sector's Single Project Pipeline by the Strategic

21 Reuters. 2024. Source: <https://www.reuters.com/world/europe/balkans-new-love-air-conditioning-strains-grid-temperatures-soar-2024-08-14/>

22 International Energy Agency. 2022. Source: <https://www.iea.org/data-and-statistics>

Planning Committee in June 2024.²³ These frameworks are designed to prioritize investment and policy coherence across road, rail, and urban transport. At the project level, efforts are ongoing to rehabilitate key regional corridors, including the Pristina–Durrës railway and the Prizren–Tetovo road. In February 2024, Kosovo signed a memorandum of understanding with the European Bank for Reconstruction and Development (EBRD) to mobilize up to €400 million in support of infrastructure modernization and green mobility projects by 2027.²⁴

Despite these frameworks and agreements, implementation has been inconsistent:

- Environmental impact assessments (EIAs) for major transport projects remain either incomplete or outdated, impeding regulatory approval and violating EU standards.
- Project timelines are regularly extended, and cost adjustments are frequent due to weak planning, land acquisition delays, and contractor coordination failures.

Key Constraints

- *Limited Urban Transport Capacity:* Major cities such as Pristina and Gjilan operate with outdated bus fleets and limited route coverage. No municipality has adopted a legally binding Sustainable Urban Mobility Plan (SUMP).
- *Institutional Gaps:* Administrative responsibilities for transport infrastructure are split across multiple levels of government without effective coordination mechanisms. Project oversight remains centralized, leaving municipalities with little authority or budgetary flexibility to manage local mobility planning.
- *Lack of Climate Integration:* Climate resilience is not systematically included in road or rail infrastructure planning. Transport projects are not evaluated for exposure to heatwaves, flooding, or long-term emissions reduction potential.

- *Underdeveloped Alternative Transport Modes:* Kosovo has no operational electric bus lines, no national incentives for electric vehicle (EV) adoption, and minimal infrastructure for non-motorized transport. There are fewer than 10 public EV charging stations operating across the country, none of which are fully integrated into municipal mobility networks.
- *Delays in Legal Reform:* The Law on Transport, currently under revision, is not expected to be finalized before September 2025. In its current form, it lacks provisions for digital traffic management, emissions tracking, or support for shared mobility models.

BGF Assessment and Recommendations

To align Kosovo's transport sector with the goals of the Green Agenda and EU mobility standards, the following actions are recommended:

1. *Complete Legal Reform on Schedule:* Finalize and enact the revised Law on Transport by Q3 2025. The law should include clear provisions on public transport service standards, low-emissions zones, data-driven planning, and support for electric and shared mobility systems.
2. *Mandate Urban Mobility Plans:* Require all cities over 50,000 residents to adopt and implement Sustainable Urban Mobility Plans (SUMPs) by 2026, including integrated strategies for non-motorized transport and emissions reduction.
3. *Scale Up Investment in Public Transit:* Allocate at least 25% of annual transport infrastructure funding to public transport development by 2026, with a focus on electric buses, bus rapid transit (BRT), and intelligent ticketing systems.
4. *Introduce EV Incentive Framework:* Establish a national package of incentives for EV adoption, including VAT exemption, zero import tax for electric vehicles and charging equipment, and dedicated EV infrastructure in all municipalities by 2027.

23 European Commission. 2024. Source: Kosovo Report, https://enlargement.ec.europa.eu/kosovo-report-2024_en

24 EBRD. 2025. Source: <https://www.ebrd.com/home/news-and-events/news/2024/ebd-strengthens-support-to-kosovos-governmental-institutions.html>

5. *Develop and Implement ITS Strategy:* Operationalize a National Intelligent Transport Systems (ITS) Strategy that outlines a phased deployment of smart traffic lights, real-time passenger information systems, and transport data sharing between municipalities and national authorities.
6. *Strengthen Environmental Oversight of Transport Projects:* Make climate screening and environmental impact assessments mandatory for all infrastructure projects exceeding €2 million. Establish an EIA review panel within MESPI with transport-sector expertise.
7. *Enhance Cross-Border Mobility Infrastructure:* Prioritize completion of regional rail and road connections with North Macedonia, Albania, and Serbia by 2027 to improve economic integration and reduce emissions from freight transport.

4.4 Circular economy

Kosovo has introduced policy instruments that recognize the circular economy as a national priority, most notably the adoption of the Circular Economy Roadmap. However, implementation remains superficial. Waste generation continues to outpace recycling and reuse infrastructure, while enforcement of circular economy principles is absent in procurement, product design, and industrial processes. No measurable transition indicators have been established, and national targets for material reuse or recovery are not defined in legislation²⁵.

Policy Landscape and Institutional Gaps

The Circular Economy Roadmap, although adopted, lacks an accompanying action plan with deadlines, funding sources, and defined institutional roles. This has led to fragmented implementation, particularly at the municipal level, where local governments lack the funding and capacity to develop reuse systems or enforce waste separation. Additionally, no legal obligations mandate inclusion of marginalized groups, such as waste pickers or women-led cooperatives, in circular economy schemes. This absence of

legal and financial scaffolding undermines both the social and environmental potential of circularity reforms.

