



**MAPPING AND PRELIMINARY
ASSESSMENT OF THE SCALE AND
LOCATION OF *ILLEGAL WASTE
DUMPSITES* IN KOSOVO**

PRISTINA, MAY 2026

DISCLAIMER

This publication has been prepared as part of the small-scale project “*Environmental Crime - Supporting Actions to Enable Rule of Law (ROL) Effectiveness*”, funded by the European Union Rule of Law Mission in Kosovo (EULEX Kosovo) and implemented by EcoZ.

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EXECUTIVE SUMMARY

This report presents a field-based mapping and preliminary assessment of the scale and location of illegal waste dumpsites in Kosovo. **In total, 477 locations were surveyed, of which 379 were identified as illegal waste dumpsites.** The findings show that illegal dumping remains a persistent challenge, despite the existence of a legal and regulatory framework for waste management.

The data collected through field visits, GPS coordinates, photographic evidence and Google My Maps provides a practical basis for institutional follow-up, inspection, enforcement, clean-up prioritisation and public reporting. The report also highlights the need to treat illegal dumping not only as a waste management problem, but also as an environmental crime and rule of law concern, requiring coordinated action by Kosovo authorities including central institutions, municipalities, inspectorates, police, prosecutors, and waste companies, with civil society and Kosovo citizens playing an important role in awareness raising.

1. INTRODUCTION

This report presents a field-based overview of waste management in Kosovo, with a particular focus on illegal waste dumpsites.^[1] It is a preliminary field assessment of waste disposal practices and their environmental impacts, including recommendations for future action.

The report has been prepared within the framework of the small-scale project “*Environmental Crime - Supporting Actions to Enable Rule of Law Effectiveness*”, funded by the European Union Rule of Law Mission in Kosovo (EULEX Kosovo), aiming at contributing to address environmental crimes in Kosovo, by increasing access to information on environmental violations by relevant authorities, empower civil society as agent of change and by raising awareness of environmental crimes across the Kosovo population.

The report includes desk research of Kosovo’s legal and regulatory framework in relation to waste management (Chapter 3 and more information in Appendix 2). It portrays the primary and secondary legislation and regulatory framework governing waste management related to the prevention, identification, and management of illegal waste dumpsites. The desk research also includes an outline of responsible institutions and their respective mandates, roles, and responsibilities in waste management (Appendix 3). Finally, the desk research outlines investments over the years in the development of waste management in Kosovo (Appendix 4).

The findings from the 2026 field assessment are outlined in Chapter 4 –including the identification and mapping of main illegal waste dumpsite locations across Kosovo – and a comparison with 2023 data,^[2] alongside, where relevant, with 2019 data, in accordance with reports published by the Kosovo Environmental Protection Agency (KEPA).

Through this comparison, the report highlights not only the scale and location of illegal waste dumpsites, but also trends related to newly created, existing, removed, and inaccessible sites. From an environmental crime perspective, this comparison is important because it helps identify repeated dumping patterns, locations where illegal activity continues over time, areas where new sites appear near to cleaned sites, and municipalities where institutional prevention and enforcement may require stronger attention. In the end, the report presents conclusions and recommendations based on desk research, field data, and EcoZ analysis.

The illegal waste dumpsites documented during the field assessment are presented in an interactive Google Maps layer - accessible [HERE](https://sites.google.com/eco-zone.org/waste-dumpsites-26/home?authuser=5) (<https://sites.google.com/eco-zone.org/waste-dumpsites-26/home?authuser=5>). Each site includes key information such as coordinates, photographs, waste type, estimated size, site status and risk indicators. This tool can support central and local institutions in identifying priority sites, strengthening inspection processes, planning follow-up actions, and improving fact-based decision-making in waste management.

^[1]For the purpose and consistency of this report, **illegal waste dumpsites** refer to unauthorised locations where waste is disposed of outside the formal waste management system, without approval, control or environmental protection measures. The term **landfill** is used only for licensed or formally managed waste disposal facilities. For more glossary, see Appendix 1.

^[2]Ministry of Environment, Spatial Planning and Infrastructure, REPORT MUNICIPAL WASTE MANAGEMENT IN KOSOVO 2023-2024, Pristina, 2025. <https://www.ammk-rks.net/assets/uploads/files/ENG%20Raporti%20per%20gjendjen%20e%20mbeturinave%20ne%20Kosove%202023-2024.pdf>

It should also be noted that illegal dumpsites may affect communities differently. Children, elderly persons, persons with disabilities, low-income families and communities living close to dumpsites may face higher exposure or have fewer opportunities to avoid environmental and health risks. Children may be more vulnerable to polluted air from burned waste, contaminated soil and unsafe play areas, while elderly persons and persons with chronic health conditions may be more affected by degraded environment, such as poor air and water quality, that may be attributed to the illegal waste dumps in the short, medium or long term. For these reasons, illegal dumpsite prevention and clean-up should be planned not only as an environmental measure, but also as a public health and social protection priority.

Overall, the initiative further seeks to pilot a sustainable and replicable pollution management model, while strengthening public awareness and civic engagement, by encouraging citizens to report environmental crimes, contributing to environmental protection, and collaboration with relevant institutions. Therefore, the report should be understood not only as a technical assessment of illegal waste dumpsites, but also as a practical tool for institutional follow-up. Its findings can support central-level institutions, municipalities, KEPA, inspectorates, law enforcement bodies, prosecutors, waste companies, civil society, and development partners in identifying where intervention is most needed and how illegal dumping can be addressed more effectively as an environmental, public health, and rule of law concern.

2. METHODOLOGY

The report is based on a combined methodology of desk research and fieldwork.

Prior to the fieldwork, from November 2025 to January 2026, a desk research was carried out to review available reports, identify potential illegal waste dumpsite locations, select the field assessment methodology, and define the basis for comparison with previous data, particularly from 2023 and, where relevant, 2019. Additionally, through the desk research, EcoZ analysed the relevant legal and regulatory framework in Kosovo, and it reviewed publicly available institutional reports and relevant project reports, as well as data and information on recent investments in the waste management sector.

During the preparatory phase for the field assessment, EcoZ also cooperated in testing and refining the data collection methodology with the Glllogoc/Glogovac based NGO Center for Education and Development of Environment (CEDE), in light of their extensive experience in data collection on waste. This cooperation helped ensure that the field assessment approach was practical, comparable with previous datasets, and suitable for documenting illegal waste dumpsites across Kosovo. As part of the methodology, the EcoZ team made efforts to reach out to selected municipalities, and throughout the assessment held several discussions with relevant stakeholders to gather additional insights on illegal waste dumpsites, institutional challenges and possible follow-up actions. In particular, EcoZ held consultations and meetings with relevant institutions and stakeholders, including KEPA and German Agency for International Cooperation (GIZ), to better understand the current waste management context, available data and ongoing sector developments, while also sharing notes with other civil society organisations, in order to identify relevant locations and local concerns.

The fieldwork was conducted from 12 January to 20 May 2026 in the following municipalities: Pristina, Fushë Kosovë/Kosovo Polje, Obiliq/Obilić, Mitrovica South, Mitrovica North, Lipjan/Lipljan, Ferizaj/Uroševac, Kamenicë/Kamenica, Gjilan/Gnjilane, Pejë/Peć, Gjakovë/Đakovica, Prizren, Zvečan/Zveçan, and Leposavić/Leposaviq, and it was used to collect primary data on the current situation of illegal waste dumpsites, including their location, characteristics, and potential environmental risks. Moreover, representatives from EULEX joined EcoZ during field visits in Pristina and Ferizaj/Uroševac.

Field data collection included:

- Determining the status of each dumpsite as new, previously existing, or removed;
- Recording the geographic coordinates of each dumpsite;
- Assessing the size of the dumpsite;
- Identifying the type of dumpsite;
- Identifying potential environmental and public health risks; and
- Collecting photographic evidence for each dumpsite.

The field data was compiled into a map created through Google My Maps, enabling more efficient data collection, better visualisation of locations, and broader territorial coverage across Kosovo.

2.1 METHODS USED TO COLLECT INFORMATION ON ILLEGAL WASTE DUMPSITES

Field data collection was completed over the period 12 January to 20 May 2026. The data collection was carried out through direct field surveying of suspected and previously identified illegal dumpsites. The methodology followed European Environment Agency (EEA)-aligned waste data collection principles, focusing on the systematic verification of sites and the collection of comparable information on their status, size, and waste composition.

Field visits to suspected illegal dumpsites were guided by historical data drawn from the *KEPA Report: Municipal Waste Management in Kosovo 2023-2024*,^[3] and from GIZ and CEDE's *Identification of Illegal Landfills in the Territory of the Republic of Kosovo 2019*.^[4] GPS data files from these reports were provided by the relevant organizations and mapped using the Google My Maps tool.

Locations were mapped for the following 14 municipalities: Pristina, Fushë Kosovë/Kosovo Polje, Obiliq/Obilić, Mitrovica South, Mitrovica North, Leposavić/Leposaviq, Lipjan/Lipljan, Ferizaj/Uroševac, Kamenicë/Kamenica, Gjilan/Gnjilane, Pejë/Peć, Gjakovë/Đakovica, Prizren, and Zvečan/Zveçan. Municipalities were selected for mapping, in order to prioritise major cities, while also providing broad geographical coverage of all regions.

Field data collection involved traveling to each of the points where an illegal dumpsite existed, according to the 2023 report. Any new illegal waste dumpsite locations encountered along the route to these known locations were also mapped.

It should be noted that the data file provided for 2023 did not include data for Gjakovë/Đakovica, although that municipality was assessed in that report. As such, for this municipality the data from the 2019 report was used instead. Hereafter, this report will refer to historical comparisons to 2023, but for Gjakovë/Đakovica, the comparison is to 2019 instead.

Data was collected using a Google Form (Survey), which is provided in Appendix 5.

- **Geographic Coordinates** (in decimal degrees, recorded using iPhone GPS or DJI 4 Mini Combo drone GPS system);
- **Size** of the dumpsite by volume of waste contained, in 200 L garbage bag equivalents, as determined by visual estimate: small (1 - 5 garbage bags); medium (6 - 20 garbage bags); large (>20 garbage bags);
- **Type of waste contained:** municipal/household waste, construction/demolition waste, industrial/hazardous waste,^[5] or other;

^[3]Report on Municipal Waste Management in Kosovo, 2025.
<https://www.ammk-rks.net/assets/cms/uploads/files/ENG%20Raporti%20per%20gjendjen%20e%20mbeturinave%20one%20Kosove%2>

^[4]Identification of Illegal Landfills in the Territory of the Republic of Kosovo, 2019, Page 24.

<https://cede-ks.org/wp-content/uploads/2020/08/Raport-Identifikimi-i-deponive-ilegale-n-C3%AB-territorin-e-R.-t-C3%AB-Kosov-C3%ABs.pdf>

^[5]Hazardous waste is a dangerous substance or liquid that can degrade the environment by polluting the air, soil and/or groundwater, can be expensive and difficult or impossible to remove, and it poses a risk to human health or the environment due to its chemical, biological, toxic, flammable, corrosive or other dangerous properties, thus increasing the mortality risk of human population.

- **Dumpsite status:**

- Existing (2023 or 2019 illegal dumpsite location where a dumpsite still exists);
 - New;
 - Removed since 2023;
 - Inaccessible (these were later assessed by satellite imagery, see below)
- Any potential **nearby sensitive environments or potentials for environmental hazards**, such as proximity to water bodies, proximity to inhabited houses, proximity to major roadways, or location within a national/municipal park or wilderness area;
- Identification of certain illegal waste dumpsites based on the Google Maps satellite imagery (91 locations);
- Photographic evidence of each dumpsite [Figure 2.1]^[6].

The classification of sites by size and waste type allows comparison with previous years and supports prioritization of clean-up, inspection and enforcement measures. This approach is consistent with Kosovo's previous municipal waste reporting practice, where illegal dumpsites were identified through field research and categorized by size and type of waste. While the vast majority of illegal dumpsites were identified through physical visits, for some areas, the locations where illegal dumpsites were documented in 2023 were not visited due to issues such as road closures, deteriorated road conditions, or scheduling problems.

In these cases, the status of the dumpsites was assessed using Google Maps satellite imagery; therefore, information on size, type of waste contained, nearby sensitive environments, and photographic evidence were not collected for these dumpsites. Moreover, the use of the satellite identification method also precludes the possibility of identifying new illegal dumpsites along the way to known locations in these municipalities (when this occurred, it is specified in the point description in Google My Maps). For example, a large number of the dumpsites in Leposavić/Leposaviq, Lipjan/Lipljan, and Zvečan/Zveçan were assessed in this manner. As such, results for Leposavić/Leposaviq, Lipjan/Lipljan, and Zvečan/Zveçan should be considered preliminary.

^[6]In a small number of cases, technical difficulties led to the deletion of photographs. Additionally, in some cases dumpsite status was assessed using satellite imagery rather than a physical visit to the site. These cases are detailed on the map, in the description of the points in question.

Fig. 2.1 - Sample photographs from field data collection; clockwise from top left: site in Lipjan/Lipljan captured by drone; site in Pristina municipality along M2 Highway; site adjacent to Trepça/Trepča Mine in Mitrovica South; site along the Morava e Binçës/Binačka Morava River in Kamenicë/Kamenica



3. DESK RESEARCH

3.1 LEGAL AND REGULATORY CONTEXT

Kosovo has a legal and institutional framework regulating waste management, including waste prevention, collection, transport, treatment, disposal, monitoring, and institutional responsibilities. The main responsibilities are divided between central-level institutions and municipalities.

At the central level, the key institution responsible for waste management policy, legislation and strategic planning is the **Ministry of Environment and Spatial Planning**, through its relevant departments and divisions. **The Kosovo Environmental Protection Agency (KEPA)** plays an important role in environmental monitoring, data collection and reporting on the state of waste management in Kosovo. Other relevant institutions include environmental inspectorates, Kosovo Police and justice institutions, particularly in cases where illegal dumping may constitute an environmental violation or environmental crime.

At the local level, **municipalities** have a central role in organising waste management services, preparing municipal waste management plans, identifying and removing illegal waste dumpsites, informing the public, raising awareness and ensuring local-level monitoring. In practice, waste collection and transport are mainly carried out through **Regional Waste Companies**, while licensed landfill management and disposal infrastructure are managed by the **Kosovo Landfill Management Company** and other authorised operators.^[7]

^[7]More information on the desk research including legal and regulatory framework in Kosovo, institutions responsible for waste management and investments in the waste management sector can be found in Appendix 2.

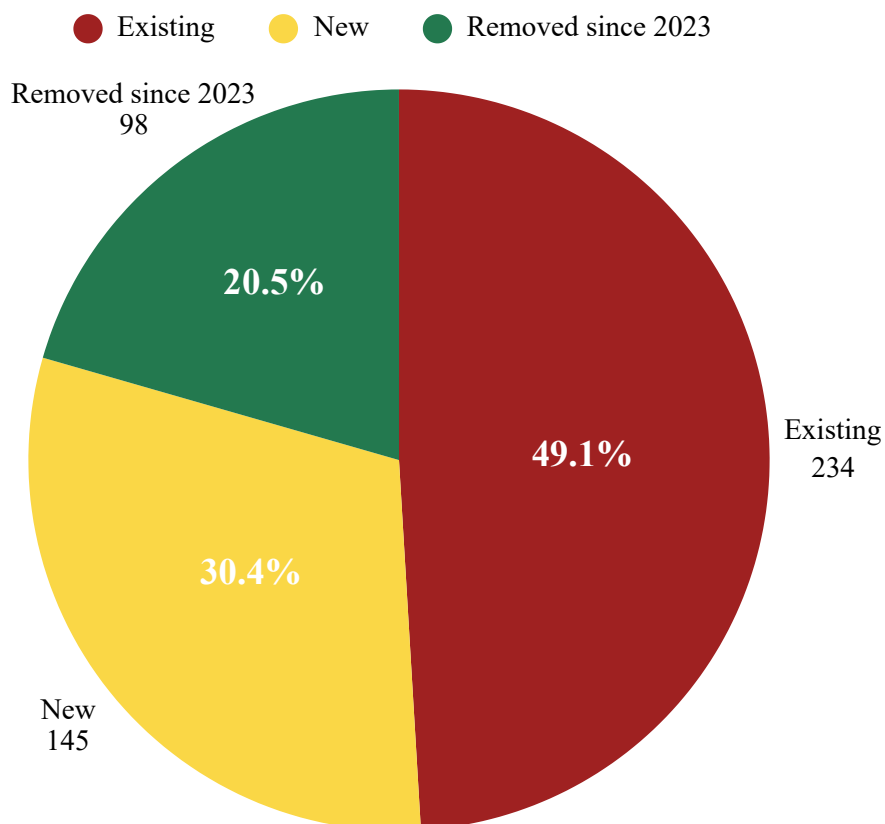
4. FIELD ASSESSMENT - RESULTS

The field assessment covered 477 locations across selected municipalities in Kosovo, of which 379 were identified as illegal dumpsites in 2026.

