

Joint NGO proposals on the GAWB Action Plan

Parts 1 and 2 - Action Plan and Roadmaps

Introduction

The [Green Agenda Action Plan](#), endorsed by Western Balkan leaders in October 2021, contains 58 actions grouped under five pillars and seven thematic roadmaps, as well as a description of the Green Agenda's monitoring and governance structure. From the outset, updates of the Plan were envisaged in 2024 and 2027.

It was [clear from the beginning](#) that it contained too many actions, not broken into manageable chunks, and with unclear responsibilities for implementation, but unfortunately civil society groups were consulted much too late to be able to help improve it. At that point, the best option seemed to be to produce more detailed national level GAWB plans and consult them with the public. However, this does not appear to have happened.

Three years have now passed, with very little visible progress. The Action Plan, although it must remain focused on the Sofia Declaration, needs a deep overhaul in order to achieve more. A re-think of the governance structure is also needed. The current situation is untenable: civil society groups do not feel informed about or included in the process and the effectiveness of the bodies leading on regional coordination of the pillars varies widely.

Our proposals are in two documents, which should be read in conjunction with one another: this document covers Parts 1 and 2 of the Action Plan – the Action Plan itself and the accompanying Roadmaps – while the [second one](#) covers Part 3 of the Action Plan, on governance, monitoring, reporting and other mechanisms to support the implementation of the Sofia Declaration. We hope they will contribute to a more concrete and achievable Action Plan and ultimately to more results on the ground.

General comments and proposals

- 1) **Governments' role in developing and implementing the Green Agenda Action Plan needs to be much clearer.** Currently, the Plan is a mixture of actions to be carried out by national governments and those to be done by regional bodies, most of which also require participation from governments in order to be meaningful. Yet as far as we know, the governments were not meaningfully consulted when the Action Plan was developed. Their leaders also only 'endorsed' it, without committing to specific actions.

This not only affects the Green Agenda's governance, but the Action Plan itself, as the responsibilities for implementation are unclear and it cannot be properly monitored or reported on.

The RCC's [Implementation Report](#) published in 2023 has great difficulty identifying whether actions have been completed or not, and if so, whether this happened due to the Green Agenda or would have happened anyway. This will become even more confusing with the Reform and Growth Facility potentially including similar activities, so clear delineation is needed between the Green Agenda and the Facility.

As discussed in our Governance comments, governments must be better included in the Action Plan update, *without being allowed to water down the ambition of the overall Plan*. They also need to make clearer commitments and commit to report annually on them. Either:

- The Action Plan needs to contain an annex for each country, agreed with the relevant government, providing baseline information on the actions it has chosen and its commitments for further implementation, or:
 - The Action Plan update needs to be followed by publicly consulted national-level action plans, following a specific template, within six months.
2. **It is obvious that the region's governments lack capacity, so more prioritisation is needed: Which actions would bring the largest gains for people and the environment in the Western Balkans?** Particularly in the transport section, many of the 'actions' consist of whole plans, some of which are only tenuously connected to the environment. Some of the actions also rely on buzzwords like 'nature-based solutions' and 'alternative fuels' that are still far from proven even in the EU. The Action Plan needs to select individual, impactful actions, rather than combining whole plans with new wish-lists.
3. **The Roadmaps should be integrated into the Action Plan, not presented separately.** It is confusing to have a different number of Roadmaps than Pillars and different indicators. In some cases activities are even mentioned under the Roadmaps that are not in the tables at all. This makes monitoring and reporting needlessly complicated.
4. **Several crucial elements of an action plan are missing and need to be added:**
- larger 'actions' need to be broken down into more manageable sub-actions
 - either in the Plan or in separate national annexes/plans, it needs to be clear what the baseline situation is per country
 - a clearly defined timeframe (not 'indicative timeline' or 'continuous improvement until 2030') is needed for each action and sub-action
 - responsible bodies/institutions for implementation must be added (sub-activities to be done by governments should be clearly distinguished from those to be done by regional bodies) and
 - estimated budget needs should be added for each action.