Sectoral Performance

- *Waste Management:* Only 2.5% of total municipal solid waste is currently recycled. Source separation is not practiced systematically. Most waste is sent to landfills, including materials suitable for reuse or industrial repurposing. The Deposit Refund System (DRS), under development, is not yet operational.
- *Business Sector Engagement:* The private sector shows low participation in circular practices. No tax incentives, subsidies, or recognition programs exist for businesses that reduce material use or apply circular models. Green procurement requirements are not legally enforced in public tenders.
- *Financing Instruments:* Funding for circular economy investments is limited. The Kosovo Energy Efficiency Fund (KEEF) has awarded some grants to green technology applicants, but no dedicated circular economy financing window has been created. Municipal budgets lack allocations for waste prevention or reuse infrastructure.
- *Civil Society and International Engagement:* Although Kosovo is a member of the International Union for Conservation of Nature (IUCN), its environmental NGOs are absent from key global circular economy networks, such as BioNet. This restricts access to capacity-building, financing, and advocacy platforms.

Barriers to Progress

- No legal obligation exists for businesses or municipalities to meet recovery or recycling thresholds.
- Local governments lack the technical and financial capacity to enforce circular economy practices.
- Institutional mandates overlap between MESPI, the Ministry of Economy, and the Ministry of Agriculture, with no single lead body accountable for coordination.

²⁵ European Commission. 2024. Source: Kosovo Report, https://enlargement.ec.europa.eu/kosovo-report-2024_en

- The absence of reliable data on industrial material flows prevents baseline assessments and monitoring.

BGF Assessment and Recommendations

To transition from concept to implementation, Kosovo should adopt a legally binding framework and scale targeted investments. Recommended actions include:

1. *Adopt an Action Plan with Binding Targets:* Develop and implement a National Circular Economy Action Plan with clear targets for reuse, recycling, and recovery by sector. Include a compliance mechanism and mandatory annual progress reporting.
2. *Introduce Producer Responsibility Legislation:* Enact and enforce Extended Producer Responsibility (EPR) laws for packaging, electrical and electronic equipment, and textiles. Require annual disclosures of material collection and recycling rates from registered producers.
3. *Establish Financial Incentives for Circular Business Models:* Create a dedicated funding window within KEEF or a new Circular Economy Innovation Fund, offering grants and low-interest loans for material efficiency, waste minimization, and eco-design.
4. *Make Green Procurement Legally Binding:* Amend public procurement law to require circularity criteria in all national and municipal tenders above €50,000. Provide procurement officers with training and tools to evaluate circular offers.
5. *Strengthen Local Government Capacity:* Provide technical assistance and budgetary support to municipalities to develop and implement local circular economy strategies, including waste separation infrastructure and reuse centers.
6. *Expand Civil Society and International Linkages:* Support Kosovo-based NGOs in gaining membership in international environmental networks, and create a national civil society platform for circular economy monitoring and policy input.

7. *Develop a National Material Flow Database:* Task the Kosovo Statistical Agency with collecting disaggregated data on material inputs, use, and post-consumption treatment to establish national baselines and inform sectoral priorities.

4.5 Inclusion

Inclusion remains a poorly integrated dimension of Kosovo's environmental transition. One of the EU's core guiding principles for sustainable development – the commitment to "Leave No One Behind" – calls for the inclusion of all segments of society, particularly the most vulnerable, in climate action and the green transition. However, in Kosovo, this principle is not yet meaningfully reflected in current climate or energy strategies. Inclusion is treated as an afterthought rather than a foundational pillar.²⁶

The absence of clear definitions, targeted mechanisms, and institutional mandates means that marginalized communities risk being excluded from the benefits of the green transition. Current climate and energy policies lack targeted mechanisms to involve marginalized communities, low-income households, and civil society actors in planning or implementation. Without clearer definitions, eligibility criteria, or institutional mandates, the green transition risks reinforcing existing inequalities in energy access, participation, and funding.

Policy and Data Gaps

Kosovo has yet to establish a legal definition of energy poverty, making it impossible to design targeted protection or subsidy programs beyond the current system of means-tested support for war veterans and social assistance recipients. As a result, an estimated 43% of households struggle to cover heating and electricity costs²⁷, while 25.4% are classified as energy-poor under World Bank benchmarks (spending over 10% of

26 European Commission. 2024. Source: Kosovo Report, https://enlargement.ec.europa.eu/kosovo-report-2024_en

27 Balkan Green Foundation. 2025. National Report on the nexus between energy poverty, energy transition and energy communities in rural areas and the youth's role in Kosovo.

income on energy)²⁸. No government body is currently responsible for regularly monitoring or updating this data.

Although the NECP 2025–2030 acknowledges energy poverty and calls for a “vulnerable consumer protection scheme,” no progress has been made on its operationalization. Local authorities lack guidance and financial tools to develop inclusion-based energy or climate programs.

Barriers to Inclusive Participation

- *Limited Public Awareness*: Environmental education and outreach campaigns have not been scaled beyond pilot projects. Citizens are largely unaware of their rights under energy efficiency schemes or their potential role in climate decision-making.
- *Unequal Municipal Capacity*: Most municipalities lack environmental planning departments and rely on general administrative staff to implement green policies. Only a few municipalities have received targeted training on inclusion, climate equity, or sustainable service delivery.
- *Access to Finance*: Civil society organizations, particularly those representing women, youth, or minority groups, report difficulty accessing national or international green funding. While some grant schemes exist (e.g. through KCSF), their scope and budget are limited, and funding does not prioritize inclusion in environmental programming²⁹.
- *Fragmented Governance*: No national framework exists to integrate participatory governance into environmental decision-making. Citizen consultation is discretionary, and few ministries or municipalities operate feedback mechanisms or participatory planning platforms.