Of the identified sites, 234 were previously existing locations, while 145 were newly identified sites. At the same time, 98 locations recorded as illegal dumpsites in 2023 have since been removed (Figure 4.1), showing that progress has been made in some areas; however, removal efforts are not yet sufficient to prevent the re-emergence or creation of new illegal dumpsites.

The Figure 4.1 represents both past and present 477 surveyed illegal waste dumpsite locations from the 14 municipalities analysed for this report [from Table 1: the current dumpsites in 2026 (379 locations) and the removed dumpsites from 2023 (98 locations)].

Fig. 4.1 - Illegal waste dumpsites by status



Out of all the municipalities surveyed, the largest number of locations was recorded^[8] in Lipjan/Lipljan municipality (135 locations, out of which 106 were current dumpsites), followed by Gjilan/Gnjilane (63 locations, 56 current dumpsites) and Gjakovë/Đakovica (54 locations, 37 current dumpsites)[Table 4.1]. The number of locations recorded in the other municipalities surveyed ranged from 13 to 40.

^[8]The number of assessed locations reflects the baseline points available from previous datasets and additional sites identified during fieldwork. It should therefore be interpreted as part of the assessment scope, not only as a direct ranking of municipal performance.

Table 4.1 - Status of illegal waste dumpsite locations by municipality and the change over time in number of illegal waste dumpsites

Municipality	Identified in 2023	Removed since 2023	New in 2026	Identified in 2026	Change in dumpsites	Local Waste Action Plan
Ferizaj/Uroševac	11	-2	6	15* (1 by satellite)	+4	+
Fushë Kosovë/ Kosovo Polje	8	0	8	16	+8	-
Gjakovë/Đakovica	47	-17	7	37	-10	+
Gjilan/Gnjilane	49	-7 (1 by satellite)	14	56* (5 by satellite)	+7	-
Kamenicë/Kamenica	10	-1	11	20* (2 by satellite)	+10	+
Leposavić/ Leposaviq	39	-22* (18 by satellite)	1	18* (14 by satellite)	-21	-
Lipjan/Lipljan	88	-29* (14 by satellite)	47	106* (16 by satellite)	+18	+
Mitrovica North	9	-2	2	9	+0	+
Mitrovica South	9	-1	13	21	+12	+
Obiliq/Obilić	7	0	6	13	+6	+
Pejë/Peć	11	0	6	17* (1 by satellite)	+6	+
Pristina	6	-2	12	16	+10	+
Prizren	12	-2	10	20	+8	+
Zvečan/Zveçan	26	-13* (11 by satellite)	2	15* (8 by satellite)	-11	-
Totals	332	-98* (44 by satellite)	145	379* (47 by satellite)	+47	9/14 (64%) has waste action plan

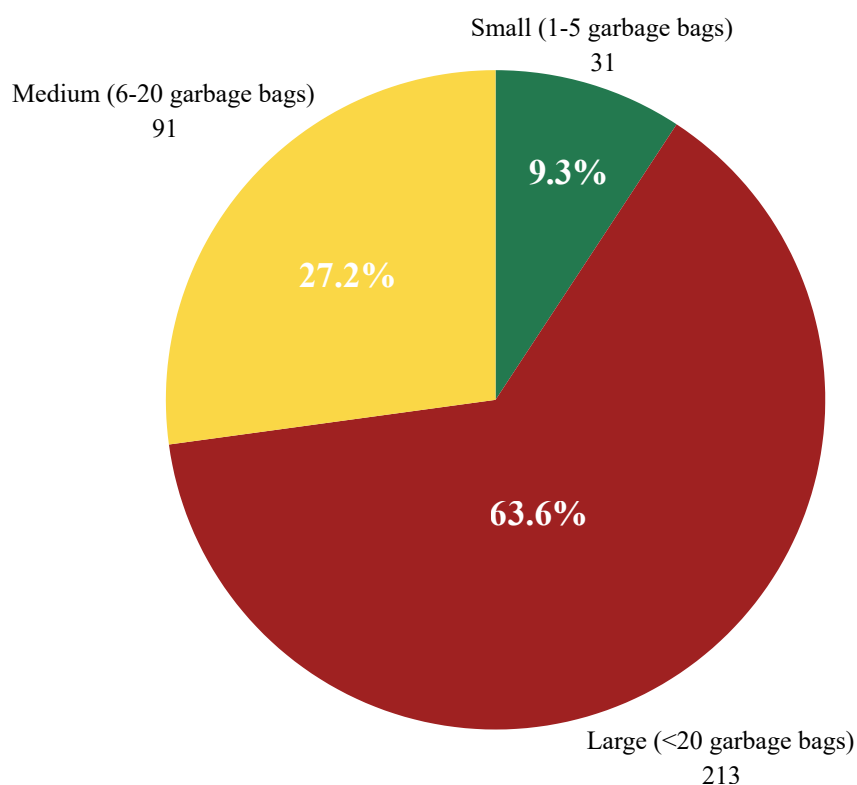
**In the brackets is the number of illegal dumpsites identified through Google Maps satellite analysis, which is included into the total for this municipality*

From Table 4.1 we can see that in 10 of the surveyed 14 municipalities, the number of recorded dumpsites increased from 2023 to 2026, while in three municipalities it decreased, and in one it remained the same. The largest decreases were in Leposavić/Leposaviq/ (-21) and Zvečan/Zveçan (-11). However, as discussed in the methodology section, these municipalities were surveyed primarily by satellite imagery, due to access limitations, road conditions and fieldwork constraints, which is less reliable than physical assessment. Therefore, the findings from these municipalities should be interpreted as preliminary. Of the municipalities which were surveyed by field visits, Gjakovë/Đakovica was also the only one with a smaller number of dumpsites since the last survey (-10), however the last available data for Gjakovë/Đakovica was from 2019 rather than 2023, so this change took place over a longer period of time (data for 2019 not included in Table 4.1). Mitrovica North had no change in the total number of illegal dumpsites recorded. This is not due to the situation being static: rather, two illegal dumpsites in this municipality have been removed since 2023, and two new illegal dumpsites were recorded during this survey. The largest increase in illegal dumpsites was in Mitrovica South (+12), followed by Pristina and Kamenicë/Kamenica (both +10) [Table 4.1].

Table 4.1 also indicates which municipalities have Local Waste Action Plans (LWAP). The LWAPs are obligatory documents and key instruments for translating central-level waste management policies into local action. The existence of LWAP helps the municipality’s planning capacity, budget orientation, and preparedness to prevent, monitor and address illegal waste dumpsites.

The majority of the illegal dumpsites were large in size (63.6%). 27.2% were medium, and 9.3% were small [Figure 4.2]. Please note that we use 200 litre bags as our measurement unit. Five full 200 litre bags are equal to 1 cubic meter of waste. The size classification used here is based on previous reports from 2019 and 2023. In chapter 4.2 below we will discuss briefly that the "large" classification should have an additional class of “extra large” in future studies [Figure 4.2].

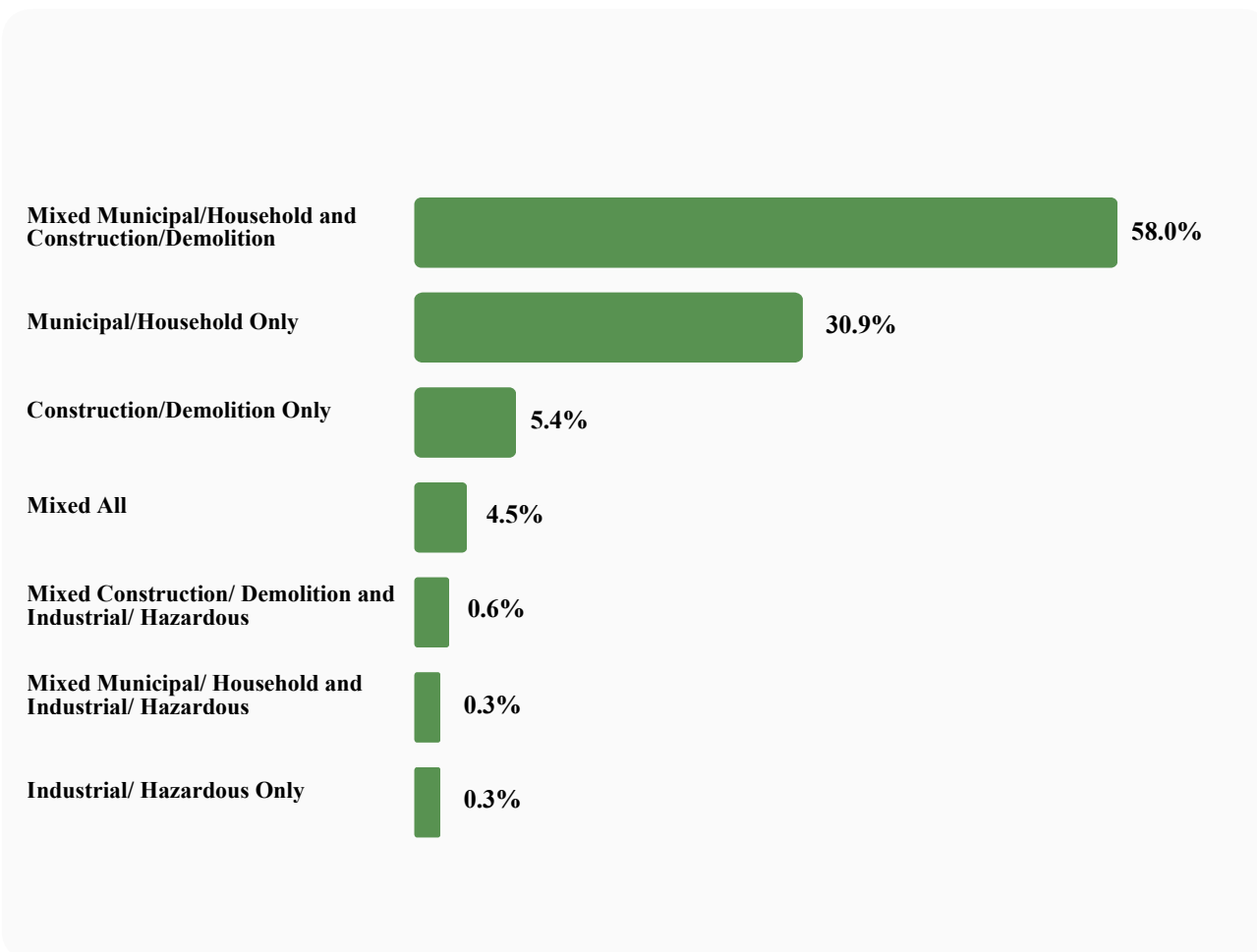
Fig. 4.2 - Illegal waste dumpsites by size



The Figure 4.3 illustrates that illegal dumpsites in our study can be classified into three main categories based on waste content, except for the 35 dumpsites that were identified through satellite imagery and we do not have a field assessment of the waste composition. The vast majority of illegal dumpsites (93.8%) contained municipal and household waste, followed by construction and demolition waste (68.5%), with a smaller percentage (5.9%) containing industrial and hazardous waste.

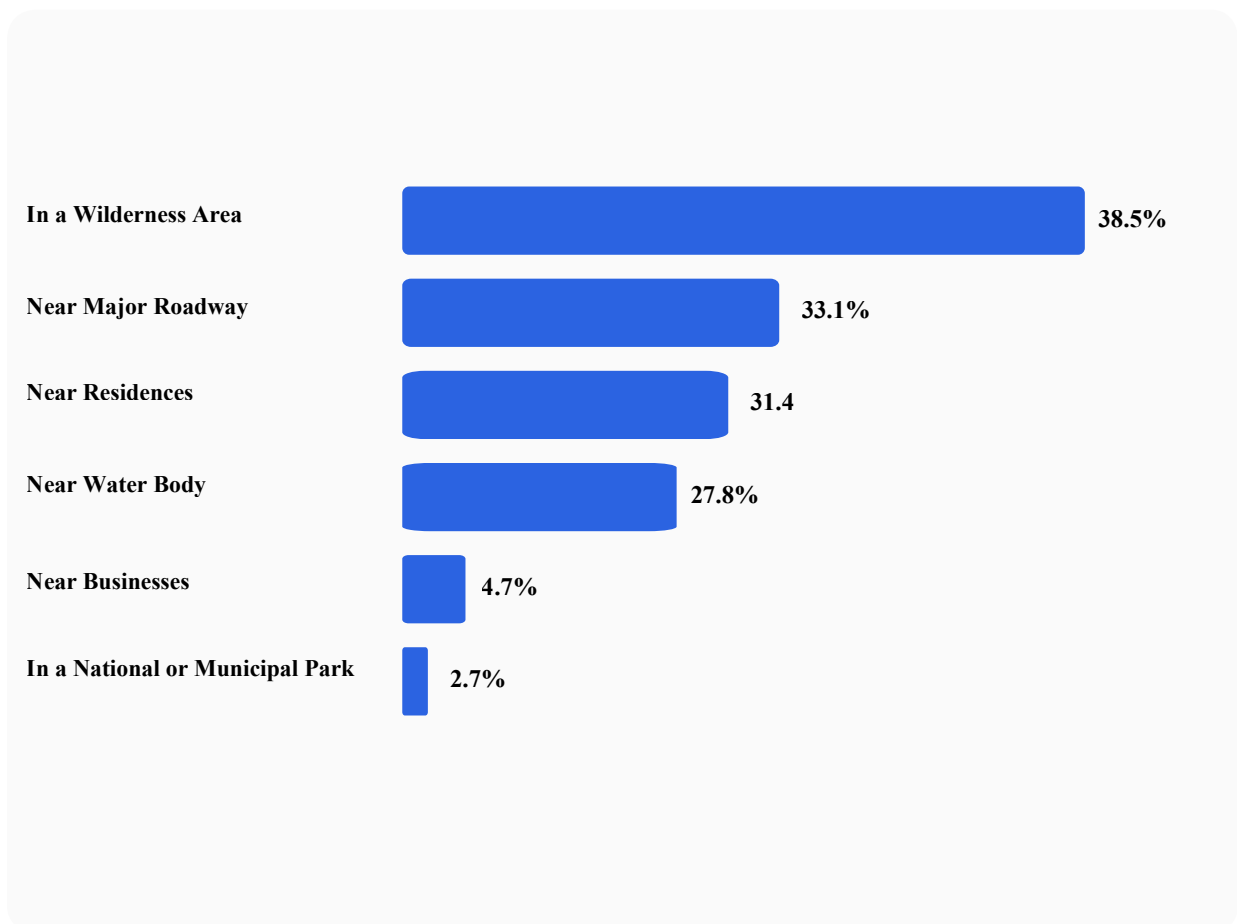
Most dumpsites contained a mix of municipal/household and construction/demolition waste (58.0%). In addition, 30.9% of sites contained municipal/household waste only, while 5.4% contained construction and demolition waste only. Industrial or hazardous waste was identified as obviously present in 5.9% of dumpsites; one site contained only this type of waste, while 19 sites contained industrial or hazardous waste mixed with other waste types. All dumpsites where industrial or hazardous waste was easily identified were located in Mitrovica South, Lipjan/Lipljan, or Zvečan/Zvečan municipalities.

Fig. 4.3 - Illegal waste dumpsites by type of waste contained



The figure 4.4 shows the percentage of illegal waste dumpsites in terms of location and potential environmental risk. From the figure 4.4., we can see that 38.5% of illegal dumpsites were located in wilderness areas, or natural areas without nearby human habitation. A further 33.1% were located near major roads, 31.4% near residential areas, and 27.8% near water bodies. Smaller shares were located near businesses (4.7%) or within national parks or municipal parks (2.7%) [Figure 4.4].