These would allow progress to be measured transparently and avoid reporting progress where none has been made.¹

5. **Legislation is crucial:** The various pillars suffer from **conceptual inconsistency**, as some include the adoption and implementation of EU environmental legislation, while some – for example *Protection of nature and biodiversity* – do not. We have been told by DG NEAR that transposition of legislation is the day-to-day work of accession and that the Green Agenda should rather go beyond that, acting as a guide on what EU funds can be used for in the environmental field. However, without sound legislation, any positive changes will be sporadic and temporary, while the majority of actors will continue with business as usual. **Our proposals therefore treat environmental legislation as a crucial part of the Green Agenda that must be consistently integrated throughout the Action Plan.**

Specific comments and proposals on *Part 1: Action Plan for the implementation of the Sofia Declaration*

This section contains proposals for specific pillars of the Action Plan where we feel we have specific expertise, namely Decarbonisation in the energy sector and Protection of Nature and Biodiversity. Comments are also included on the Depollution and Circular Economy pillars, but given that we are not deeply involved with all aspects of these fields, we have not put forward specific proposals for changes in the Action Plan. For the transport section of Decarbonisation, we have tried to be as specific as possible, but almost every ‘action’ requires a complete re-think, as they are mostly whole plans in themselves.

In all cases, our proposals cover the main goals from a regional perspective and additional information would be needed regarding national commitments, as outlined above. Information on the estimated budget required should be added as well, but for the regional level this should be done by the institutions leading on each pillar and for the national level by governments.

Decarbonisation

Out of all the Green Agenda pillars, the Decarbonisation one has the clearest implementation structure due to its coordination with the Energy Community and Transport Community. Nevertheless, it contains the greatest number of actions (28) and these include climate mitigation actions that are not necessarily within either of these Treaties. Moreover, there is some overlap between climate mitigation under Decarbonisation and some items under Protection of Nature and Biodiversity. For clarity, it may be advisable to present **energy, transport and climate mitigation in separate groups** under the overall heading of

¹ For example, the current Protection of Nature and Biodiversity Roadmap states that ‘*The first phase (2021-2022) will aim at developing baseline studies and assessments to support actions 51 to 54 and create opportunities for enhanced transposition of EU nature acquis and cooperation between the Western Balkans and the EU in the implementation of the GAWB and the post-2020 global biodiversity framework related to actions 55 and 56.*’ And the Implementation Report 2022 claims that ‘*The first phase (2021-2022) that was aimed at developing baseline studies and assessments can be considered completed*’, due to the fact that each country has a national biodiversity strategy. The short video for Green Agenda implementation (biodiversity pillar), on RCC’s website, goes further: ‘*Since endorsement of the Green Agenda for the Western Balkans, the region made progress. But how much exactly? 6/6 have developed biodiversity strategies and set targets for nature protection...*’ Such claims are highly misleading, at least for North Macedonia, which adopted its strategy (for the period 2018-2023) back in early 2015. It has nothing to do with the Green Agenda. Presenting this as a Green Agenda result brings an element of farce to the whole process and can be considered fraudulent.

Decarbonisation in the updated Action Plan. For now, however, we have kept them together to follow the numbering in the current Action Plan.

Part of the current Action Plan corresponds to the [Decarbonisation Roadmap](#) adopted by the Energy Community Ministerial Council in 2021. Our proposals reflect the progress made so far with implementing the Roadmap and the key actions still needed. However, due to delays in adoption of certain pieces of legislation under the Fit for 55 Package, some of the items mentioned for future adoption in the Decarbonisation Roadmap still cannot be properly planned and require adjustment. Thus our comments below can also be regarded as input for the update of the Roadmap, expected at the end of 2024.

The transport ‘actions’ in the Decarbonisation part of the Action Plan mostly involve implementing entire plans drawn up under the Transport Community Treaty. This makes it particularly difficult to propose specific alternatives but we have tried to do so where possible. Overall, much more clear prioritisation of measures with the greatest environmental difference is needed in the transport section, as it currently includes basically the whole Treaty. A further difficulty occurs due to the fact that the EU is doing much better in decarbonising its electricity sector than its transport sector. This means that the Western Balkans should avoid copy-paste solutions that have not been proven even in the EU (such as non-electricity alternative fuels), and instead concentrate on a limited number of actions with clear benefits.