Programs such as the EDI Plus Project (2020–2023), funded by the Austrian

Development Agency, demonstrated that targeted investments in minority engagement and local dialogue can enhance inclusive governance³⁰. However, lessons from such initiatives have not been mainstreamed. No replication or upscaling of inclusion-focused environmental programming has occurred at the national level.

Moreover, Kosovo lacks data disaggregation by income, gender, ethnicity, or disability in most environmental sectors, making it difficult to measure who benefits from public subsidies, energy efficiency programs, or climate adaptation measures.

BGF Assessment and Recommendations

To ensure that Kosovo’s green transition is socially inclusive and does not leave vulnerable populations behind, the following actions are recommended:

1. *Legally Define and Monitor Energy Poverty*: Establish an official definition of energy poverty, aligned with international standards, and assign monitoring responsibility to the Kosovo Statistical Agency. Update household energy data annually and disaggregate by gender, income, and location.
2. *Operationalize a Vulnerable Consumer Protection Scheme*: Design and implement a subsidy and support program targeting energy-poor households, integrating bill discounts, appliance upgrades, and advisory services. Mandate its rollout through the NECP implementation framework.
3. *Expand Municipal Capacity and Funding*: Provide municipalities with direct grants and technical assistance to implement inclusive climate programs. Require each municipality to develop a local inclusion strategy as part of its climate or energy planning documents.
4. *Mainstream Inclusion in Green Finance*: Designate 15% of national and donor-funded climate and energy programs for projects that serve women, youth, ethnic

28 The World Bank. 2019. Poverty and Distributional Analysis of Electricity Poverty and Protection of Vulnerable Customers in Kosovo

29 The Kosovo Civil Society Foundation. Source: https://kcsfoundation.org/en/grants/?utm_source

30 Austrian Development Agency. Source: <https://www.entwicklung.at/en/projects/detail-en/edi-plus-empowerment-of-kosovo-minorities-through-education-dialogue-and-involvement-in-decision-making-processes>

minorities, or persons with disabilities. Require inclusive impact metrics in funding criteria.

5. *Create a Participatory Governance Framework:* Institutionalize public consultation requirements for all national strategies and major infrastructure projects with environmental impacts. Establish a national participation portal to collect feedback and publish consultation outcomes.
6. *Develop Targeted Awareness Campaigns:* Launch multi-platform campaigns in schools, communities, and public media focused on household energy rights, environmental health, and climate resilience. Partner with civil society groups for outreach in marginalized communities.
7. *Monitor Inclusion in Policy Outcomes:* Require line ministries to report annually on the inclusiveness of policy outcomes, using quantitative indicators such as the number of households reached, participation rates by demographic, and local government uptake.

4.6 Waste management

Kosovo's waste management system remains underregulated, underfunded, and misaligned with the requirements of the EU Waste Framework Directive. While progress has been made in terms of legislative drafting – such as the adoption of laws on packaging waste and the movement of hazardous waste—implementation and enforcement are limited. Recycling infrastructure is minimal, and most municipalities lack the capacity or incentives to operationalize sustainable waste practices.

Current Legislative Framework

The legal framework includes the Law on Waste (2022), as well as accompanying regulations on packaging waste and the transboundary movement of waste. These introduce principles of extended producer responsibility and the 'polluter pays' concept. Although the legal framework formally introduces Extended Producer Responsibility (EPR) and the 'polluter pays' principle, enforcement is inconsistent due to limited inspection capacity and the absence of

dedicated funding mechanisms. Many municipalities lack the financial resources to operationalize source separation or establish recycling infrastructure, revealing a critical misalignment between legal mandates and implementation feasibility. These challenges reflect a broader systemic issue: the failure to back legislative ambition with sustained budgetary support. The Integrated Waste Management Strategy (2024–2035) and its Action Plan (2024–2026) lay out a roadmap for improving collection coverage, infrastructure, and recycling rates. Yet the strategy is not supported by a dedicated implementation budget, and its performance indicators are not currently tracked or published. Inclusion, financing, and implementation gaps significantly affect the sector's functionality. For example, the lack of inclusive planning processes limits community buy-in and accountability, while the absence of adequate budget allocations hampers the ability of municipalities to fulfill legal obligations.

Infrastructure and Service Coverage

- *Recycling and Separation:* Kosovo's national recycling rate is approximately 2.5%, one of the lowest in Europe. Waste separation at the source is almost entirely absent, and most recyclable materials are sent to landfill or left in unmanaged dumpsites.
- *Collection Services:* Urban areas have between 90–95% waste collection coverage, while rural areas remain underserved. There is no universal waste registry or real-time monitoring of collection frequency, routes, or efficiency.
- *Illegal Dumping:* The number of illegal dump sites decreased from 747 in 2022 to 373 in 2023, due to cleanup campaigns and enforcement drives. However, the recurrence of unauthorized sites remains high due to lack of surveillance and sanctions.³¹
- *Human Resources:* Kosovo has fewer than 60 environmental inspectors operating at both national and municipal levels. Most municipalities do not employ a full-time waste management officer, relying instead

31 European Commission. 2024. Source: Kosovo Report, https://enlargement.ec.europa.eu/kosovo-report-2024_en

on multifunctional staff without technical training.³²

Structural Constraints

- *Funding:* Municipalities rely on limited service fees and ad hoc donor projects to finance waste operations. National government contributions are minimal, and no performance-based funding mechanism exists to incentivize improvements in recycling or landfill diversion.
- *Monitoring and Reporting:* Although a digital platform with 20 performance indicators was introduced, it is not systematically updated or linked to enforcement actions. Data on waste generation, composition, and treatment is fragmented and not publicly accessible.
- *Deposit Refund System (DRS):* A DRS for beverage containers is under development, but has not yet been piloted or legislated. Its future implementation timeline remains undefined.