Fig. 4.4 - Potential environmental hazards in the vicinity of illegal dumpsites

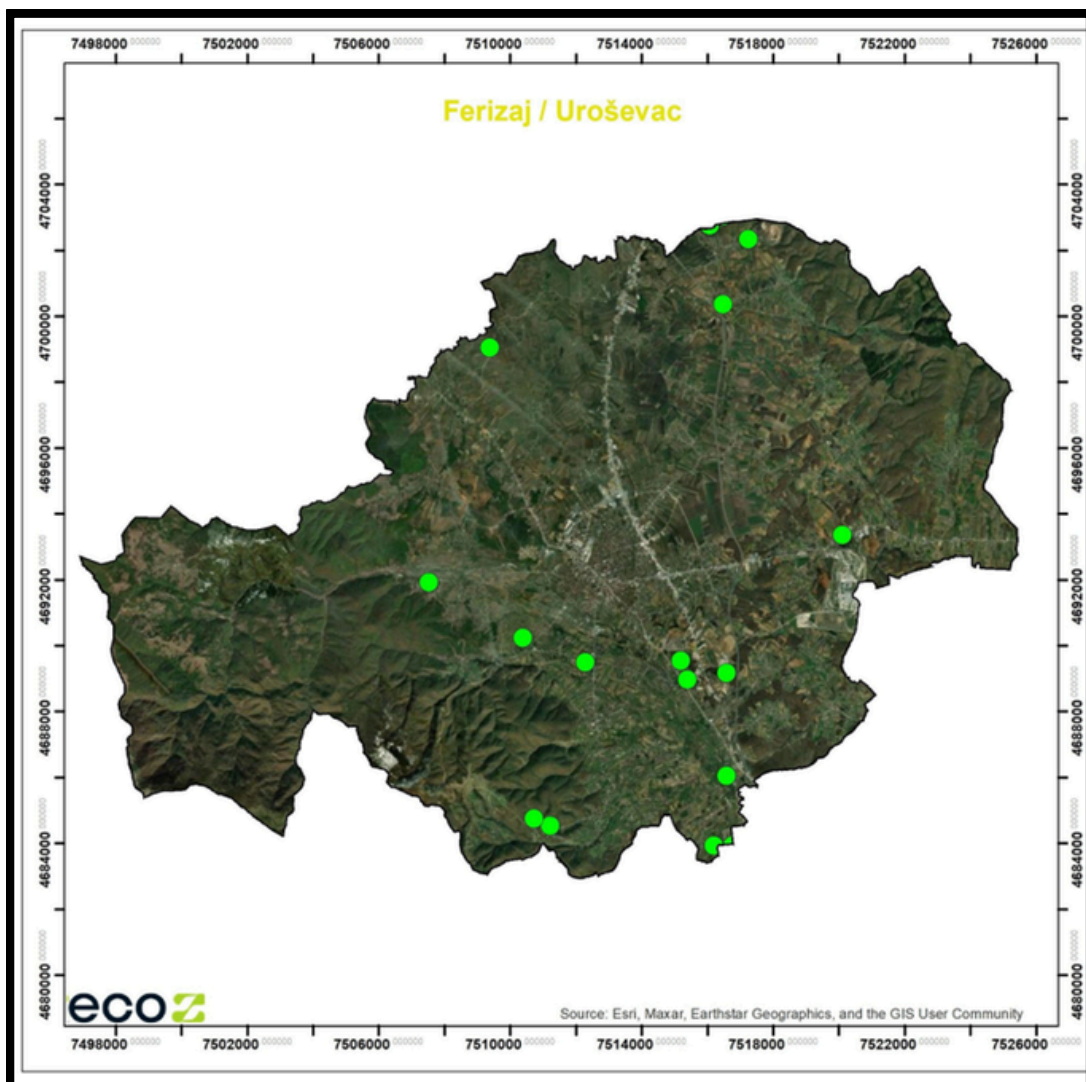


4.1 MAPS OF ILLEGAL WASTE DUMPSITES IN 2026

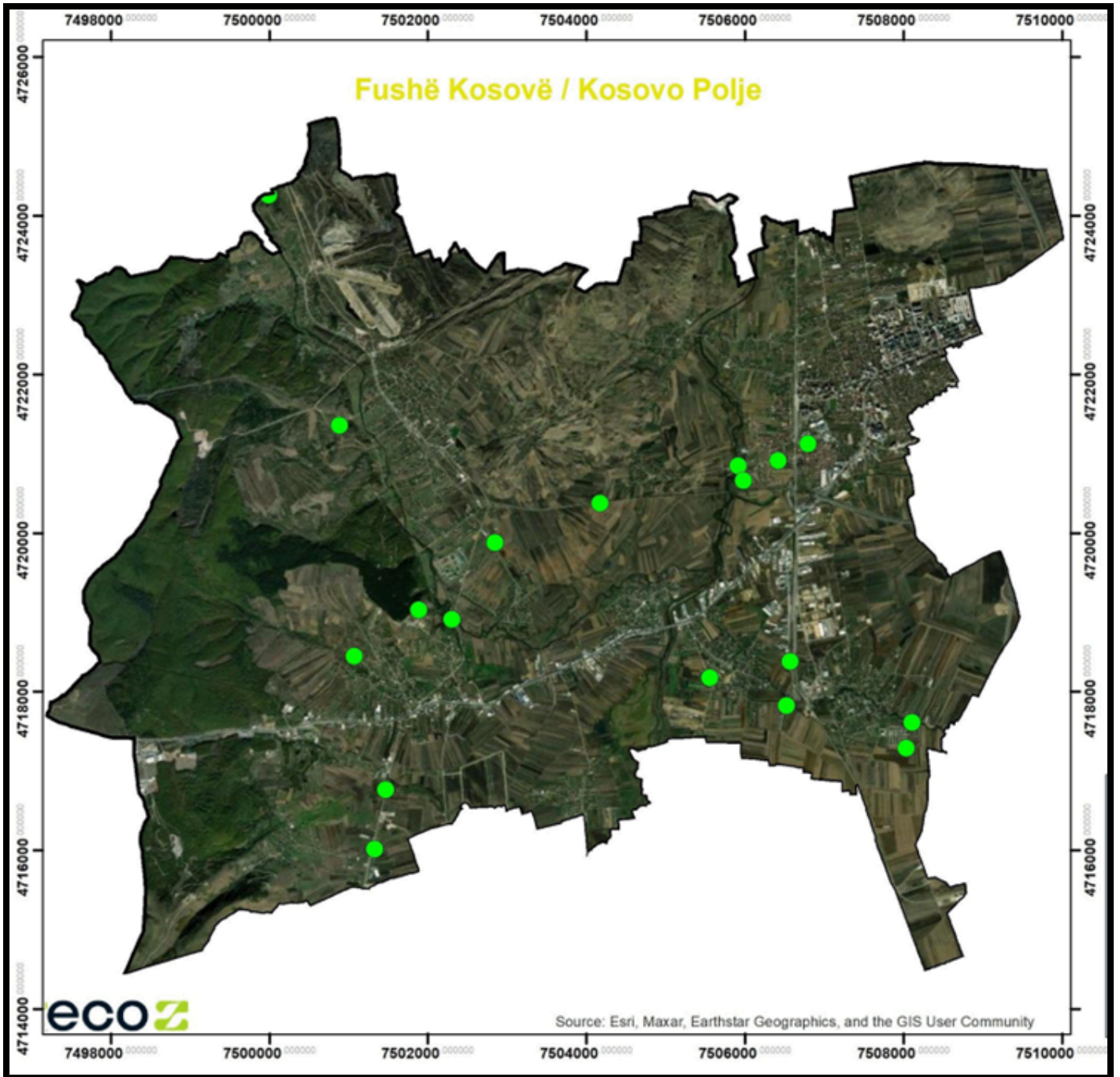
The maps presented in this section were developed using the field data collected during the assessment, including geographic coordinates, site status and other relevant information for each documented illegal waste dumpsite. The data were first organised through Google Maps/Google My Maps and then processed using GIS tools to produce clearer visual maps for the report.

The maps presented below do not include the dumpsites removed since 2023, nor do they include the dumpsites outside of the 14 municipalities analyzed in this report. The maps below do include dumpsites identified from satellite imagery. The version in Google My Maps includes all of these categories, with removed dumpsites color-coded green for clarity. These maps help illustrate the spatial distribution of illegal waste dumpsites across the assessed municipalities and support easier identification of priority areas for institutional follow-up, inspection and intervention.