Given the countries’ existing, legally binding commitments under the Energy Community Treaty, Transport Community Treaty and other international agreements and conventions, our recommendations follow the principle that transposing and implementing such obligations may be considered part of the Green Agenda, but only if they are done within the binding deadlines. This is because the Green Agenda actions may be supported by the Instrument for Pre-Accession, which in our opinion should not be used to patch up non-compliance. For non-binding deadlines which have already passed, such actions may be included in the Green Agenda if they are essential for achieving its goals.

The current Green Agenda Action Plan, although having Decarbonisation as one of its goals, only explicitly mentions a transition away from coal. Prioritising coal is to a large extent justified, as in 2022, 55% of electricity and derived heat in the Western Balkans was generated from lignite,² and it is imperative to rapidly decrease this share, for the sake of the climate, human health and the wider environment. Nevertheless, it is alarming to see several governments in the region planning to rapidly increase construction of fossil gas infrastructure, which runs directly contrary to the goal of decarbonisation by 2050. Such infrastructure usually lasts around four decades and there is no way that another transition will take place by 2050 if new fossil fuel infrastructure is built now. Therefore, the updated Green Agenda Action Plan must be much clearer on steps towards overall decarbonisation, not only coal phase-out.

Among these, considering there is so far no dedicated Just Transition Fund for the Western Balkans, the Green Agenda must include **specific actions to support a just transition of coal and other carbon-intensive regions**. So far this is only mentioned in action no. 15 on participation in the Coal Regions in Transition initiative, which is vague and inadequate.

Our specific proposals are provided in the table below.

² Eurostat, [Production of lignite in the Western Balkans](#), Eurostat, June 2023.

Key		
		Energy and climate mitigation actions
		Climate adaptation actions
		Transport actions

EXISTING ACTION IN THE GREEN AGENDA ACTION PLAN	PROPOSED UPDATED/ NEW ACTION	ROADMAP	TIMELINE	RESPONSIBLE BODIES	INDICATORS
1. Align with the EU Climate Law with a vision of achieving climate neutrality by 2050.	Adopt or update national climate laws to align with the EU Climate Law	Follow usual national legislative processes, with particular attention to public consultation provisions.	End 2025	National ministries, assisted by the Energy Community Secretariat.	Laws adopted Level of alignment with the main elements of the EU Climate Law, including climate neutrality by 2050 at the latest, 2030 targets if not included elsewhere, and legal basis for 2040 targets.
<p>Rationale: Countries must establish clear and measurable goals, measures and activities that ensure carbon neutrality by 2050 at the very latest. This includes clear emissions reductions goals, obligations for all economic sectors and rigorous monitoring and reporting procedures. Existing climate laws set the basis for further action, but their effectiveness and compliance with international standards and obligations require detailed review and improvement.</p>					
N/A	Develop and adopt long-term strategies	Follow usual strategic planning processes, with particular attention to public consultation provisions.	End 2025 Update by 1 January 2029	National ministries, assisted by the Energy Community Secretariat.	Strategies adopted/updated Level of alignment with EU Climate Law, the Governance Regulation and the Paris Agreement.
<p>Rationale: The Roadmap includes the following but it is not included in the Action Plan: ‘Recognising the need to map out a pathway towards carbon neutrality by 2050, the Western Balkan economies should develop and adopt their long-term, low-greenhouse gas emissions development strategies (the long-term strategies) in accordance with the provisions of the EU Climate Law, Governance Regulation and other elements of the EU climate policy framework, and adopt them without further delay and not later than by 2025. These long-term strategies should focus on decarbonisation of the carbon intensive sectors (energy and transport) and define economy-wide targets for emission reductions from all transport modes, buildings, agriculture, industry and waste sector.’</p>					
2. Set forward-looking 2030 energy	Set forward-looking 2040 energy and	(1) Study commissioned by the	1Q 2025	Energy Community Secretariat	Study completed and

and climate targets.	climate targets.	<p>Energy Community Secretariat</p> <p>(2) Period for comments by countries and the public</p> <p>(3) Study completed</p> <p>(4) Proposal to countries by the European Commission</p> <p>(5) Ministerial Council adoption of targets</p> <p>(6) Transposition into national law</p>	<p>1Q 2026</p> <p>April 2026</p> <p>May 2026</p> <p>End 2026</p> <p>End 2027</p>	<p>Energy Community Secretariat</p> <p>Consultants</p> <p>DG ENER</p> <p>Ministerial Council</p> <p>National ministries/governments</p>	<p>publicly consulted</p> <p>Proposal made to countries</p> <p>Adoption of targets in line with carbon neutrality trajectory</p> <p>Transposition</p>
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Rationale: 2030 targets were delayed and implementation now has to be squeezed into a very short timeframe. It is essential to avoid the same situation for 2040 and set a clear policy trajectory.