BGF Assessment and Recommendations

To modernize Kosovo's waste management system and comply with EU circular economy principles, the following measures are recommended:

1. *Mandate Source Separation of Waste:* Amend existing legislation to require mandatory separation of recyclables at household and business levels in all municipalities by 2026. Introduce penalties for non-compliance and incentives for early adoption.
2. *Establish a National Waste Data Portal:* Operationalize a central digital platform for real-time monitoring of waste collection, processing, and landfill rates. Require monthly data submission from municipalities and private operators.
3. *Fund Infrastructure Through Green Budgeting:* Create a ring-fenced national budget line for municipal recycling and composting infrastructure. Prioritize co-financing with EU and bilateral donors for materials recovery facilities in regions currently dependent on landfills.

4. *Scale Up Inspection and Enforcement Capacity:* Double the number of trained waste management inspectors by 2026. Allocate inspection staff at the municipal level in all cities with more than 30,000 residents.
5. *Operationalize the Deposit Refund System:* Pass enabling legislation for the national DRS and initiate a pilot program in two urban municipalities by 2025. Define operational roles for producers, retailers, and municipal authorities.
6. *Adopt a Performance-Based Municipal Financing Scheme:* Introduce conditional grants for municipalities that demonstrate improvements in recycling rates, collection coverage, or illegal dumping reductions. Base disbursements on audited performance data.
7. *Improve Public Communication and Accountability:* Launch annual waste reporting dashboards for each municipality, and require local authorities to publish planned improvements, procurement activities, and complaint handling statistics.

4.7 Water management

Despite modest strategic efforts, Kosovo's water management sector remains underperforming and structurally weak. The Revised Water Strategy (2022–2030) outlines a vision for integrated water resource management, yet tangible progress is hindered by legislative gaps, institutional fragmentation, and underinvestment. The country continues to face mounting environmental and public health challenges due to unchecked pollution, lack of wastewater treatment, and low administrative capacity for enforcement.

A significant shortcoming is the country's dependence on rudimentary infrastructure. As of 2024, only five municipalities operate functional wastewater treatment plants, and even these do not operate at full capacity. A staggering 75% of municipal wastewater is discharged untreated, often directly into natural water bodies. In towns like Ferizaj and

32 U.S. International Trade Administration. 2024. Source: Kosovo – Country Commercial Guide, <https://www.trade.gov/country-commercial-guides/kosovo-waste-management-and-recycling>

Mitrovica, outdated sewage systems leak into rivers, contributing to deteriorating ecosystem health and posing long-term risks to drinking water sources.

The institutional dimension is equally concerning. Environmental inspectors lack specialization in hydrology and sanitation systems, with fewer than 10 inspectors across Kosovo possessing targeted expertise in water quality enforcement. Municipalities, which are tasked with key operational roles, are chronically underfunded and largely excluded from decision-making, with only 4% reportedly engaged in water governance planning.

Moreover, there is an acute data deficiency. Kosovo has yet to establish a national platform for water monitoring. Basic indicators such as daily water abstraction, contamination events, or industrial discharge compliance are either uncollected or remain inaccessible to the public. This absence of data hampers both crisis response and long-term planning, creating a reactive rather than proactive management culture.

One emblematic case is the Drini i Bardhë³³ river basin. As a major freshwater source, it suffers from overlapping environmental pressures: illegal gravel extraction, nutrient runoff from agricultural lands, and effluents from food processing industries. While a river basin plan exists in draft, it remains unadopted, and no enforcement measures have been piloted.

Legal and Institutional Status

Although the Law on Water is under revision, it has yet to be adopted. The absence of updated legislation impedes enforcement of existing standards and delays the integration of EU Water Framework Directive principles.

Furthermore, river basin management plans, required under both national and EU standards, remain in draft form and are not applied in infrastructure planning or pollution control.

Only 4% of municipalities are actively involved in water management decision-making. Local water governance structures – such as basin councils, monitoring units, or inspection offices – are either under-resourced or not established³⁴.

Infrastructure and Pollution

- *Wastewater Treatment:* Approximately 75% of municipal wastewater is discharged untreated into rivers and streams. The limited number of operational wastewater treatment plants are concentrated in urban centers, and rural areas are entirely excluded.
- *Water Storage and Supply:* Kosovo has 300 cubic meters of water storage capacity per capita, far below the regional average of 799 m³. This low reserve capacity makes the country vulnerable to seasonal shortages and limits agricultural and industrial productivity.³⁵
- *Groundwater Management:* Around 26% of Kosovo's drinking water comes from wells and boreholes, many of which are unregulated and unmonitored. No groundwater abstraction permits are enforced in practice, and contamination risks are not assessed.³⁶
- *Biological Monitoring:* Biological indicators of water quality—such as macroinvertebrates, algae, or fish populations—are not systematically tracked. The country lacks a national bio-monitoring program, leaving pollution impacts on ecosystems largely undocumented.