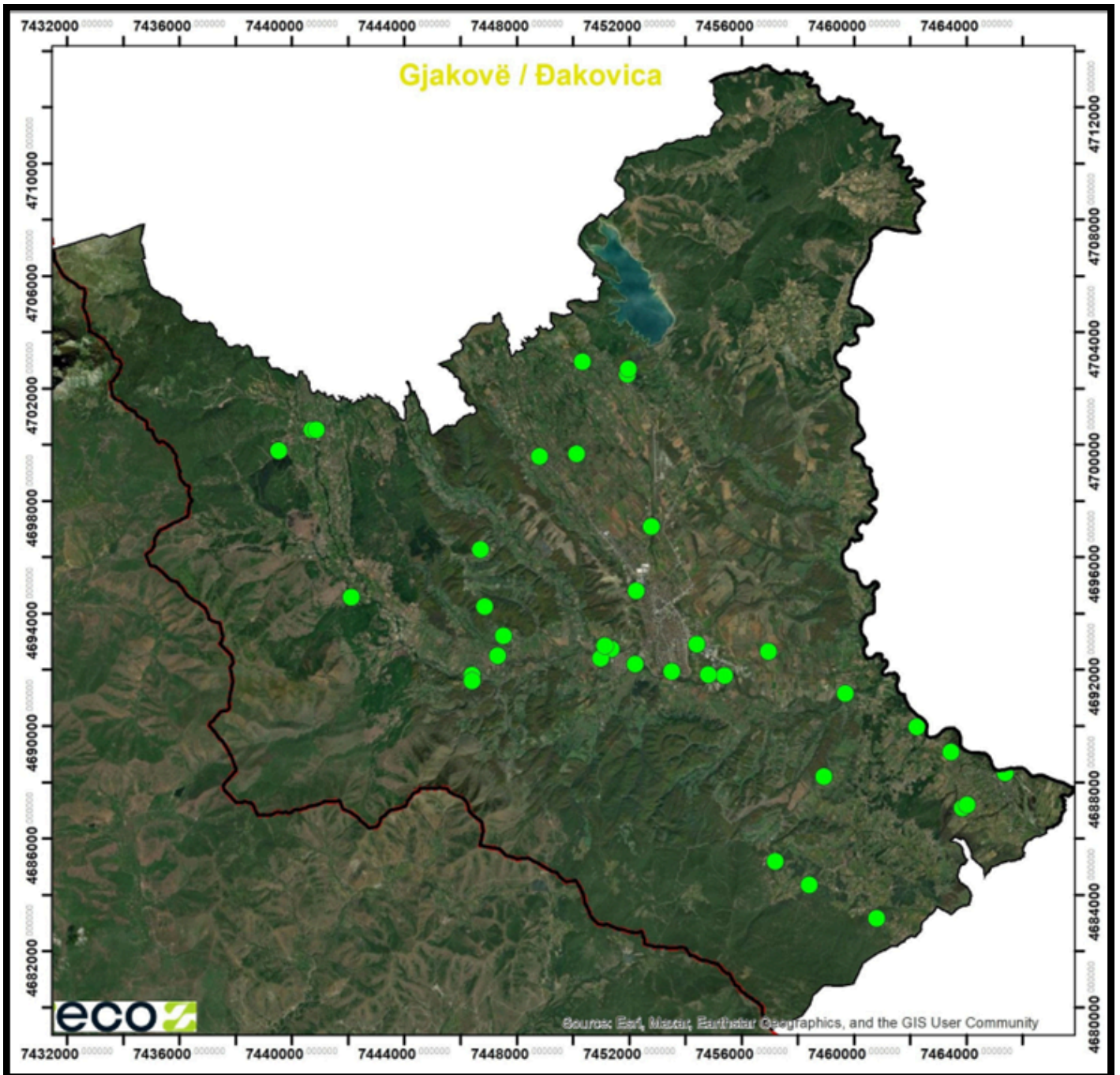
Map 4.1 - Ferizaj/Uroševac



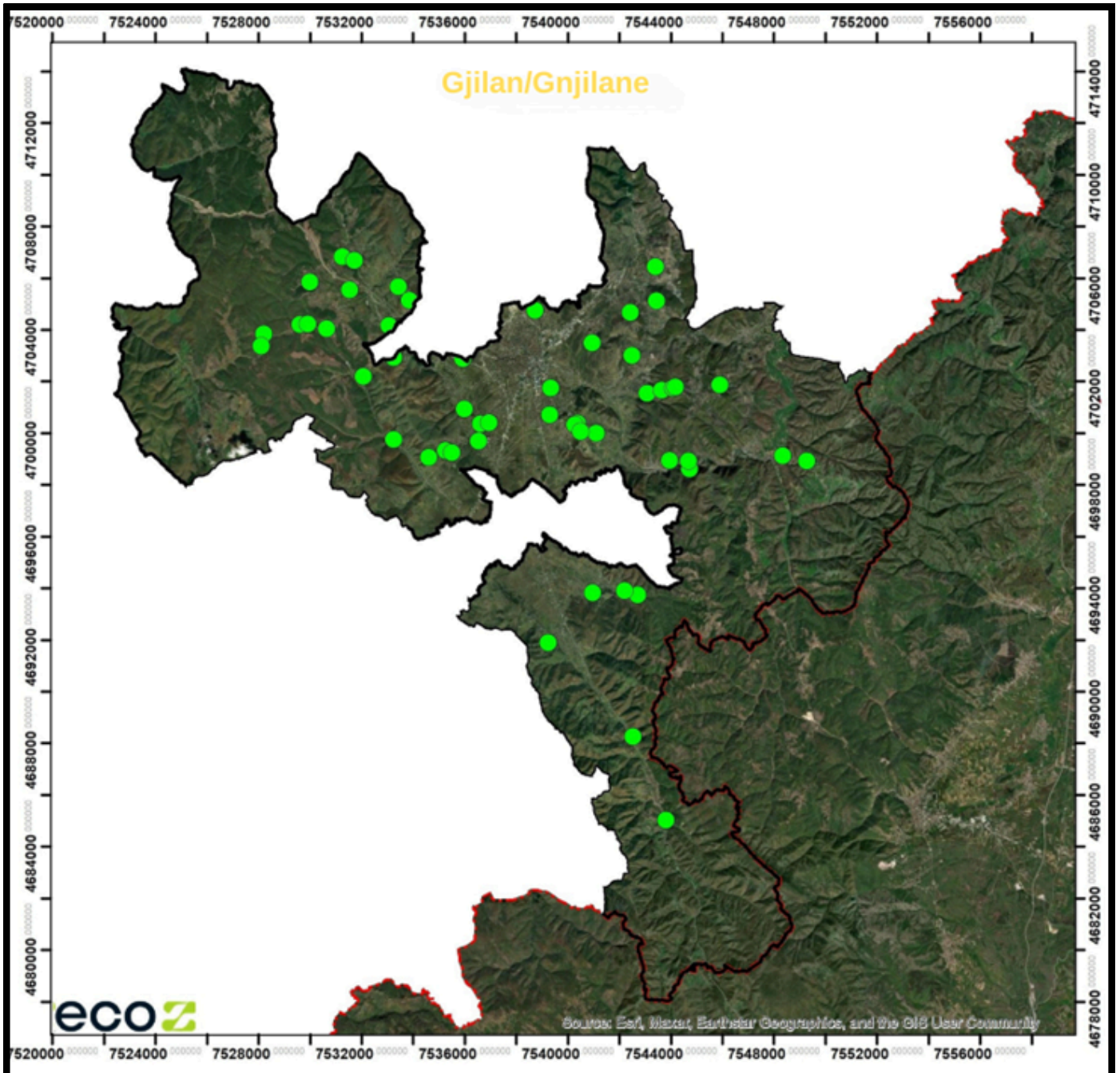
Map 4.2 - Fushë Kosovë/Kosovo Polje



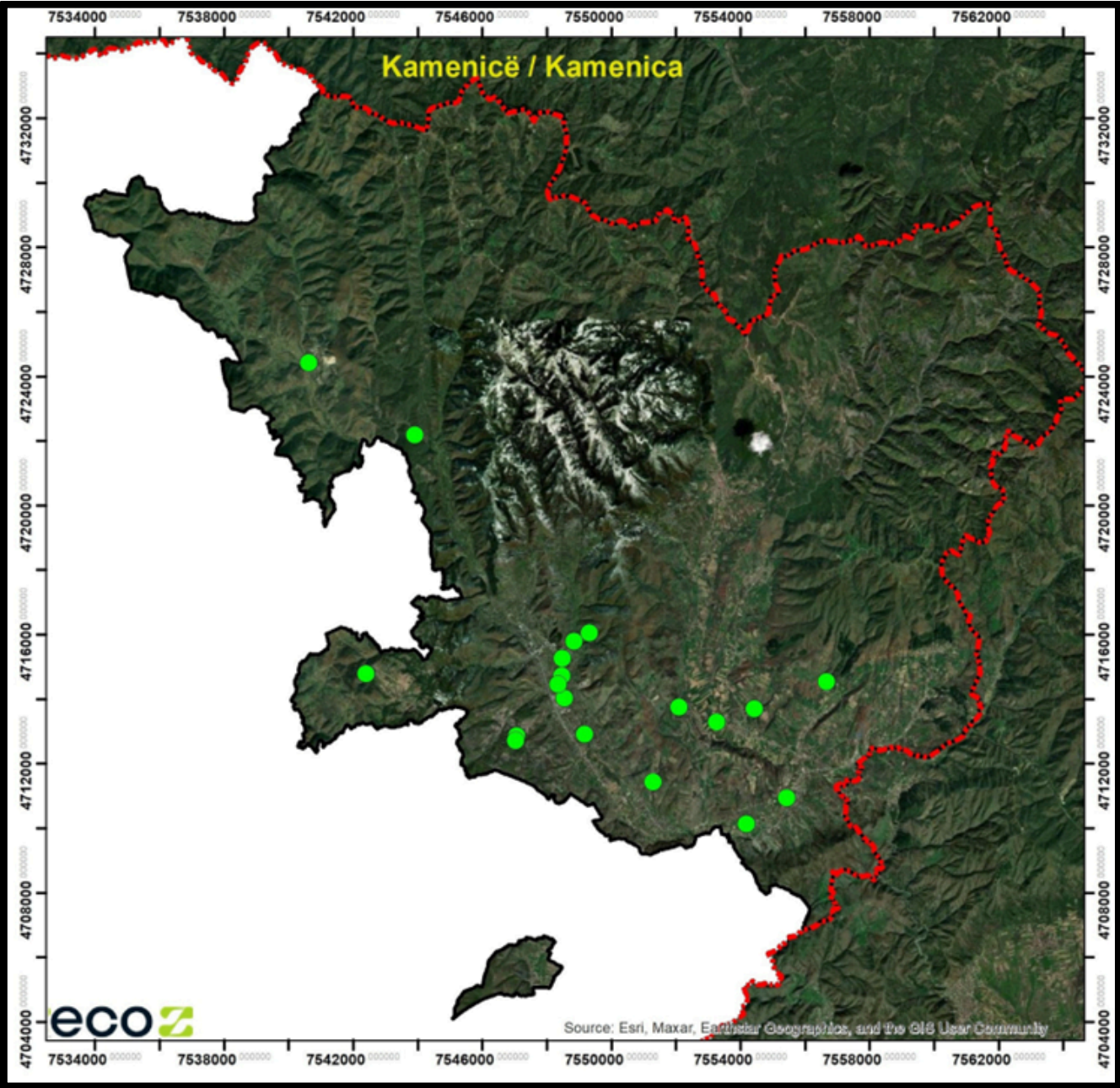
Map 4.3 - Gjakovë/Đakovica



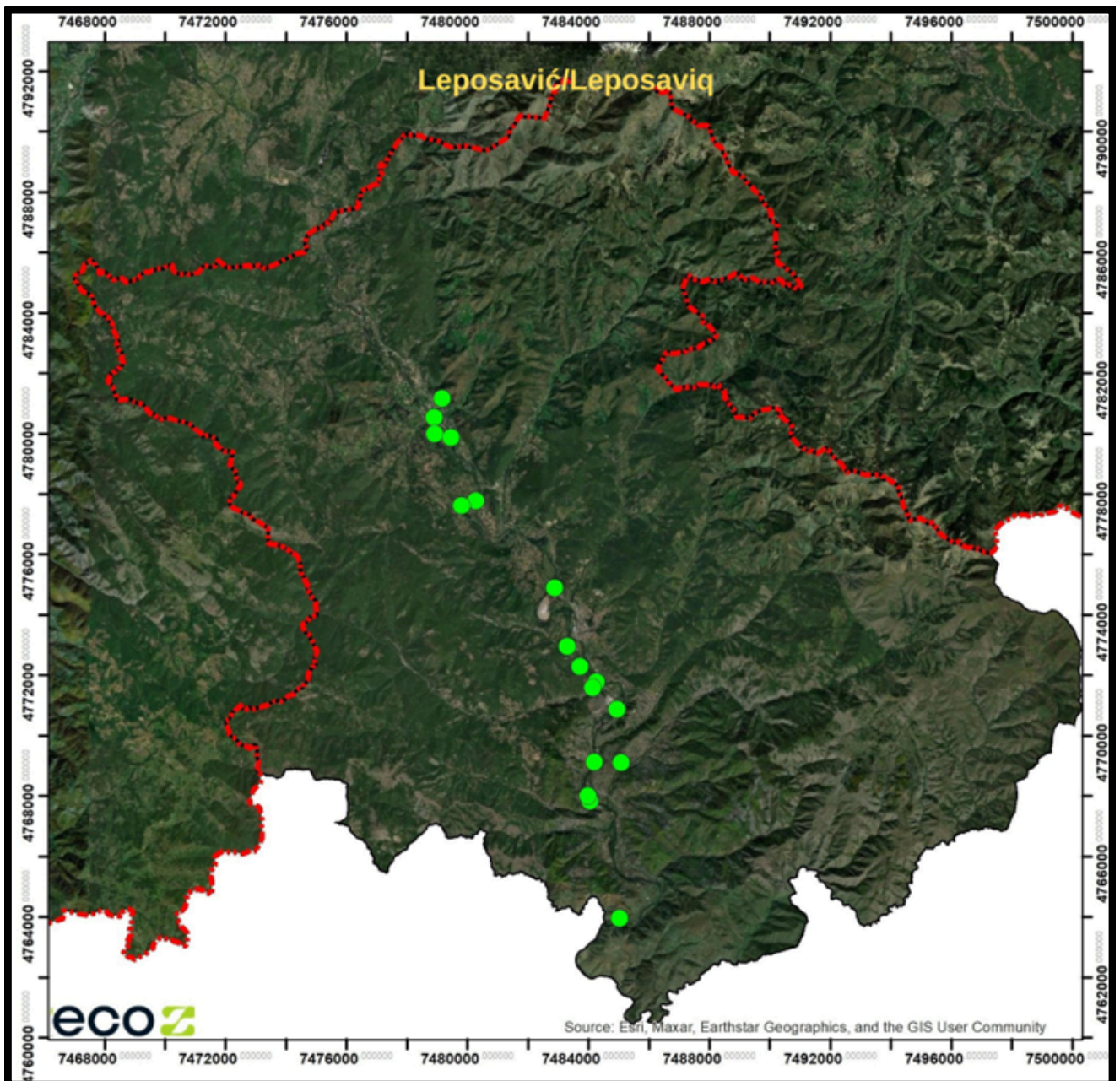
Map 4.4 - Gjilan/Gnjilane



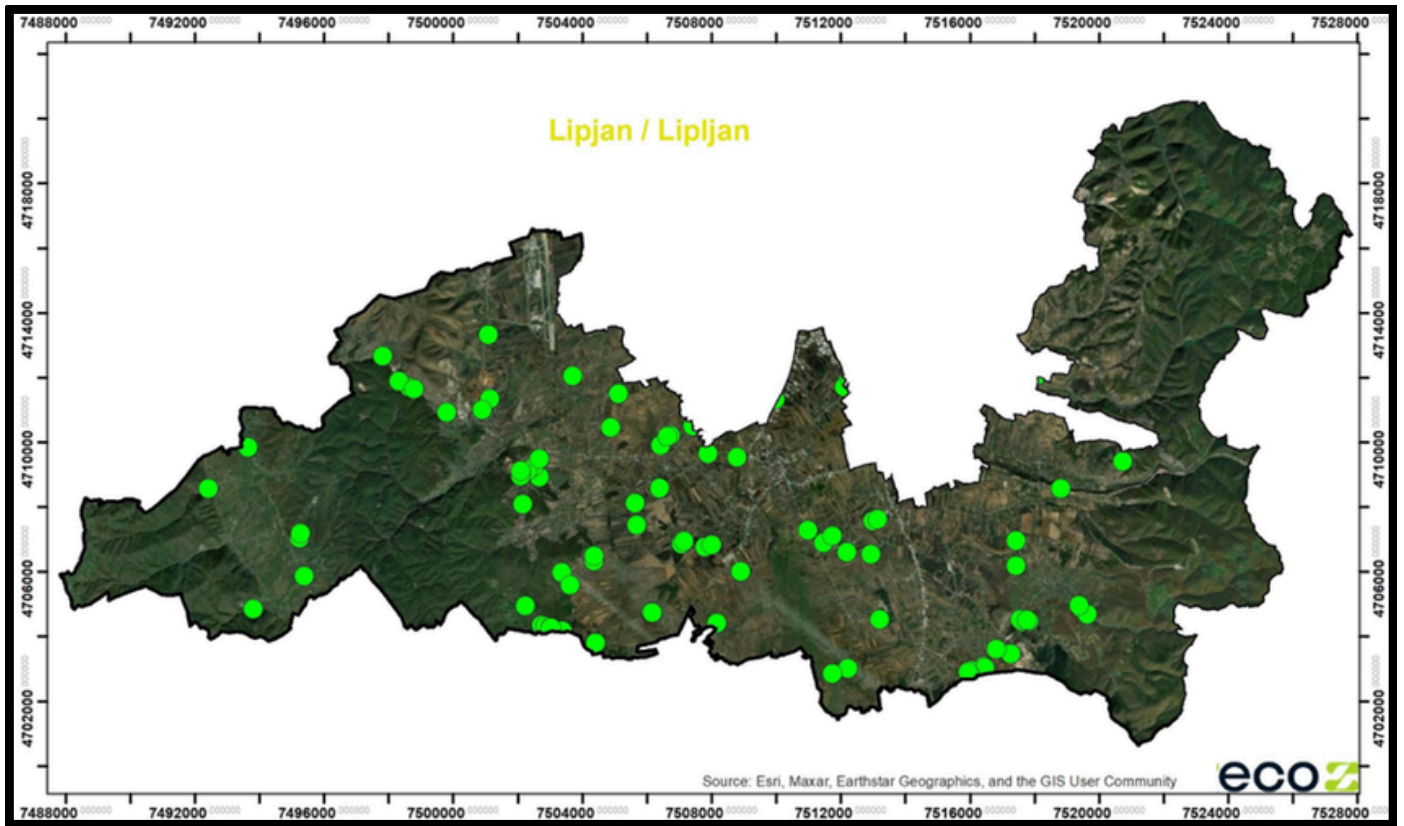
Map 4.5 - Kamenicë/Kamenica



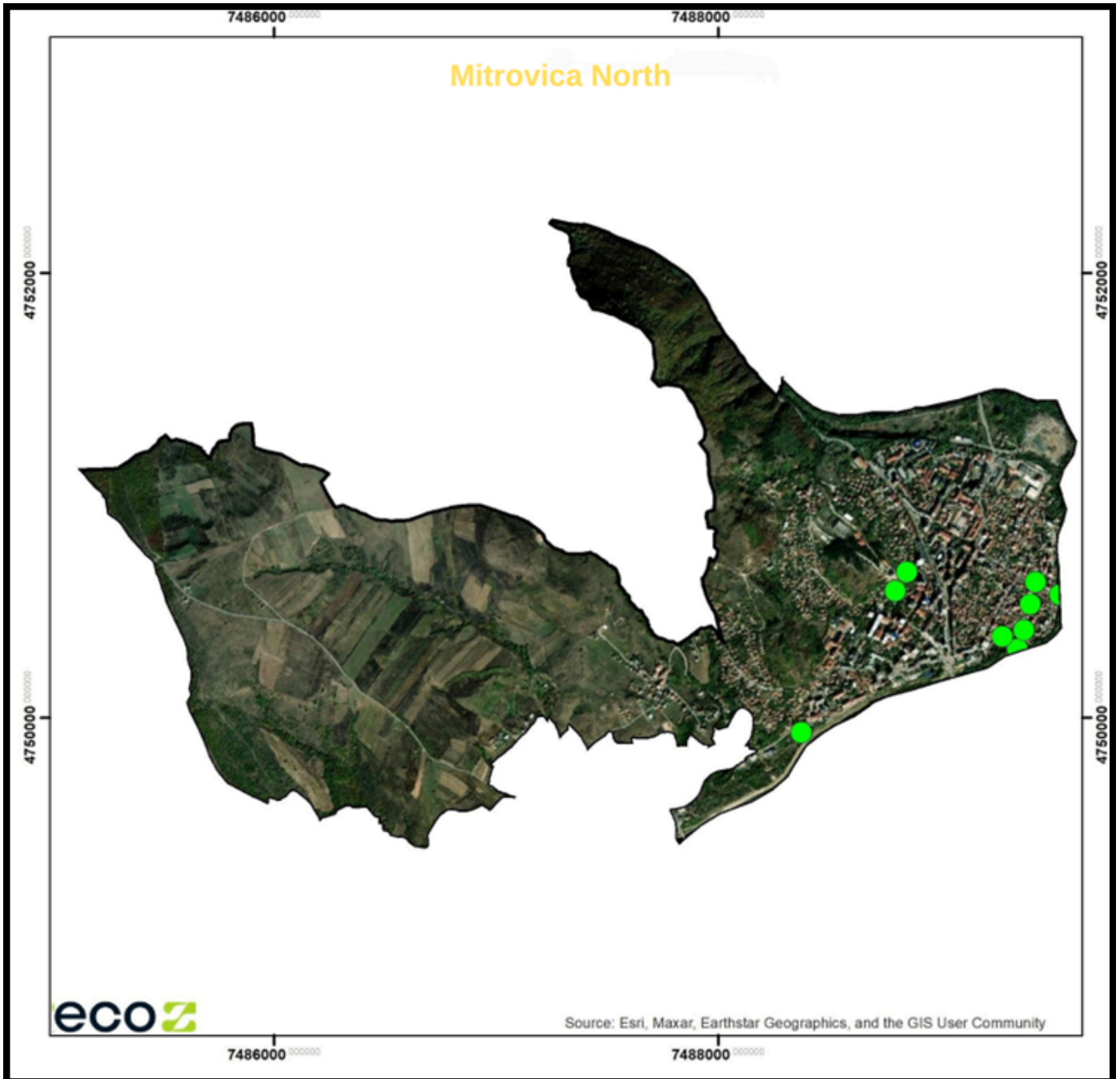
Map 4.6 - Leposavić/Leposaviq



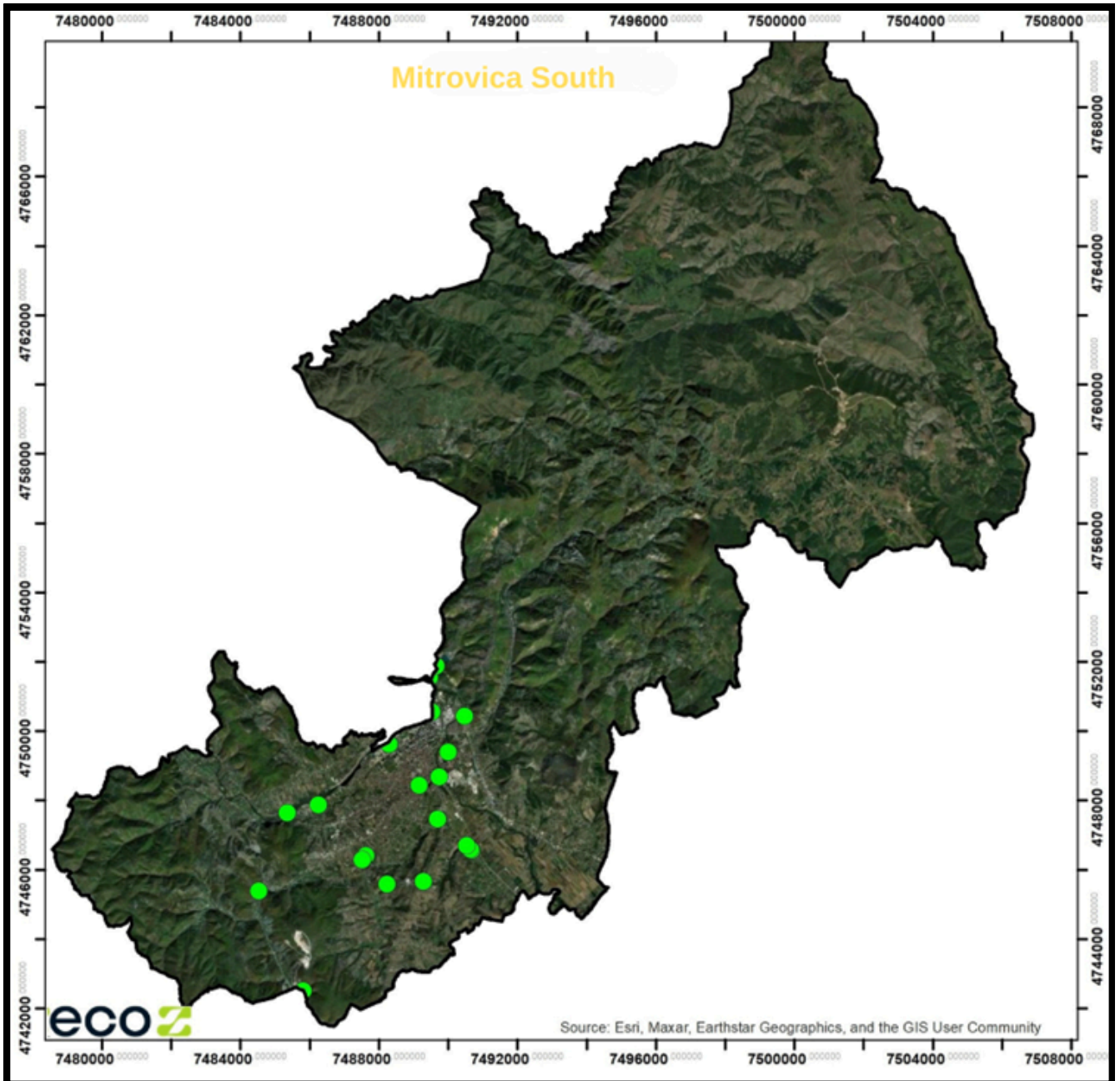
Map 4.7 - Lipjan/Lipljan



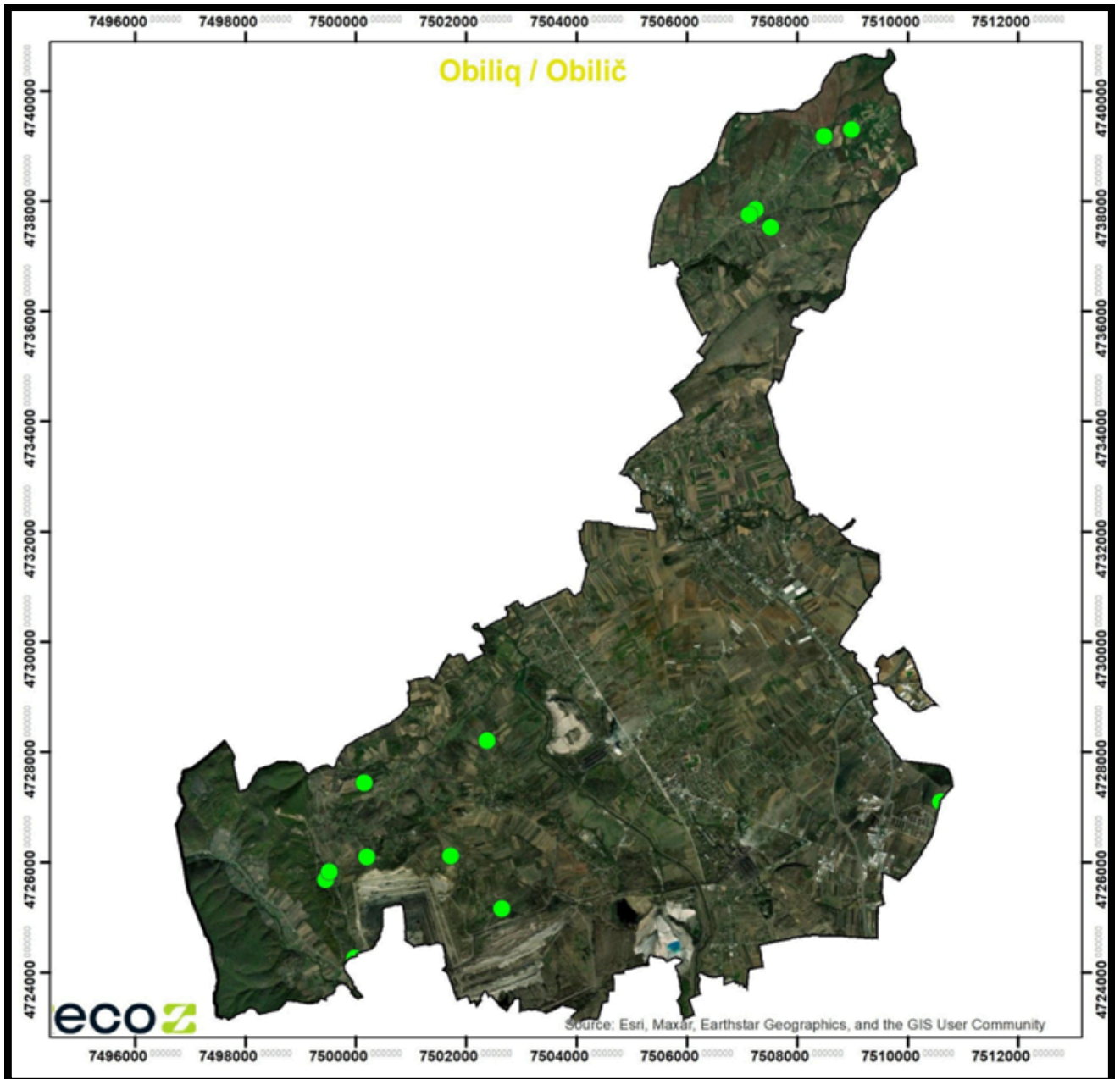
Map 4.8 - Mitrovica North



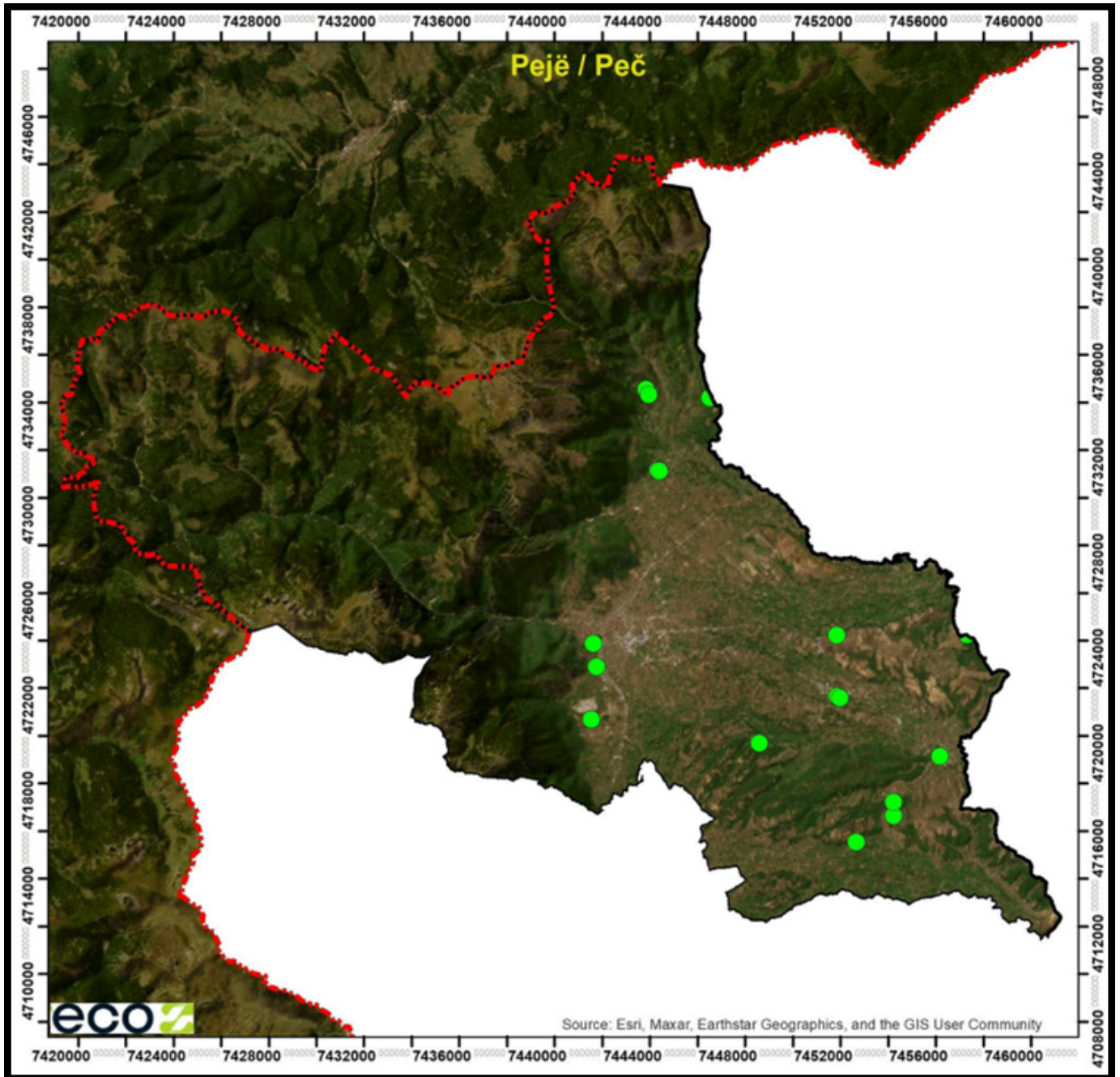
Map 4.9 - Mitrovica South



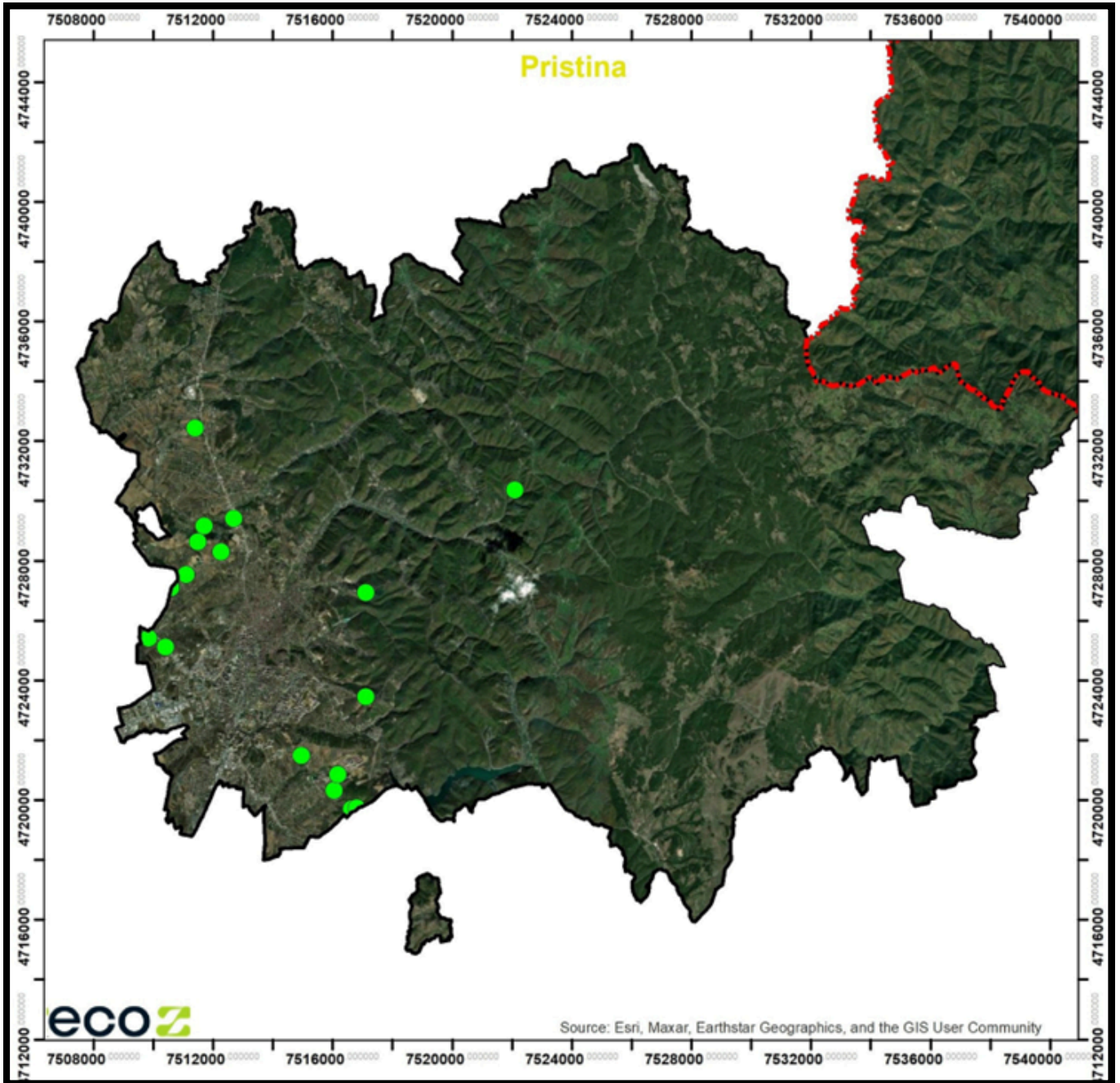
Map 4.10 - Obiliq/Obilić



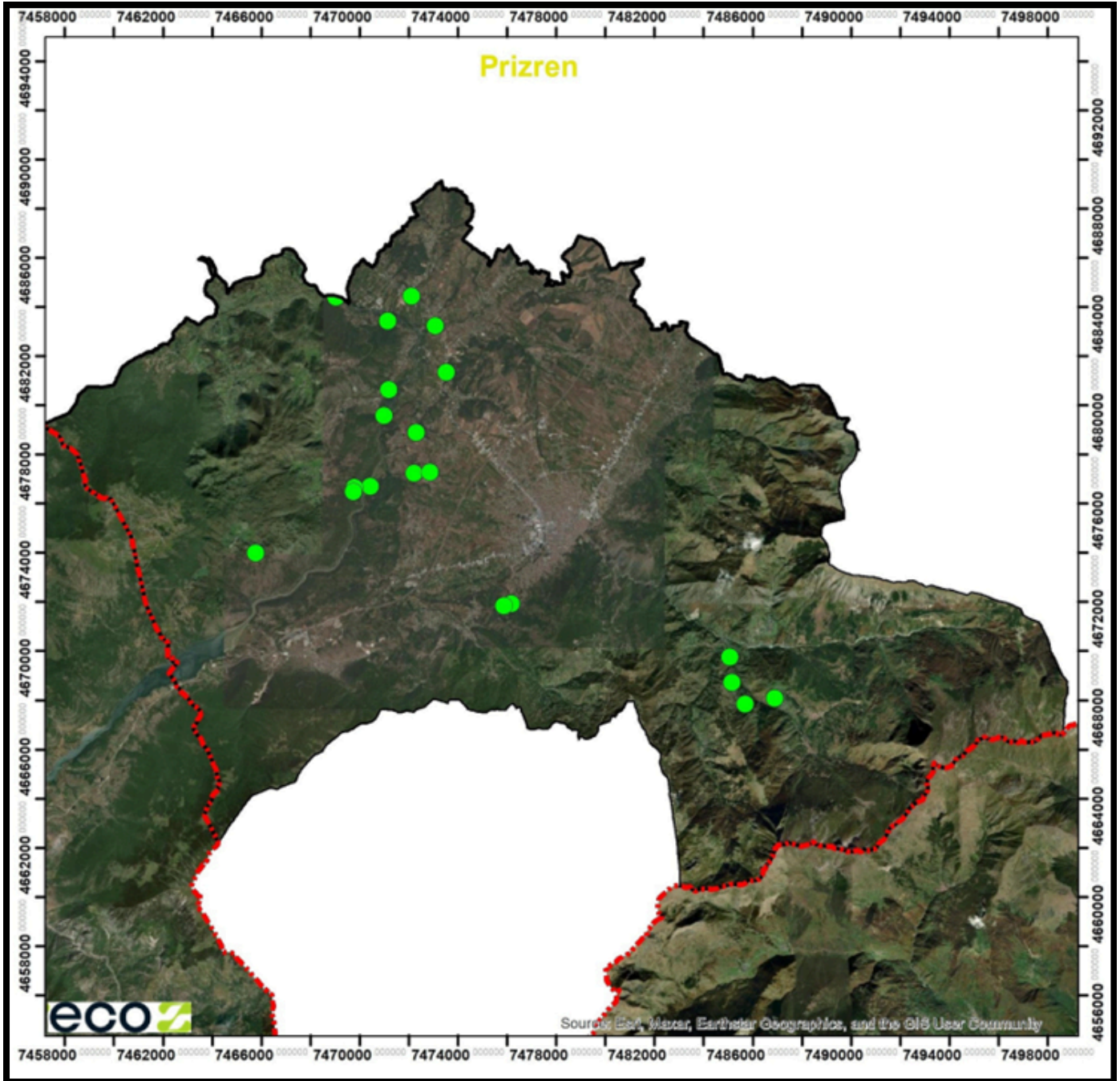
Map 4.11 - Pejë/Peč



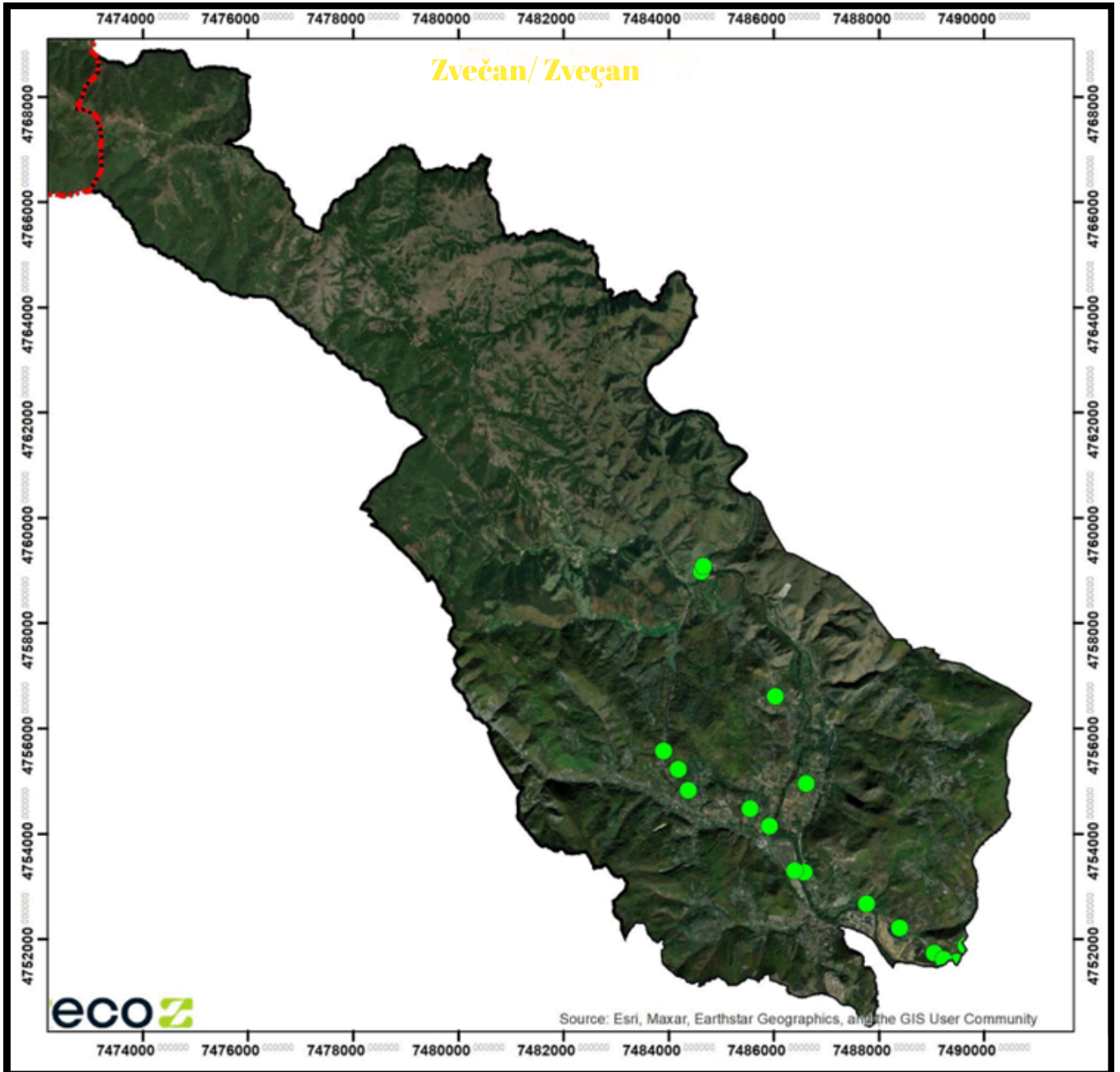
Map 4.12 - Pristina



Map 4.13 - Prizren



Map 4.14 - Zvečan/ Zveçan



4.2 ADDITIONAL OBSERVATIONS

During fieldwork, several additional observations were noted, which are not included in the dataset but may have impact on future planning or illegal waste mapping efforts:

- In several cases, residents in the area were actively hostile to field personnel taking photos of the illegal dumpsites, demanding that photo-taking be halted. Field personnel with experience in the area suggested this may be due to concerns linked to the fact that the illegal dumpsites are used to collect re-marketable items as an alternate source of income.
- Kosovo's major rivers, such as the Morava e Binçës/Binačka Morava and the Ibër/Ibar, have a large amount of waste distributed along much of their length. This is due to several illegal waste dumpsites existing at certain points in the floodplains, which are then subject to seasonal floods that scatter the waste along much longer portions of the river. Field personnel made an effort to differentiate between the actual dumpsites and the waste that had been scattered by rising waters, but this was a difficult task that generally came down to visual estimation.
- The definition of a "large" dumpsite, with a volume of waste of more than 20 garbage bags of 200 L size (or, more than 20 standard wheelbarrow loads), was based on the prior reports. As noted in the results section, by this definition a majority of the dumpsites were classified as large. However, field personnel noted that a wide range of sizes existed within this categorization, with some dumpsites classified as large containing far more waste than others. Future mapping efforts may benefit from an additional size classification of "very large".
- Field personnel noted that several dumpsites showed signs of having been recently burned, and in several cases, were actively burning when field staff arrived. This seems to be a common method of removing waste from dumpsites, which comes with its own significant environmental issues.
- In Gjakovë/Đakovica, many of the removed dumpsites were located in the city center, and they were likely removed as part of the works for building the river walks near the old town.
- In several cases, a dumpsite had been removed since 2023, but a new dumpsite was found very close to the removed location, sometimes within 100 meters or less.
- A significant number of illegal dumpsites were located next to mosques and cemeteries.

- Illegal waste dumpsites may have a stronger impact on vulnerable communities, including low-income households, children, and elderly persons. In some areas, residents may rely on sorting through waste as an informal source of income, exposing them to hazardous materials, smoke from burned waste, and contaminated soil or water. Women may be also particularly affected due to their traditional roles in household care, children's health and community well-being, especially when dumpsites are located near homes, schools, rivers, cemeteries or religious sites. These observations show that illegal dumping should also be addressed as a public health, gender and social vulnerability concern.

5. CONCLUSIONS AND RECOMMENDATIONS

5.1 CONCLUSIONS

Despite the existence of a legal and institutional framework regulating waste management, the findings of this report indicate that illegal dumpsites remain a persistent environmental and rule of law challenge in Kosovo.

The majority of identified illegal dumpsites were classified as large, while most contained mixed municipal/household waste and construction and demolition waste. This indicates that illegal dumping is linked both to household waste disposal practices and to gaps in the management of construction and demolition waste. The presence of industrial or hazardous waste in some locations, especially in Mitrovica South, Lipjan/Lipljan, and Zvečan/Zveçan, further highlights the need for risk-based prioritisation and stronger institutional response.