3. Develop and implement integrated Energy and Climate Plans.	Implement National Energy and Climate Plans and long-term strategies (LTS) and where necessary, update them to integrate clear plans for fossil fuel phase-out and just transition.	<p>(1) Establish country-level Decarbonisation Committees (DcCs) with a mandate to monitor the implementation and effectiveness of measures and actions defined by national NECPs and LTS,³ and propose improvements.</p> <p>(2) Implement measures from existing NECPs and LTS</p> <p>(3) Establish a tracking and reporting system</p> <p>(4) Where not yet done in the NECP or LTS, develop proposals for:</p> <ul style="list-style-type: none"> - coal phase-out dates and action plans 	<p>End 2025</p> <p>Timeline from NECP and LTS</p> <p>Coal phase-out, just transition and lock-in prevention: Draft: End June 2025</p> <p>NECP/LTS</p>	<p>National competent ministries</p> <p>National competent ministries</p> <p>Decarbonisation committees</p>	<p>Number and structure of operational DcCs established</p> <p>Number of WB governments deciding on:</p> <ul style="list-style-type: none"> a) Paris-compatible coal-phase out dates and action plans b) Improved plans to ensure a just transition of carbon-intensive regions c) Paris-compatible oil and gas phase-out dates and action plans <p>Paris-compatible strategies to prevent further fossil fuel lock-in and/or stranded assets</p>
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³ The DcCs must be established in a transparent, inclusive and non-discriminatory manner and enable participation of all stakeholders and consultations with the public.

		<ul style="list-style-type: none"> - mitigating the socio-economic impacts of transition in carbon-intensive regions - strategies to prevent further fossil fuel lock-in and/or stranded assets - oil and gas phase-out dates and action plans <p>(4) Update NECPs and long-term strategies to include the above.</p>	<p>update: End June 2026</p> <p>Oil & gas phase-out:</p> <p>Draft: End June 2026</p> <p>NECP/LTS update: End June 2027</p>	National competent ministries and parliaments	and integrating them into NECPs and long-term strategies.
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Rationale: The deadline for submitting NECPs has already passed and the remaining ones are expected by the end of 2024. Domestic production of lignite increased by 17 per cent in the Western Balkans between 1990 and 2022. And in 2022, 55 per cent of the electricity and derived heat in the region was generated from lignite.⁴ Yet only North Macedonia has established a realistic coal phase-out date.⁵ Thus it is justified to prioritise coal, but significant efforts to prevent gas lock-in and/or stranded assets and speed up wider decarbonisation are also needed. Establishment of DcCs and Action Programmes for Coal Phase-out (APCP) are envisaged by the current Climate Roadmap but not in the actual Action Plan table. DcCs have not been established so far but could be useful, while the APCP should be an integral part of the NECP and long-term strategy, as a stand-alone document would need to have a legal basis established, thus unnecessarily delaying it.

4. Prepare and implement climate adaptation strategies.	Track implementation and ensure regular reporting on the climate adaptation strategies and plans.	<p>(1) Where not done already, adopt the regulatory framework for reporting on the implementation of the climate adaptation strategies and plans.</p> <p>(2) Where not done already, adopt National Action Plans on climate adaptation.</p> <p>(3) Establish a system for monitoring climate change, its impacts, and the implementation and effectiveness of adaptation measures from the strategies and plans.⁶</p> <p>(4) Produce regular, publicly available</p>	<p>June 2025</p> <p>End 2025</p> <p>End 2025</p> <p>Annually</p> <p>By end 2026</p>	National competent authorities	<p>Regulatory framework on reporting adopted</p> <p>Percentage of climate adaptation measures and actions implemented</p> <p>National Action Plans adopted (where not done yet)</p> <p>Monitoring systems set up</p> <p>Annual climate adaptation reports published, presented to the media/public and discussed in parliament</p> <p>Analysis on potential for green infrastructure in climate adaptation Strategies/plans</p>
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⁴ EUROSTAT, [Production of lignite in the Western Balkans](#), EUROSTAT, June 2023.