33 The World Bank (2020): <https://www.worldbank.org/en/results/2020/10/27/developing-a-long-term-and-holistic-approach-to-strengthen-water-security-in-kosovo>

34 European Commission. 2024. Source: Kosovo Report, https://enlargement.ec.europa.eu/kosovo-report-2024_en

35 The World Bank. 2020. Source: Developing a Long-term and Holistic Approach to Strengthen Water Security in Kosovo, <https://www.worldbank.org/en/results/2020/10/27/developing-a-long-term-and-holistic-approach-to-strengthen-water-security-in-kosovo>

36 Interview with the Executive Director of NGO "EcoZ"

Enforcement and Capacity

The institutional framework is characterized by weak inter-agency coordination and severe staffing constraints:

- *Inspection Deficit:* Environmental and water inspections are conducted by a small group of national inspectors without specialization in hydrology or sanitation systems. Many municipalities have no inspectors with water management training.
- *Permitting Weakness:* The process for issuing water extraction and wastewater discharge permits lacks consistency. Applications are often processed without field inspections or impact assessments.
- *Data Availability:* Water consumption, leakage rates, and contamination events are not systematically recorded. There is no open data portal for water quality, usage, or permit compliance.

BGF Assessment and Recommendations

To address systemic failures in water management and align with EU environmental standards, Kosovo should adopt the following reforms:

1. *Enact and Enforce a New Water Law:* Finalize and adopt the revised Law on Water by 2025, incorporating EU Water Framework Directive provisions. Assign clear responsibilities for monitoring, licensing, and river basin coordination.
2. *Operationalize River Basin Management Plans:* Approve and implement river basin management plans for all major basins by 2026. Establish basin councils with legal authority to oversee local enforcement and coordinate cross-municipal initiatives.
3. *Invest in Wastewater Treatment Infrastructure:* Prioritize construction of wastewater treatment plants in towns with over 15,000 residents. Allocate public funds and donor financing for plant design, operation, and performance monitoring.
4. *Create a National Groundwater Regulation Framework:* Introduce mandatory registration and permitting for all groundwater abstraction points. Require water quality testing and impact assessments for new boreholes and wells.
5. *Develop a Biological Monitoring Program:* Launch a national water bio-monitoring

scheme by 2026, with annual reporting on freshwater ecosystem health. Partner with universities and NGOs for sample collection and data interpretation.

6. *Expand Municipal Capacity and Technical Staffing:* Provide municipalities with dedicated water officers trained in permitting, monitoring, and compliance. Offer targeted grants for staffing in municipalities with river pollution hotspots.
7. *Establish a Public Water Data Platform:* Create a centralized, publicly accessible online platform to publish water usage, pollution events, permit data, and infrastructure performance by municipality and river basin.

4.8 Sustainable Food Systems and Rural Areas

Kosovo's sustainable food systems remain more aspirational than operational, reflecting a disconnect between policy intent and local realities. The sector continues to function under a conventional, productivity-focused paradigm, with insufficient attention to ecological sustainability, rural equity, and value chain resilience. Although several policy documents reference green objectives, including the National Organic Action Plan and the Digital Agriculture Programme, their influence is minimal on the ground.

Agricultural practices in Kosovo largely ignore climate vulnerabilities and biodiversity considerations. For instance, while the FAO-supported Digital Agriculture Programme proposes digitizing agricultural advisory services and land monitoring, it has yet to extend beyond centralized feasibility studies. Local extension services are ill-equipped to deploy or maintain digital tools, and most farmers – especially those in mountainous and minority-populated areas – remain unaware of available support mechanisms.

Infrastructure remains a critical constraint. A significant share of food loss – estimated at 30% for perishables, is directly tied to poor logistics. In Gjakova and Dragash, raspberry and dairy cooperatives report seasonal spoilage due to insufficient cold storage and transport networks. These inefficiencies

reduce farmer incomes and discourage diversification toward higher-value, eco-friendly crops³⁷.

Rural development has also failed to embrace inclusive governance models. Smallholder producers, particularly women and ethnic minorities, are rarely consulted in policy design or targeted through public procurement schemes. In contrast to regional neighbors, Kosovo has no functioning “farm-to-school” or “local food procurement” programs that link producers to public institutions such as schools or hospitals.

Policy Status and Institutional Capacity

The agriculture and rural development policy framework, including the Strategic Plan for the Kosovo Advisory System and the National Organic Action Plan 2023–2026, exists but remains disconnected from broader sustainability objectives. These documents lack binding targets for environmental protection, biodiversity preservation, or climate adaptation in agricultural practice.

The Digital Agriculture Programme, developed with FAO support, is a positive step toward integrating data and technology into agricultural policy. However, implementation remains limited to high-level assessments. The program does not yet include concrete mechanisms for training, extension services, or the deployment of climate-smart tools at the farm level.³⁸

Core Challenges

- *Limited Organic and Ecological Farming:* Certified organic farming represents less than 1% of total agricultural production in Kosovo. There are no national subsidies tied specifically to organic or regenerative practices, and existing schemes for agri-environmental support are fragmented or underfunded.
- *Infrastructure Deficits:* Many rural areas face poor road access, unreliable irrigation

systems, and weak post-harvest storage capacity. These limitations increase food loss, reduce competitiveness, and disincentivize investment in sustainable practices.