The desk study of this report shows that municipalities remain central actors in the identification, removal, prevention, and monitoring of illegal dumpsites. However, the identification of newly created illegal waste dumpsites, sites reappearing close to previously removed dumpsites, and dumpsites located near environmentally sensitive areas, including rivers, major roads, residential zones, parks, cemeteries, cultural heritage sites and religious sites, shows that illegal dumping is not only a waste management issue, it is an environmental crime concern (according to article 338 of the Kosovo Criminal Code^[9]) and points to gaps in prevention, monitoring, enforcement, inspection, application of fines and educational measures, public reporting and institutional accountability.

The findings further confirm the importance of maintaining updated, comparable, and georeferenced data on illegal dumpsites. The use of field surveys, GPS coordinates, photographic evidence, Google Forms, and Google My Maps proved useful for documenting the situation and creating a practical basis for institutional follow-up. This model can be further developed into a sustainable and replicable tool for monitoring illegal dumpsites, supporting fact-based decision-making, and improving cooperation between civil society, municipalities, central institutions, inspection bodies, and law enforcement actors. It also proves that without effective reporting, inspection, fact collection, investigation and sanctions, clean-up actions alone are unlikely to prevent repeated illegal dumping.

Overall, while Kosovo has made progress in developing legislation, strategies, and investment plans for waste management, the field findings show that implementation remains the main challenge.

^[9] Criminal Code, 06/L-074,14 January 2019, Article 338: 'Polluting, degrading or destroying the environment

1. Whoever, in violation of the law, pollutes, degrades or destroys the air, water or soil or excessively uses or exploits natural resources shall be punished by a fine or by imprisonment of up to two (2) years.

2. When the offense provided for in paragraph 1. of this Article is committed by negligence, the perpetrator shall be punished by a fine or by imprisonment of up to one (1) year.

3. When the offense provided for in paragraph 1. of this Article results in the impairment to health of a significant number of people or the complete or partial destruction of flora or fauna or reservoirs of drinking water or any other significant material damage to the environment or an increase in pollution to a critical level the perpetrator shall be punished by a fine and by imprisonment of to five (5) years.

Illegal dumpsites continue to pose risks to the environment, public health, biodiversity, rivers, and community well-being. The presence of waste near water bodies is particularly concerning, as seasonal flooding can spread waste along river corridors, increasing the risk of soil and water pollution and making clean-up and monitoring more difficult.

Illegal dumpsites may affect communities differently. Children, elderly persons, persons with disabilities, low-income families and communities living close to dumpsites may face higher exposure or have fewer opportunities to avoid environmental and health risks. Children may be more vulnerable to polluted air from burned waste, contaminated soil and unsafe play areas, while elderly persons and persons with chronic health conditions may be more affected by degraded environment, such as poor air and water quality, that may be contributed to the illegal waste dumps in the short, medium or long term. For these reasons, illegal dumpsite prevention and clean-up should be planned not only as an environmental measure, but also as a public health and social protection priority.

From a rule of law perspective, violations must be identified, documented, reported, investigated, sanctioned and prevented from recurring. For this reason, illegal waste dumpsites should be addressed through both waste management mechanisms and environmental crime response mechanisms. Strengthened cooperation is essential to ensure more effective implementation and follow-up should be planned not only as an environmental measure, but also as a public health and social protection priority.

From a rule of law perspective, violations must be identified, documented, reported, investigated, sanctioned and prevented from recurring. For this reason, illegal waste dumpsites should be addressed through both waste management mechanisms and environmental crime response mechanisms. Strengthened cooperation is essential to ensure more effective implementation and follow-up.

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4. When the offense provided for in paragraph 2. of this Article results in the impairment to health of a significant number of people or the complete or partial destruction of flora or fauna or reservoirs of drinking water or any other significant material damage to the environment or an increase in pollution to a critical level or critical damage to the environment, the perpetrator shall be punished by a fine and by imprisonment up to two (2) years.