⁵ Montenegro's publicly announced date of 2035 is too late, as the Pljevlja plant is already more than 40 years old and it is unclear whether it can be brought into line with EU industrial emissions standards. It will also most likely be uneconomic to operate the plant due to CBAM, Montenegro's national emissions trading scheme, or joining a regional or the EU ETS.

⁶ Any bodies set up should include relevant experts and civil society representatives.

		<p>reports on the state of climate risks and adaptation in the country.</p> <p>(5) Undertake analysis of opportunities for projects such as flood protection, water purification, rainwater harvesting, erosion prevention and city cooling using green infrastructure.</p> <p>(6) Update strategies and/or action plans where necessary</p>	By end 2027		updated
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Most of the countries have adopted climate adaptation strategies but there is an ever-present danger of implementation being neglected as it is not given high political priority, and links with biodiversity have not been given enough attention. A clear reporting and monitoring framework can help track resilience to climate change at local and national levels, as well as proposing necessary changes to ensure integration with disaster risk reduction, climate-proofing of investments and green infrastructure.

The current Roadmap also includes an item on ‘By 2026, a Western Balkans Regional Adaptation Strategy (RAS) should be prepared to underline common needs, define joint activities towards increasing regional climate resilience and identify potential financial sources. The Strategy should provide a proposal for fostering climate resilience of the region until 2030 with a long-term vision for a climate-resilient Western Balkan region adapted to the unavoidable impact of climate change by 2050. The Strategy should be compliant with the EU Adaptation Strategy, National Adaptation Plans and other relevant documents and should explore opportunities for a broader deployment of nature-based solutions in increasing climate resilience.’ It is not clear from the Implementation Report whether this has been started, but we propose to cut it, as regional strategies tend to have little ownership from the countries and lack implementation.

5. Align with the EU Emissions Trading System and/or introduce other carbon pricing instruments.	Align with the EU Emissions Trading System and/or introduce other carbon pricing instruments.	<p>(1) Decide which system will be applied</p> <p>(2) Establish an ETS system in the WB countries by 2026</p> <p>(3) Establish effective GHG emission permitting systems in all WB 6 countries</p> <p>(4) Adopt national GHG emission ceilings for ETS sectors</p>	<p>Early 2025 latest</p> <p>Legislation by end 2025</p> <p>Start of carbon pricing end 2026 latest</p> <p>Prices reach those of EU ETS by 1 January 2030</p>	National competent authorities in consultation with the Energy Community Secretariat	<p>Adoption of ETS legislation</p> <p>Schemes starting to function</p> <p>Number of GHG permits issued (country per year)</p> <p>National GHG emission limits established through appropriate legal documents.</p>
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Rationale: Carbon pricing is both an increasingly important instrument for decarbonisation and a condition for avoiding CBAM charges from 1 January 2026.

EU Member States currently spend on average around 75 per cent of their ETS revenues on climate and energy purposes, which under the

revised ETS Directive is increasing to 100 per cent. This offers vast opportunities to scale up support to industry.⁷

Ideally carbon pricing schemes should be in place before CBAM fees are introduced, but as no decision has been taken by governments on a regional level, it seems the timelines will be shifted somewhat.⁸ Nevertheless, countries need to make a commitment before the first CBAM exemption report that is due by 1 July 2025. We estimate that carbon pricing should start to kick in during 2026, ramping up to prices equivalent to the ETS, at least in the electricity sector, by 1 January 2030. This is a tight timeline, but if carbon pricing starts later it will be impossible to increase it enough to qualify for CBAM exemption.

Establishment of an effective GHG monitoring, reporting and verification (MRV) system was in all WB6 countries by the end of 2023 according to the Energy Community Treaty, so has not been included here, even though it is an essential precondition for the points above.