- *Lack of Market Access:* Smallholder farmers lack consistent access to domestic and international markets due to a combination of poor transport logistics, limited certification schemes, and the absence of collective marketing initiatives.
- *Underdeveloped Innovation Ecosystem:* Agricultural research institutions are underfunded and poorly integrated into national policy processes. There are no national research calls focused on agro-ecology, carbon sequestration, or biodiversity-friendly cropping systems.
- *Neglect of Marginalized Groups:* Women, youth, and ethnic minorities remain largely absent from decision-making bodies in the agricultural sector. There are few programs designed to improve their access to land, credit, or extension services.

Strategic Risks

- Kosovo’s reliance on intensive farming practices contributes to land degradation, biodiversity loss, and vulnerability to climate stress. Without intervention, agriculture will continue to underperform on both productivity and sustainability metrics.
- Delays in aligning national policies with EU rural development standards will impede Kosovo’s access to pre-accession agricultural funds and broader Green Agenda support mechanisms.

BGF Assessment and Recommendations

Kosovo must integrate sustainability into its agricultural and rural development agenda to ensure food system resilience, climate compatibility, and long-term competitiveness. The following measures are recommended:

1. *Develop a National Green Agriculture Strategy:* Create a unified strategy by

37 European Commission. (2024). Kosovo Report 2024. Brussels.

38 FAO. 2024. Source: <https://www.fao.org/digital-villages-initiative/europe/news-and-articles/news-and-articles-detail/kosovo-launches-the-development-of-the-digital-agriculture-programme-and-action-plan-with-fao-support/en>

2026 that incorporates targets for organic farming, soil health, biodiversity, and climate mitigation. Align the strategy with the EU Common Agricultural Policy (CAP) environmental objectives.

2. *Introduce Subsidies for Sustainable Practices:* Design a targeted agri-environmental payments scheme that provides direct financial incentives for crop rotation, cover cropping, reduced pesticide use, and agroforestry. Prioritize support for smallholders and farmers in erosion-prone areas.
3. *Expand Infrastructure for Market Access:* Invest in rural roads, cold storage facilities, and local processing units through a dedicated rural infrastructure fund. Tie financing to sustainability benchmarks, such as energy efficiency and waste reduction.
4. *Operationalize the Digital Agriculture Programme:* Provide municipalities and cooperatives with hardware, connectivity, and training to support digital farm management systems. Establish regional demonstration plots showcasing climate-resilient technologies.
5. *Promote Research and Innovation in Sustainable Farming:* Fund applied research in soil carbon management, organic pest control, and climate-adapted crops. Partner with universities to launch competitive research grants tied to national sustainability goals.
6. *Support Inclusion in Rural Development:* Mandate that 30% of rural development funds be allocated to women, youth, and minority-owned agricultural enterprises. Introduce gender-responsive budgeting in all agri-finance programs.
7. *Monitor and Report on Sustainability Indicators:* Require annual publication of agri-environment indicators, including fertilizer use, pesticide application rates, water use efficiency, and share of organic land under cultivation.

4.9 Agriculture

Agriculture in Kosovo remains paradoxical: it is a cornerstone of rural livelihoods and national food security, yet structurally misaligned with sustainability imperatives and European integration goals. The sector's high contribution to Gross Value Added (7.8% in 2023) obscures deep inefficiencies, environmental externalities, and weak competitiveness³⁹.

The current model is characterized by extractive practices and short-term thinking. Soil erosion in hill-intensive areas such as Anamorava and Dukagjini has reached critical levels, with an estimated annual loss of 5–10 tonnes of topsoil per hectare. These losses, coupled with increasing dependence on imported fertilizers –up 24% since 2019 –signal a system under stress. Yet, Kosovo lacks a National Soil Health Program, and there is no law regulating land conversion or soil contamination. Furthermore, Kosovo's trade imbalance in agri-food products remains stark: EU exports to Kosovo reached €598 million in 2023, while imports from Kosovo totaled only €48 million, underscoring competitiveness gaps in both quantity and quality⁴⁰.

Subsidy policies further entrench unsustainable practices. More than 70% of agricultural payments are area-based, without linkage to environmental performance or climate adaptation. This approach favors larger, conventional producers and offers little incentive for biodiversity-friendly farming, crop diversification, or reduced pesticide use.

On the institutional side, advisory services remain fragmented and under-resourced. Agents operate without standardized training, and there is no performance evaluation system. Meanwhile, the research ecosystem is nearly absent from policy processes. No public funds have been allocated for agroecological trials or demonstration farms—an essential tool for scaling sustainable innovations.

39 World Bank Group Data. 2023. Source: <https://data.worldbank.org/indicator/NV.AGR.TOTL.ZS?locations=XK&utm>

40 European Union in Kosovo. 2024. Source: Agri-Food Trade Statistical Factsheet, https://agriculture.ec.europa.eu/system/files/2023-05/agrifood-kosovo_en.pdf

Kosovo's absence from EU pre-accession agricultural funding programs (such as IPARD III) is symptomatic of this misalignment. Without reforms that incorporate traceability, environmental safeguards, and market integration strategies, the sector risks marginalization in the evolving European agri-food economy.

Policy Framework and Institutional Progress

Several key documents have been adopted in recent years, including the Law on Market Organisation for Agricultural Products, the National Programme for Agriculture and Rural Development (2023–2027), and the Strategic Plan for the Kosovo Advisory System. While these instruments create a formal structure for sector governance, they fail to embed climate adaptation, environmental protection, or biodiversity preservation as measurable policy outcomes.

The National Organic Action Plan (2023–2026) outlines objectives for promoting organic agriculture, but lacks a dedicated funding line, implementation timeline, or institutional accountability framework.