 5. When the offense provided for in paragraph 1. of this Article results in irreparable damage or destruction of the environment or endangerment of protected natural resources, the perpetrator shall be punished by a fine and imprisonment of one (1) to eight (8) years.
 6. When the offense provided for in paragraph 2. of this Article results irreparable damage or destruction of the environment or endangerment of protected natural resources, the perpetrator shall be punished by a fine and by imprisonment of six (6) months to five (5) years.
 7. Whoever commits the offence provided in the paragraph 1. of this Article as a member of a group shall be punished by a fine and by imprisonment of up to four (4) years.

5.2 RECOMMENDATIONS

A. CENTRAL-LEVEL INSTITUTIONS

1. Establish an inter-institutional Task Force on illegal waste dumpsites and environmental crime

Relevant central institutions should establish a dedicated Task Force involving competent ministries, KEPA, inspectorates, municipalities, Kosovo Police, prosecution, waste management companies and civil society. The Task Force should strengthen coordination, data sharing, joint decision-making, follow-up on reported cases and implementation of environmental legislation and waste management strategies.

2. Develop a central-level database and monitoring system for illegal waste dumpsites

A centralized database should be developed to record illegal waste dumpsites, including location, status, waste type, size, risk level, photographs and follow-up actions. This would support fact-based planning, institutional accountability, and coordinated response.

3. Assess public health and social vulnerability impacts

The Ministry of Health, the National Institute of Public Health and relevant environmental institutions should assess the health impacts of illegal dumpsites, especially near large, recurring, burned or hazardous waste sites. Particular attention should be given to possible risks to vulnerable categories such as children, elderly persons, persons with disabilities, persons with chronic health conditions and low-income communities.

4. Strengthen enforcement powers, accountability and follow-up cooperation

Central-level institutions should strengthen the legal and administrative basis for municipalities to impose effective penalties on individuals, companies and operators responsible for illegal dumping, while also increasing accountability for municipalities with repeated weak implementation of waste management obligations. A follow-up initiative could assess institutional bottlenecks and pilot a coordinated enforcement model linking central institutions, municipalities, citizens and civil society, including faster response to reported offences and clearer procedures for fact collection, fines and referrals.

B. MUNICIPALITIES

5. Conduct regular mapping and prioritise high-risk sites

Municipalities should regularly map and, together with KEPA/Ministry of Environment and Spatial Planning, verify illegal dumpsites using standardised methodology, GPS coordinates and photographic evidence. Priority should be given to sites near rivers, homes, schools, roads, protected areas, cultural heritage sites, religious sites, cemeteries and locations containing hazardous or industrial waste.

6. Integrate illegal waste dumpsite measures into municipal planning and budgets

Municipal Waste Management Plans and municipal budgets should include concrete measures for prevention, monitoring, removal, enforcement and awareness raising. Municipalities should define clear responsibilities, timelines and annual targets.

7. Prevent re-emergence after clean-up

Clean-up actions should be followed by prevention and site-management measures to reduce the risk of illegal dumpsites reappearing in the same location. These measures may include warning signs, physical barriers where appropriate, regular inspections, surveillance, community reporting mechanisms and targeted awareness activities. Municipalities should also consider changing the use or appearance of cleaned areas through tree planting, greening measures or other nature-based solutions, where feasible, to discourage repeated dumping and restore the site for community or environmental benefit. Repeated illegal dumping should be addressed through stronger enforcement, including the application of fines by municipal inspectors and other competent authorities.

8. Improve access to proper waste disposal services

Municipalities should ensure accessible and affordable disposal options for bulky waste, construction and demolition waste, hazardous waste and other special waste streams, in cooperation with licensed operators and central institutions.