6. Increase opportunities for the deployment of nature-based solutions to mitigate and adapt to climate change.

N/A - We advise deleting this action

Rationale: Although **nature restoration** and **green infrastructure** is increasingly needed, we advise deleting this action. This is partly because it overlaps with climate adaptation strategies under action 4, where we have included a point on this specifically, as green infrastructure should be part of climate adaptation. This action is also too vague and unmeasurable, and the term ‘nature-based solutions’ has frequently been abused to greenwash ineffective and harmful actions such as establishing monoculture plantations in the name of ‘carbon offsetting’. There is a major risk of ineffective ‘nature-based solutions’ serving to divert public attention from the drastic reduction in fossil fuel emissions necessary to keep global temperature rises below 1.5 degrees Celsius by the end of the century – if indeed it is still possible. Such poorly-defined ‘nature-based solutions’ also risk triggering a wave of land-grabbing in the Western Balkans, as has happened in the Global South countries, as companies and governments rush to plant trees and declare themselves owners of plots, land and ecosystems in order to profit from counterproductive offsetting schemes. Therefore, only well-defined green infrastructure should be considered.

7. Ensure participation of WB economies in the European Climate Pact or consider the development of a similar mechanism.

N/A - We advise deleting this action

The European Climate Pact⁹ is an interesting initiative, but the Green Agenda Action Plan should not contain such vague points whose implementation and success cannot be measured.

8. Review and revise, where necessary, all relevant legislation to support progressive decarbonisation of the energy sector.

N/A - We advise deleting this action

⁷ European Commission, [The Clean Transition Dialogues - stocktaking](#), European Commission, 10, 10 April 2024.

⁸ The comments here apply less to Montenegro, which already has an emissions trading scheme, albeit ineffective and under revision.

⁹ European Commission, [European Climate Pact](#), European Commission, 9 December 2020.

Rationale: This is too broad. Specific pieces of legislation are named under other actions.					
9. Prepare an assessment of the socio-economic impact of decarbonisation at the individual economy and regional level.	Establish an ongoing assessment procedure of the socio-economic impact of decarbonisation at the individual economy	(1) Decide on authority responsible (2) Propose assessment and reporting procedure (3) Adopt procedure (4) Report at least annually See also Action 3. Regarding Decarbonisation Committees' role.	End 2025 Mid-2026 End 2026 Annually	National competent authorities for social affairs/economy	Decisions on the authorities responsible Assessment and reporting procedures adopted Annual reports and recommendations published Implementation reviews published
Rationale: Some efforts have been made with the support of international donors at the level of individual countries, but no regional assessment has been done yet. We are not sure of the impact of such an assessment and think efforts would be better concentrated at setting up monitoring structures at the national level. Decarbonisation requires continuous monitoring of socio-economic impacts to ensure its effectiveness and public support, but this is not currently happening.					
10. Prioritise energy efficiency and improve it in all sectors	N/A - we advise deleting this action.				
Rationale: The 'action' is too broad to monitor. We suggest concentrating on the other, more concrete, measures on energy efficiency and energy poverty.					
11. Transposition and full enforcement of the Energy Performance of Buildings Directive.	Transpose and implement Directive (EU) 2024/1275 on the energy performance of buildings (EPBD)	(1) Proposal to the Energy Community (2) Adoption by the Ministerial Council (3) Transposition (4) Submission of Building Renovation Plans	Early 2025 End 2025 End 2026 Mid-2028	DG ENER Ministerial Council National authorities National authorities	Adoption by Ministerial Council Transposition by countries Building Renovation Plans submitted
Rationale: The Western Balkans building sector, comprising all public and private buildings, is the largest final energy consumer with approximately 43 per cent of total energy consumption. ¹⁰ Action on energy efficiency has been slow to get off the ground and the existing Directive has not yet been fully implemented. However, in line with the countries' EU accession ambitions and to address their high energy intensity, it is crucial to increase ambition, especially for new buildings where changes can be made more easily.					
12. Support private and public buildings renovation schemes	Break into two: Increase public funding for	(1) For those countries that have still not done so, set	Annual increase 2025-2030	National competent authorities	Percentage increase of public funding for building renovation

¹⁰ Energy Community Secretariat, [WB6 Energy Transition Tracker](#), Energy Community Secretariat, 16, 2021.