Operational and Environmental Challenges

- *Land Use and Soil Degradation:* Kosovo has no binding regulatory framework for sustainable land use or soil protection. Agricultural expansion frequently occurs without environmental screening, leading to erosion, loss of topsoil, and water runoff contamination⁴¹.
- *Fragmented Advisory Services:* Extension services are underfunded and fragmented across municipalities and agencies. There is no standardized training program or national performance evaluation for advisory agents.
- *Absence of Agroecological Integration:* Agro-solar projects, crop-livestock integration, and permaculture remain undeveloped due to a lack of regulatory clarity and pilot initiatives. No national registry exists for sustainable agriculture pilots or

demonstration farms.

- *Agri-Environmental Indicators Missing:* Kosovo does not track fertilizer use per hectare, irrigation efficiency, or agricultural emissions in its national statistical system, making it impossible to assess environmental externalities or design corrective policy.
- *Protection of Agricultural Land:* There is no strategic land protection mechanism to prevent conversion of arable land for non-agricultural use. Urban expansion and informal construction continue to reduce Kosovo's agricultural land base.⁴²

BGF Assessment and Recommendations

To build a modern, resilient, and EU-compatible agricultural sector, Kosovo must integrate environmental sustainability into its agricultural development model. The following actions are recommended:

1. *Legislate Land and Soil Protection Measures:* Pass a Law on Agricultural Land Protection that sets limits on non-agricultural land conversion and introduces penalties for unauthorized development. Include soil erosion and fertility benchmarks in land-use planning.
2. *Operationalize Agro-Solar Integration:* Develop technical and legal guidelines for dual-use land systems that combine renewable energy generation with crop production. Launch pilot projects in regions with high solar potential and low irrigation coverage.
3. *Strengthen Advisory Systems and Certification:* Standardize and expand agricultural extension services with training on climate-resilient practices, organic production, and market integration. Establish performance targets and monitoring for advisory personnel.
4. *Fast-Track Pending Legislation:* Finalize and enforce the implementing legislation on the market organization for agricultural products. Introduce traceability and labeling requirements for domestic produce to support market access and consumer trust.

41 European Commission. 2024. Source: Kosovo Report, https://enlargement.ec.europa.eu/kosovo-report-2024_en

42 European Commission. 2024. Source: Kosovo Report, https://enlargement.ec.europa.eu/kosovo-report-2024_en

5. *Align Subsidies with Environmental Outcomes:* Condition a portion of farm subsidies on compliance with environmental practices, such as reduced fertilizer use, water-saving irrigation systems, or certified organic methods.
6. *Create a National Registry for Sustainable Agriculture Projects:* Establish a digital platform to track all pilot projects, research initiatives, and funding programs related to sustainable agriculture. Use the registry for monitoring and replication purposes.
7. *Improve Agri-Environmental Data Collection:* Task the Kosovo Statistical Agency with compiling annual data on pesticide and fertilizer use, farm energy consumption, and agricultural GHG emissions. Integrate this data into agricultural policy reporting.

4.10 Biodiversity

Kosovo's biodiversity remains under increasing pressure from habitat degradation, unregulated development, and insufficient enforcement of conservation legislation. Although the country has committed to several international frameworks – most notably the UN Convention on Biological Diversity (CBD) – national implementation remains fragmented and under-resourced. Protected area coverage remains below both global and EU biodiversity targets, and regulatory institutions lack the financial and technical capacity to monitor and safeguard natural habitats effectively.

Protected Area Status and Gaps

Kosovo has designated 11.5% of its territory as protected, well below the EU's 30% by 2030 target and the Aichi Biodiversity Target of 17% for terrestrial ecosystems. No areas are currently designated as "strictly protected" under IUCN categories I or II. Moreover, most protected zones lack approved management plans, dedicated staff, or adequate infrastructure for surveillance and maintenance.

- *Biodiversity loss continues within protected areas, driven by illegal construction, agricultural encroachment, and*

unmanaged tourism.

- *Hydropower plants within national parks often operate without comprehensive environmental assessments, undermining habitat integrity and disrupting water systems.*

Institutional Constraints

- The Kosovo Environmental Protection Agency (KEPA) is the lead authority on biodiversity monitoring and policy. However, its capacity is severely limited by understaffing, budgetary constraints, and lack of scientific and technical equipment.
- KEPA does not maintain a real-time biodiversity database or publish regular assessments of ecosystem health or species status.
- Coordination with municipalities is weak. Local governments lack mandates or expertise to develop and enforce biodiversity action plans.

Monitoring and Compliance Deficiencies

- Species monitoring is sporadic and limited to donor-funded projects. There is no national system for tracking species abundance, extinction risk, or habitat fragmentation.
- Invasive species management is not integrated into national conservation strategies, despite increasing risks to freshwater and terrestrial ecosystems.
- Environmental impact assessments (EIAs) do not include comprehensive biodiversity metrics, and mitigation measures are rarely monitored after project approval.

Regional Context

Kosovo lags behind other Western Balkan economies in biodiversity protection. For comparison:

- Albania protects 18.6% of its territory,
- Montenegro protects 14%,
- North Macedonia protects 8.9%,
- Serbia protects 7.7%, and
- Bosnia and Herzegovina protects only 3.6%⁴³.