C. KOSOVO POLICE, PROSECUTION AND COURTS

9. Treat illegal dumping as an environmental crime and rule of law concern

Kosovo Police, prosecution offices and courts should treat serious or repeated illegal dumping, hazardous waste disposal, waste burning and dumping as environmental crime and rule of law issues, not only as municipal service problems.

10. Strengthen fact collection, case referral and sanctioning

Police, inspectors and prosecutors should strengthen procedures for documenting, referring and processing cases of illegal dumping. Field evidence such as photographs, coordinates, site descriptions and risk indicators should be used to support investigation, prosecution and sanctioning where applicable.

11. Promote the Kosovo Police “Lajmëro Policinë” app

Kosovo Police, in cooperation with municipalities and environmental institutions, should further promote the “Lajmëro Policinë” app as a public reporting channel for illegal dumping and environmental crime. Community-oriented policing activities and awareness campaigns should explain how citizens can report cases, provide location details and upload photos or videos.

12. Strengthen inspection and enforcement coordination

Environmental inspectorates at the local and central institutions and relevant authorities should increase field inspections, especially in municipalities with repeated or increasing illegal dumpsites. Inspection results should be shared with municipalities, KEPA, Kosovo Police and prosecutors to ensure coordinated follow-up.

13. Cooperate with the National Guard for the Protection of Nature

Relevant authorities should explore cooperation with the newly established National Guard for the Protection of Nature to support community-based monitoring and reporting of environmental crimes, particularly near rivers, forests, protected areas, cultural heritage sites and local communities.

D. CITIZENS, CIVIL SOCIETY ORGANISATIONS (CSOs) AND COMMUNITIES

14. Report illegal dumping and participate in prevention

CSO actions and awareness raising campaigns (recommendation 15 below) should make the citizens be more aware about taking care of the environment and feel encouraged to report illegal dumping through municipal channels or the Kosovo Police reporting mechanisms and the “Lajmëro Policinë” app. Communities living near recurring dumpsites should be regularly involved in prevention and awareness activities.

15. Awareness raising on environmental, health and legal consequences

Inclusive public awareness campaigns should explain the environmental, health, legal and financial consequences of illegal dumping and waste burning, as well as available waste services and reporting channels.

APPENDIX 1. GLOSSARY OF KEY TERMS

CONSTRUCTION AND DEMOLITION WASTE	Waste generated from construction, renovation, demolition or infrastructure works, including concrete, bricks, soil, asphalt, wood, metals and similar materials.
ENVIRONMENTAL CRIME	An illegal act or omission that causes or risks causing damage to the environment, natural resources, public health, biodiversity or protected areas.
HAZARDOUS WASTE	Waste that may pose a risk to human health or the environment due to its chemical, biological, toxic, flammable, corrosive or other dangerous properties.
ILLEGAL WASTE DUMPSITE	An unauthorised location where municipal, construction, industrial, hazardous or mixed waste is disposed of without legal permission, environmental control or formal management.
SANITARY LANDFILL / LICENSED LANDFILL	A formally approved and managed waste disposal facility operating under legal, environmental and technical standards.
WASTE MANAGEMENT	The collection, transport, treatment, recovery, recycling and final disposal of waste, including monitoring and institutional oversight.

APPENDIX 2. LEGAL AND REGULATORY FRAMEWORK FOR WASTE MANAGEMENT IN KOSOVO

Waste management in Kosovo is regulated by **Law No. 04/L-060 on Waste**,^[10] (2012) respectively by **Law No. 08/L-071 (2022) on Amending and Supplementing the Law no.04/L-060 on Waste**.^[11] (2009). The main objective of this law is to prevent and significantly reduce waste generation, promote the reuse of usable components, and encourage sustainable development through the protection and conservation of natural resources. The law also aims to prevent the negative impacts of waste on the environment and public health by ensuring the final disposal of waste in an environmentally acceptable and sustainable manner.

This law regulates waste management, environmental management plans, the rights and obligations of licensed persons engaged in waste management, and the methods and conditions for waste collection, transport, treatment, processing, storage, and final disposal. It also regulates the import, export, and transit of waste, monitoring the information system, financing, and the roles and responsibilities of the institutions in charge of waste management.

Several administrative instructions have also been adopted based on this law. The administrative instructions that are directly related to waste regulation and management include:

- Administrative Instruction (GRK) No. 04/2025 for Amending and Supplementing Administrative Instruction (GRK) No. 07/2023 for Packaging and Packaging Waste;^[12]
- Administrative Instruction (GRK) No. 03/2021 on Hazardous Waste Management;^[13]
- Administrative Instruction (MEA) No. 01/2020 on Waste Management Containing Asbestos;^[14]
- Administrative Instruction MESP No. 14/2017 on Waste Management Containing Persistent Organic Pollutants;^[15]
- Administrative Instruction MESP No. 20/2014 on Biodegradable Waste Management;^[16]
- Administrative Instruction MESP No. 07/2015 on Management of Construction and Demolition Waste;^[17]

^[10] Law on Waste, 04/L-060, 29 June 2012, Article 1. <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2829&langid=2>

^[11] Law on Amending and Supplementing the Law on Waste, 08/L-071, 1 September 2022, Article 1. <https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=62435>

^[12] Law on Administrative Instruction for Amending and Supplementing the Administrative Instruction for Packaging and Packaging Waste, 04/2025, 11 April 2025. <https://gzk.rks-gov.net/ActDetail.aspx?ActID=102648>

^[13] Administrative Instruction on Hazardous Waste Management, 03/2021, 26 January 2021. <https://gzk.rks-gov.net/ActDetail.aspx?ActID=36625>

^[14] Administrative Instruction on Waste Management Containing Asbestos, 01/2020, 18 August 2020. <https://gzk.rks-gov.net/ActDetail.aspx?ActID=30521>

^[15] Administrative Instruction on Waste Management Containing Persistent Organic Pollutants, 14/2017, 25 October 2017. <https://gzk.rks-gov.net/ActDetail.aspx?ActID=15508>

^[16] Administrative Instruction on Biodegradable Waste Management, 20/2014, 06 November 2014. <https://gzk.rks-gov.net/ActDetail.aspx?ActID=10252>

^[17] Administrative Instruction on Management of Construction and Demolition Waste, 07/2015, 29 July 2015. <https://gzk.rks-gov.net/ActDetail.aspx?ActID=10987>

- Administrative Instruction MESP No. 26/2014 on Waste Management from Batteries and Accumulators; ^[18]
- Administrative Instruction MESP No. 21/2014 for Waste Management from Extractive Industry and Mining; ^[19]
- Administrative Instruction (MESP) No. 22/2013 on the Management of Medical Human and Veterinary Waste; ^[20]
- Administrative Instruction MESP No. 10/2015 for Waste Treatment of Medicinal Products; ^[21]
- Administrative Instruction No. 05/2013 on Management of Used Oils and Oil Waste; ^[22]
- Administrative Instruction No. 23/2012 on Management of Disposed and Waste Tires; ^[23]
- Administrative Instruction No. 13/2013 on the State Waste Catalogue. ^[24]

^[18]Administrative Instruction on Waste Management from Batteries and Accumulators, 26/2014, 27 November 2014. <https://gzk.rks-gov.net/ActDocumentDetail.aspx?ActID=10472>

^[19] Administrative Instruction on Waste Management from Extractive Industry and Mining, 21/2014, 12 November 2014. <https://gzk.rks-gov.net/ActDetail.aspx?ActID=10416>

^[20] Administrative Instruction on the Management of Medical Human and Veterinary Waste, 22/2013, 06 November 2014. <https://gzk.rks-gov.net/ActDetail.aspx?ActID=9986>

^[21] Administrative Instruction for Waste Treatment of Medicinal Products, 10/2015, 18 September 2015. <https://gzk.rks-gov.net/ActDetail.aspx?ActID=11090>

^[22]Administrative Instruction on Management of Used Oils and Oil Waste, 05/2013, 05 November 2014. <https://gzk.rks-gov.net/ActDetail.aspx?ActID=9844>

^[23]Administrative Instruction on Management of Disposed and Waste Tires, 23/2012, 05 December 2012. <https://gzk.rks-gov.net/ActDetail.aspx?ActID=9786>

^[24]Administrative Instruction on the State Waste Catalogue, 13/2013, 06 November 2014 <https://gzk.rks-gov.net/ActDetail.aspx?ActID=10384>

Administrative Instructions that are directly related to the regulation and management of dumpsites include:

- **Administrative Instruction (GRK) No. 08/2017 on Waste Landfills Management**^[25]: which aims to protect the environment and human health from pollution and harmful impacts caused by waste dumpsites throughout the active phase and after the final closure of the dumpsite. This instruction regulates the rights and obligations of natural and legal persons managing dumpsites, dumpsite permit conditions, waste acceptance procedures, activity control, monitoring during operation, final closure procedures, and post-closure care.

- **Administrative Instruction (GRK) No. 06/2016 on Conditions for Selecting the Location of the Waste Landfill Construction**^[26]: which aims to define the conditions and criteria for selecting locations and constructing dumpsites to prevent and reduce pollution of water, air, and soil. This instruction regulates the criteria for site selection and construction, as well as the rights and obligations of natural and legal persons who select the location and construct the dumpsite.

Other laws that in some way affect waste regulation and management include:

- **Law No. 03/L-040 on Local Self Government**^[27]: Article 17 of which specifies that municipalities have full and exclusive competencies, with regard to local interest, while municipalities respect the standards set by applicable legislation, in the provision and maintenance of public and municipal services, including water supply, sewage and drainage, wastewater treatment, waste management, local roads, and local transport.

- **Law No. 03/L-087 on Publicly Owned Enterprises**^[28]: which establishes the legal framework regarding the ownership of Public Enterprises and their corporate governance in accordance with internationally recognized principles of corporate governance for public enterprises. Among local public enterprises are also the Regional Waste Companies.

- **Law No. 03/L-025 on Environmental Protection**^[29]: which regulates the integrated system for environmental protection, aiming to reduce the risk of environmental pollution and protect human life and health in line with the concept of sustainable development.

- **Law No. 04/L-174 on Spatial Planning**^[30]: which defines the basic principles of spatial planning, the conditions and methods for spatial development and regulation, the types, procedures, and content of planning documents, the responsibilities of central and local administrative bodies for drafting and implementing spatial planning documents, administrative supervision of the implementation of this law, as well as activities related to spatial planning and territorial regulation in Kosovo.

^[25]Administrative Instruction on Waste Landfills Management, 08/2017, 29 August 2017, Article 1, and 2. <https://gzk.rks-gov.net/ActDetail.aspx?ActID=15149>

^[26] Administrative Instruction on Conditions for Selecting the Location of the Waste Landfill Construction, 06/2016, 12 April 2016, Article 1 and 2. <https://gzk.rks-gov.net/ActDetail.aspx?ActID=7674>

^[27] Law on Local Self Government, 03/L-040, 04 June 2008, Article 17. <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2530&langid=2>

^[28] Law on Publicly Owned Enterprises, 03/L-087, 15 June 2008, Article 1. <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2547&langid=2>

^[29] Law on Environmental Protection, 03/L-025, 06 April 2009, Article 2. <https://gzk.rks-gov.net/ActDetail.aspx?ActID=2631&langid=2>

^[30] Law on Spatial Planning, 04/L-174, 23 August 2013, Article 2. <https://gzk.rks-gov.net/ActDetail.aspx?ActID=8865&langid=2>

According to Law No. 04/L-060 on Waste, waste planning and management are also regulated through strategic documents such as:

- Kosovo Waste Management Strategy;
- Kosovo Waste Management Plan;
- Municipal Waste Management Plans;
- Municipal Waste Management Regulations;
- Waste Management plans by Waste Holders;
- Waste Management Plans by Licensed Persons.

Kosovo Integrated Waste Management Strategy (2024-2035) and Action Plan (2024-2026)^[31]: define strategic objectives, specific objectives, and indicators for the waste management and recycling sector. This strategy covers a 12-year period from 2024 to 2035 and includes a three-year Action Plan from 2024 to 2026. The vision of this strategy is to protect public health and reduce the environmental impact of waste, while at the same time promoting opportunities for business and employment and supporting the transition toward a circular economy aligned with European norms and standards.

The strategy aims to address the current shortfalls and limitations in the waste management sector by defining and implementing four strategic objectives, through which Kosovo will accelerate its progress toward developing economic potential and improving living standards.

Strategic objective 1: *Introduce integrated waste management services and infrastructure.* The strategic objective will be realised with the help of the following three specific objectives:

- **Specific objective 1.1:** Provide appropriate and reliable solid waste collection services to all waste generators.
- **Specific objective 1.2:** Develop integrated and adequate waste recovery and disposal installations for municipal waste.
- **Specific objective 1.3:** Develop appropriate services and infrastructure for waste from industrial activities, construction and demolition waste, hazardous waste and other specific streams.

^[31] Kosovo Integrated Waste Management Strategy (2024-2035) and Action Plan (2024-2026), 08/241, 29 January 2025, Page 7, 8, and 9. <https://gzk.rks-gov.net/ActDetail.aspx?ActID=100754>

Strategic objective 2: *Improve the regulatory, planning and institutional framework conditions for Waste and Resource Management.* The strategic objective will be realised with the help of the following three specific objectives:

- **Specific objective 2.1:** Adopt updated legal framework and establish implementation and enforcement mechanisms.;
- **Specific objective 2.2:** Allocate adequate human and technical resources to the competent institutions and strengthen continuously their capacities.;
- **Specific objective 2.3:** Establish an intermunicipal planning framework and clear procedures to incentivize intermunicipal cooperation.

Strategic objective 3: *Improve the implementation, enforcement and financing capacities in the waste management sector.* The strategic objective will be realised with the help of the following three specific objectives:

- **Specific objective 3.1:** Establish comprehensive and well-functioning permitting, reporting and enforcement systems.;
- **Specific objective 3.2:** Promote mechanisms for full cost recovery and increase investments in the sector.;
- **Specific objective 3.3:** Develop conditions to attract private sector involvement in infrastructure investment and service provision.

Strategic objective 4: *Initiate Kosovo's transition towards circular economy by maximizing utilization of resources from the WM sector.* The strategic objective will be realised with the help of the following four specific objectives:

- **Specific objective 4.1:** Support waste prevention and improved resource efficiency.;
- **Specific objective 4.2:** Increase separate collection, reuse and recycling by performance targets, economic instruments and extended producer responsibility schemes.;
- **Specific objective 4.3:** Raise awareness of the importance and benefits of proper waste management and recycling and stimulate behavior change.
- **Specific objective 4.4:** Increase involvement of economic actors and educational and research institutions in the dissemination and application of circular practices and innovations.

This report is direct support to the Kosovo government waste management action plan, and the actions scheduled for 2026^[32] for the implementation of the Integrated Waste Management Strategy (2024–2035).

- Drafting of feasibility studies and project documentation for the inter-municipal infrastructure of the transfer station, waste sorting, processing and disposal centers developed in accordance with the provisions of the inter-municipal WM plans (Q4 2026).
- Update of monitoring, information, reporting and control systems for CDW (Q4 2026).
- Development of compliance and/or closure plans by all operators of industrial waste recovery or disposal installations and applying for the relevant authorizations or permits (Q4 2026).
- Development and implementation of inventory of closed industrial waste disposal sites (Q4 2026).
- Develop systematic and coherent hazardous waste inventory (Q2 2026).
- Implementation of household Hazardous Waste collection schemes (Q2 2026).
- Drafting of bilateral contracts for enabling the export of hazardous waste from Kosovo (Q4 2026).
- Development and approval of municipal regulations for municipal waste management in accordance with updated legislation (Q4 2026).

^[32]Kosovo Integrated Waste Management Strategy (2024-2035) and Action Plan (2024-2026), 08/241, 29 January 2025, Page 59 - 65. <https://gzk.rks-gov.net/ActDetail.aspx?ActID=100754>

- Drafting and implementation of Capacity Development programme encompassing all technical, managerial, and regulatory aspects of waste and resources sector development, considering sectorial, organizational and individual capacities (Q4 2026).
- Development of waste management information system including EPRP activities, and to improve data quality with strict IT security standards (Q4 2026).
- Development and adoption of the Kosovo Waste Prevention Program, including single-use plastics (Q4 2026).
- Promotion and organization of home composting at local level (Q4 2026).
- Establishing mechanisms and incentives to support the development of repair and reuse networks for discarded products and/or their components (Q4 2026).
- Implementation of household Hazardous Waste collection schemes (Q2 2026).
- Planning and implementation of awareness campaigns, to create interest and a positive shift in behavior to support the reduction of litter, the reduction in waste sent of disposal, separation at source and recycling (Q4 2026).
- Develop environmental-related curricula at each key educational stage in schools (Q4 2026).

Municipal Waste Management Plan (MWMP): is a strategic planning document that enables municipalities to fulfill their legal obligations in the field of waste management, as well as to harmonize and implement central-level policies in this sector. The purpose of this plan is to provide a strategic framework for sustainable waste management within the territory administered by the municipality, in compliance with legal provisions and the strategic planning framework. The MWMP includes: defining sector priorities in order to align with the objectives of the Integrated Waste Management Strategy and its Action Plan; setting activities and undertaking concrete actions to achieve these objectives; regulating organizational and operational aspects in cooperation with other stakeholders involved in municipal waste management; defining institutional roles and responsibilities and the functional regulation of the waste management system; strengthening professional capacities for monitoring and evaluating the situation in this sector; etc.

Municipal Waste Management Regulations: aims to regulate the management of municipal waste, with the objective of establishing a sustainable waste management system. According to these regulations, the responsibilities and duties of municipalities regarding waste management include: establishing a sustainable municipal waste management system; ensuring a sustainable financial system; selecting and designating waste collection points and locations; conducting environmental monitoring of waste dumpsites; identifying illegal dumpsites and ensuring their removal; promoting waste reduction; promoting public awareness and active citizen participation in waste management implementation; preparing waste management reports; drafting municipal waste management plans; etc.

APPENDIX 3. INSTITUTIONS RESPONSIBLE FOR WASTE MANAGEMENT

According to Law No. 04/L-060 on Waste, the competent authorities for waste management are:

- a) Ministry of Environment and Spatial Planning (MESP), and
- b) Municipalities.

The competencies of the **Ministry of Environment and Spatial Planning** for implementing the provisions of Law No. 04/L-060 on Waste include: defining the general policies; drafting the Strategy, laws regulating waste management and regulation of waste sector in Kosovo; drafting Action Plan for waste management according to Article 10 of this law; ensuring the implementation of the Kosovo waste management strategy and plan; issuing licenses for waste management and maintaining the licensing registry; issuing permits for the import, export, and transfer transit of waste; establishing a database and information system for waste management by the Kosovo Environmental Protection Agency in compliance with environmental legislation; preparing reports on waste management in Kosovo; implementing international cooperation agreements in the field of waste management; taking necessary measures to ensure that waste within the territory of Kosovo is managed by licensed persons and in permitted facilities; covering administrative expenses and costs for managing hazardous waste and other waste that are not under municipal responsibility when the owner is unknown; and participating in the drafting of legal provision for waste storage and disposal of narcotic plants and narcotic seized substances, in cooperation with other institutions.

Within the Ministry of Environment and Spatial Planning, there is the Department of Environmental and Water Protection / Division for Waste and Chemicals. The main duties and responsibilities of this Division include: proposing, drafting, and ensuring the implementation of policy and strategy documents in the field of waste management; proposing, drafting, and monitoring the implementation of legislation in accordance with applicable laws and EU legislation; preparing methodologies and instructions related to the administration of waste; proposing, drafting, and ensuring the implementation of procedures and standards for waste management licensing; handling requests for licensing in waste management; providing support, upon request, in environmental supervision and administration of waste, including risk safety aspects; analyzing and preparing regular and periodic reports on activities; and cooperating with relevant stakeholders in the implementation of activities.

Municipalities' responsibilities and obligations for implementing the provisions of Law No. 04/L-060 on Waste include: establishing a waste management system based on the waste hierarchy principle within their territory; drafting local waste management action plans and ensuring conditions for their implementation; harmonizing municipal plan for waste management with the central-level plan; drafting annual reports on waste management; regulating responsibilities for the provision of waste management services; maintaining public information and reporting systems related to waste management; selecting licensed operators for the collection, storage, and transport of different types of waste (inert, municipal, commercial, bulky, and construction and demolition waste) within their territory; setting tariffs and methods for collecting service fees; identifying of contaminated sites within their territory and developing projects for their rehabilitation, including details such as location, spatial characteristics, type of pollution, quantity of waste, deadlines for improvement, and other relevant information. These responsibilities are usually carried out through regional waste collection companies and municipal units. Annual data on waste management, legal compliance, and the situation of illegal dumpsites are collected by municipal officials and reported to the Kosovo Environmental Protection Agency, providing a comprehensive overview of the situation and development of waste management at local and central levels.

The Kosovo Environmental Protection Agency (KEPA), which operates under the Ministry of Environmental Protection and Spatial Planning, is responsible for integrated environmental monitoring and continuous reporting on the state of the environment. KEPA conducts regular field monitoring to assess the overall environmental situation and specifically the state of waste management. It also collects data from various stakeholders, including municipalities, licensed waste management operators, and dumpsite management companies. These data are processed and evaluated to assess the situation in the waste management sector, leading to the publication of annual reports on Municipal Waste Management in Kosovo^[33]. These reports include data obtained from municipalities, licensed regional and local waste collection and transport operators (RWCs), dumpsite management companies, and the Kosovo Agency of Statistics (KAS).

In addition to the Ministry and municipalities, waste management in Kosovo also involves other operational and monitoring actors. These include the Kosovo Landfill Management Company, Regional Waste Companies and the Kosovo Agency of Statistics, which support waste disposal, collection, service delivery, and sector data reporting.

Kosovo Landfill Management Company (KLMC) is a licensed company responsible for managing regional sanitary dumpsites for municipal waste in Kosovo. It provides services at the following regional dumpsites: Mirash Sanitary Landfill – Pristina; Dumnica Sanitary Landfill – Podujevë/Podujevo; Landovica Sanitary Landfill – Prizren; Velekinca Sanitary Landfill – Gjilan/Gnjilane; and the Transfer Station in Ferizaj/Uroševac.

^[33] Report on Municipal Waste Management in Kosovo, 2025.

<https://www.ammk-rks.net/assets/cms/uploads/files/ENG%20Raporti%20per%20gjendjen%20e%20mbeturinave%20ne%20Kosove%202023-2024.pdf>

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Regional Waste Companies (RWCs) are also key actors in waste management. They play an important role in collecting waste in both urban and rural areas within the municipalities they serve, and sometimes also in those that are geographically close to each other. Around 14 regional companies operate in Kosovo and are mainly located in major cities. The waste collected by these operators is transported either to transfer stations for temporary storage or directly to central dumpsites for final disposal. Transfer stations are managed by municipalities, while central dumpsites are managed by KLMC.

The Kosovo Agency of Statistics (KAS) also conducts research and analysis in the fields of agriculture and environment to determine the current situation, performance, challenges, and trends in these areas. Research in the waste sector is mainly carried out through Industrial Waste Survey^[34], Municipal Waste Survey^[35], and Treated Waste Survey^[36]. The methodology used for conducting these surveys is in accordance with Law No. 04/L-060 on Waste, and with EU regulations and recommendations.

^[34]Industrial Waste Survey, 2025. <https://askapi.rks-gov.net/Custom/5914c9e8-7892-49c8-8e6a-897de0a9bb18.pdf>

^[35]Municipal Waste Survey, 2025 <https://askapi.rks-gov.net/Custom/8fb9ca42-d315-46dc-b472-7c3a6e9e39b9.pdf>

^[36]Treated Waste Survey. 2025 <https://askapi.rks-gov.net/Custom/ad1b09fd-70b0-4ec9-bab4-a8d58a047565.pdf>

APPENDIX 4. INVESTMENTS IN THE WASTE MANAGEMENT SECTOR

According to Law No. 04/L-060 on Waste, the financial resources for waste management are provided from:

- Kosovo budget;
- Municipal budgets;
- Donations and grants;
- Payments made by operators, producers, holders, and other persons under the provisions of this law;
- Other financial funds defined by law.

Financial resources from these sources are used for:

- Supporting waste management services based on existing service contracts;
- The implementation and sorting of waste after collection;
- Stimulating recycling processes and establishing a waste exchange market;
- Promoting the development and use of clean technologies for waste treatment;
- Investment and operational costs for the collection, treatment, or reuse of specific and recoverable waste;
- Remediation of contaminated and polluted sites from the past;
- Other expenditures in accordance with this law and other legal acts regulating environmental protection.

In recent years, several important initiatives and investments in Kosovo's waste management sector have been supported, focusing both on improving the institutional and legal framework and on strengthening capacities and infrastructure. According to the 2023 Annual Report on the State of Environment^[37] published by KEPA, some financial resources have been allocated from the Kosovo budget for the construction of municipal dumpsites and support schemes for waste management. These environmental projects also include those financed by the Kosovo budget through the and implemented by municipalities through relevant memoranda.

^[37]Annual Report on the State of Environment. [September 2024, Page 85-87. https://www.ammk-rks.net/assets/cms/uploads/files/Raport%20vjetor%20p%C3%ABr%20gjendjen%20e%20mjedisit%20ANG%20ueb.pdf](https://www.ammk-rks.net/assets/cms/uploads/files/Raport%20vjetor%20p%C3%ABr%20gjendjen%20e%20mjedisit%20ANG%20ueb.pdf)

The project “**Properly functioning financial and institutional management of the Kosovo Landfill Management Company**”^[38] is part of the EU-funded IPA III “EU for Environment” Action Document for Kosovo 2021, and aims to strengthen the Kosovo Landfill Management Company by improving its financial management, institutional structure, operational planning, reporting, and cooperation with municipalities and other stakeholders. The support includes technical assistance to develop a stronger organisational structure, a business plan, better monitoring and reporting systems, standardised operation and maintenance procedures, improved public and stakeholder communication, and a more transparent mechanism for reviewing and approving landfill gate fees. The project has a budget of EUR 2,000,000, is implemented through KfW, and is intended to support more sustainable waste management in Kosovo in line with EU standards and environmental protection requirements.

The project “**Operation inter-municipal integrated waste management system in Dukagjini region**”^[39], financed under EU-funded IPA III “EU for Environment” Action Document for Kosovo 2022, is an initiative with a budget of EUR 9,000,000, implemented through KfW, aiming to improve waste management services in five municipalities in Western Kosovo through a coordinated inter-municipal system. The project focuses particularly on the extension and improvement of the landfill in Pejë /Peć, while also supporting the municipalities of Pejë/Peć, Klinë/Klina, Istog/Istok, Deçan/Deçane and Junik, to strengthen cooperation, improve planning and service coverage, and develop waste management infrastructure and equipment in line with EU standards and circular economy principles.

Under IPA 2022, the project “**Advancing Circular Economy and Integrated Waste Management in Kosovo (ACCENT)**”^[40] has a budget of EUR 9,950,000 and is implemented through GIZ. The project aims to support Kosovo in advancing the circular economy and integrated waste management by strengthening the implementation of the national waste management framework, improving legislation and institutional capacities, and aligning the sector more closely with EU standards. It includes support for waste related legal reforms, capacity building for public institutions and other stakeholders, piloting circular economy concepts, and improving integrated waste management planning in the Pejë/Peć Waste Management Zone (covering Pejë/Peć, Klinë/Klina, Istog/Istok, Deçan/Deçane and Junik), as well as support related to the reconstruction, recultivation and extension of the Pejë/Peć landfill.

^[38]“Properly functioning financial and institutional management of the Kosovo Landfill Management Company”
https://enlargement.ec.europa.eu/document/download/0e664aaf-a8f5-4ae1-a74c-992d1e330953_en

^[39]“Operation inter-municipal integrated waste management system in Dukagjini region”.
https://enlargement.ec.europa.eu/document/download/60448450-b365-4bb1-a5fa-51960dd49a1d_en?filename=C_2022_8940_F1_ANNEX_EN_V2_P1_2345072.PDF

^[40]“Advancing Circular Economy and Integrated Waste Management in Kosovo”. (ACCENT)”
https://enlargement.ec.europa.eu/document/download/60448450-b365-4bb1-a5fa-51960dd49a1d_en?filename=C_2022_8940_F1_ANNEX_EN_V2_P1_2345072.PDF&prefLang=bg

Under IPA 2026–2027, a planned project with a title and implementing partner to be decided at a later stage has an indicative budget of EUR 21,000,000. The project aims to reduce the volume of waste going to landfills in Prizren and Pejë/Peć by improving operational efficiency and strengthening inter-municipal collaboration in waste management. It also aims to establish a functioning and inclusive Hazardous Waste Management System, contributing to safer waste handling, better environmental protection, and more sustainable waste management practices in Kosovo.

An important infrastructure investment is the project **“Provision of Adequate Infrastructure for an Integrated Waste Management System in Pristina, Prizren and Gjilan”**^[41], with a total project cost of EUR 13,000,000 financed by the European Union and implemented by KfW for the period 2022–2028. The overall objective of this project is to contribute to sustainable and safe waste management, promote the implementation of the Kosovo waste management strategy, and align with EU standards. Its specific objective is to improve infrastructure, facilities, and equipment managed and operated by the Kosovo Landfill Management Company in Pristina, Prizren, Gjilan/Gnjilane, Podujevë/Podujevo, and Ferizaj/Uroševac, through investments in dumpsites, transfer stations, and supporting infrastructure in line with EU standards, as well as to reduce greenhouse gas emissions.

Lastly, within the EU4GREEN project, investments in Kosovo have focused on systematic support and capacity development in the field of circular economy and waste management, as one of its pillars. The project has contributed to promoting the transition toward a circular economy through the development of new circular business models (Kosovo’s Pathway to new Circular Business Models^[42]), the organization of regional activities and trainings for public institutions, and the exchange of best practices in areas such as Extended Producer Responsibility (EPR).

The project **“Circular Urban Development – Kosovo4Green”**^[43] (2024–2028), implemented by GIZ in cooperation with the Ministry of Environment, Spatial Planning and Infrastructure, focuses on improving the legal, institutional, and organizational framework for integrated waste management, as well as introducing circular economy approaches. The project also aims to develop municipal investment projects and demonstration initiatives in this field and is supported by a financial commitment for the actual implementation phase of EUR 13,260,000. At a broader regional level, the GIZ project **“Green Transition for Circular Economy”**^[44] (2025–2028), which also includes Kosovo, aims to strengthen the capacities of central and local administrations, private sector, and specialized organizations to create the foundations for reforms toward a circular economy. This project directly addresses the modernization of waste management systems, supports municipalities in implementing circular economy reforms, and promotes new business models for material circulation and private investment in this sector. The project is supported by a financial commitment for the actual implementation phase of EUR 5,300,000.

^[41]“Provision of Adequate Infrastructure for an Integrated Waste Management System in Pristina, Prizren and Gjilan”. <https://kosovoprojects.eu/project/provision-of-adequate-infrastructure-for-an-integrated-waste-management-system-in-pristina-prizren-and-gjilan-2/>

^[42]Kosovo’s Pathway to new Circular Business Models. <https://eu4green.eu/kosovos-pathway-to-new-circular-business-models/>

^[43]“Circular Urban Development – Kosovo4Green”. <https://www.giz.de/en/projects/circular-urban-development-kosovo4green>

^[44]“Green Transition for Circular Economy”<https://www.giz.de/en/projects/green-transition-circular-economy>

APPENDIX 5: QUESTIONNAIRE USED FOR FIELD DATA COLLECTION

Survey: Illegal Waste Dumpsite Locations

1. Your Name

2. Is the landfill new or did it already exist in the 2023/2019 data? If this is the location of a landfill in 2023, has it since been removed or is it still existing?

Mark only one oval.

- New
- Existing
- Removed since 2023
- Inaccessible

3. Please provide the coordinates of the landfill.

4. What is the approximate size of the landfill, in 200 L garbage bag equivalents?

Mark only one oval.

- Small (1 - 5 garbage bags)
- Medium (6 - 20 garbage bags)
- Large (> 20 garbage bags)

5. What type of waste is contained in the landfill? (select all that apply)

Check all that apply.

- Municipal or Household
- Construction or Demolition
- Industrial or Hazardous
- Other: _____

6. Please note any significant nearby environmental or infrastructural features to the landfill.

Check all that apply.

- Near water body
- Near residences
- Near major roadway
- Near businesses
- In a wilderness area
- In a national or municipal park
- Other: _____

7. Any additional comments?

8. Please insert photos of the landfill, capturing the size, type of waste contained, and any nearby hazards.

Files submitted:



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