Kosovo's position is middling in coverage, but falls behind in enforcement, ecosystem

43 Aspen Institute. 2021. Green Agenda for the Western Balkans: Road to Sustainable Economic Growth.

restoration, and participation in international conservation platforms.

financing through international biodiversity funds.

BGF Assessment and Recommendations

To align biodiversity governance with international standards and ensure long-term ecosystem resilience, Kosovo should adopt the following measures:

1. *Expand and Upgrade Protected Areas:* Increase the proportion of national territory under protection to at least 17% by 2027, with a target of 30% by 2030. Prioritize areas of high ecological value and designate a subset as strictly protected in line with EU Biodiversity Strategy requirements.
2. *Mandate Biodiversity Action Plans at Local Level:* Require municipalities with protected areas to develop and implement Local Biodiversity Action Plans (LBAPs). Provide technical assistance and financing through a dedicated biodiversity fund.
3. *Strengthen KEPA Capacity:* Increase KEPA's annual budget and staffing by at least 50% by 2026. Equip the agency with biodiversity monitoring tools, GIS capabilities, and species tracking systems.
4. *Develop a National Biodiversity Monitoring System:* Establish a centralized database to track key indicators such as species population trends, habitat conditions, and conservation outcomes. Publish annual biodiversity status reports accessible to policymakers and the public.
5. *Regulate Hydropower Projects in Protected Areas:* Prohibit new hydropower projects within protected zones unless full strategic environmental assessments are conducted. Require retrofit plans and compliance audits for existing facilities.
6. *Integrate Biodiversity into EIAs and Land Use Planning:* Revise EIA guidelines to include standardized biodiversity metrics and long-term habitat impact assessments. Require post-construction monitoring and reporting as a condition of project approval.
7. *Promote Ecosystem Restoration Projects:* Launch reforestation, wetland restoration, and habitat connectivity initiatives in degraded areas. Align projects with EU Green Deal priorities and seek co-

Despite adopting a series of foundational strategies and laws – including the Energy Strategy 2022–2031, the Law on Climate Change, and the forthcoming NECP – implementation remains far too slow and fragmented to meet the ambition of the Green Agenda for the Western Balkans or EU integration standards.

The gap between policy commitments and tangible outcomes must no longer be tolerated. Kosovo's sustainability agenda is at risk of stagnation without a focused and accountable push for implementation. This is not merely a technical challenge – it is a governance and equity imperative.

Implementation deficits, institutional under-capacity, and weak inter-ministerial coordination continue to undermine progress across all sectors. Energy market liberalization remains incomplete, while renewable energy projects face delays due to regulatory uncertainty and insufficient operational capacity. Climate policies exist, but enforcement is weak, with limited resources and unclear lines of accountability between institutions. The NECP must be adopted and used as a driver of systemic reform, not a bureaucratic exercise.

Environmental justice remains under-addressed. Inclusion and equity are still peripheral in green policymaking. Kosovo lacks a legal definition of energy poverty, leaving thousands of vulnerable households invisible in data and excluded from support schemes. Despite existing funds and project pilots, marginalized communities – rural residents, women, ethnic minorities – are rarely meaningfully involved in climate planning or benefit from green investments. This violates both the spirit and substance of the EU's "leave no one behind" principle.

Waste and water management reforms have begun, but without the technical and financial empowerment of municipalities, even the most advanced strategies will falter. Likewise, while agriculture contributes significantly to GDP and employment, it continues to rely on outdated, unsustainable practices. The sector

requires clear policy direction to align with climate resilience, biodiversity protection, and EU market standards.

Policy Priorities for Action

To close the widening implementation gap and deliver a just, inclusive transition, Kosovo's policymakers must act decisively on the following:

Action

- 1. Adopt and operationalize the NECP immediately**, with clear responsibilities, milestones, and annual progress reviews.
- 2. Institutionalize enforcement** by significantly increasing staffing and capacity at key agencies, particularly for environmental inspection, climate monitoring, and energy governance.
- 3. Legally define and track energy poverty** through the Kosovo Statistical Agency and develop targeted support schemes for vulnerable households within the NECP framework.
- 4. Mainstream inclusion into all climate and energy funding**, allocating dedicated percentages for women, youth, minorities, and persons with disabilities.
- 5. Empower municipalities with direct funding**, technical support, and inclusion mandates to implement local green initiatives effectively.
- 6. Develop a green finance roadmap**, integrating sustainability into public budgeting and ensuring climate accountability in all future capital investments.
- 7. Strengthen cross-sectoral governance** by creating high-level coordination bodies with a mandate to oversee Green Agenda delivery across ministries.

Lead Institution

Ministry of Economy

Ministry of Economy and Ministry of Environment,
Spatial Planning and Infrastructure

Ministry of Economy and Kosovo Statistical Agency

Ministry of Economy and Ministry of Environment,
Spatial Planning and Infrastructure

Ministry of Finance, Labour and Transfers

Ministry of Finance

Office of the Prime Minister

These recommended actions will strengthen our policy foundation, build human capacities for implementation and make sure our path to transition is inclusive. Kosovo's green transition will not succeed through policy declarations alone. It demands a deliberate reordering of priorities, institutions, and investments – anchored in inclusion, resilience, and long-term governance reform. Through initiatives for collaboration such as dialogue forums and policy reviews all stakeholders can make sure to voice their insights. Only then can the Green Agenda catalyze structural transformation aligned with EU and regional commitments. A successful Green Agenda must deliver not just on emissions, but on equity, resilience, and the right of every citizen to a clean, sustainable future.

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