and secure appropriate financing.	<p>renovation of public and private buildings by at least X¹¹ per cent annually.</p> <p>Increase the number of renovations undertaken by ESCOs by X¹² per cent annually.</p>	<p>up energy efficiency funds that include household renovation with grants according to EPBD standards.</p> <p>(2) Increase funding available for such schemes year on year, including for skills training.</p> <p>(3) Ensure adequate monitoring, inspection and reporting mechanisms are in place to ensure accountability and public support.</p> <p>(4) Analyse and address remaining barriers to ESCO operations</p>			<p>per year</p> <p>Percentage increase in renovations undertaken by ESCOs</p>
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Rationale: The existing action is crucial but too broadly formulated. An absolute sum could also be calculated per country if feasible.

13. Increase the share of renewable energy sources and provide the necessary investment conditions.	<p>Break into several pieces:</p> <p>Ensure all permits can be applied for and issued online</p>	<p>(1) Review justification for permits/consents and abolish unnecessary or duplicating ones.</p> <p>(2) For the remaining ones, set up online application system</p>	<p>Mid-2025</p> <p>Mid-2026</p>	Competent national authorities	<p>Reviews undertaken of permits/consents and supporting documentation needed</p> <p>Online permit application systems functional</p>
	<p>Ensure adequate staffing and skills of permitting authorities</p>	<p>(3) Review bottlenecks in permitting authorities</p> <p>(4) Ensure adequate staffing</p> <p>(5) Ensure adequate training and supervision of permitting authorities</p>	<p>Mid-2025</p> <p>Mid-2026</p> <p>Plan mid-2025</p>	Competent national authorities	<p>Bottlenecks review undertaken</p> <p>New or replacement staff appointed</p> <p>Training undertaken</p> <p>Supervision systems reviewed</p>

¹¹ Amount to be proposed by e.g. the Energy Community Secretariat or other experts in this field.

¹² Amount to be proposed by e.g. the Energy Community Secretariat or other experts in this field.

	Increase community energy and rooftop solar	(6) Adopt any remaining implementing legislation to encourage energy communities and rooftop solar (7) Include community energy provisions in solar and wind auctions	Mid-2025 End 2026		Any remaining implementing legislation adopted Auctions held with specific support for community energy Installation figures in MW
Rationale: The existing action is crucial but too broadly formulated. Many other actions need to be taken as well as the ones above, but many of them are obligatory and time-bound under existing legislation, whereas the ones above are either not stipulated at all or lack deadlines.					
14. Decrease and gradually phase out coal subsidies, strictly respecting state aid rules	N/A - we advise deleting this action.				
Rationale: Coal subsidies certainly need to be phased out, however this is a matter of compliance with State aid legislation that should happen anyway, not something that should be potentially supported via EU IPA funds under the Green Agenda.					
15. Ensure participation in the Coal Regions in Transition initiative for the Western Balkans.	Draw up equivalents to Territorial Just Transition Plans for carbon-intensive regions	1) Collect stakeholder and public input 2) Determine terms of reference in consultation with all relevant stakeholders 3) Apply for technical assistance if needed 4) Hire consultants or facilitators if needed ¹³ 5) Draft plan and if applicable, Strategic Environmental Assessment (SEA) 6) Hold public consultation 7) Amend plan based on consultation 8) Adopt or endorse	Stakeholder and public input by 1Q 2025 ToR and proposal for technical assistance by 2Q 2025 Consultants hired by end 2025 Draft plan end 2026 Consultation 1Q 2027 Plan adopted/endorsed by end 2027 Implementation depends on deadlines in plan	Local authorities in coal regions with support from national competent authorities	Initial consultation held ToR developed for at least one plan per country At least one plan drafted per country + SEA where needed Public consultations held and input taken into account Plan adopted or incorporated into other binding documents Implementation proceeds according to plan/deadlines.

¹³ Although we favour building the countries' own capacities, this is a new field and it seems likely they will need external assistance, which is readily available under various instruments, including JASPER, LURA and others.

		plan ¹⁴ 9) Secure finances and human capacity for implementation			
<p>Rationale: At the moment, the initiative does not exist. Its replacement is gradually being set up. However, even when it becomes operational, regions should participate because they find it useful, not because the Green Agenda says so. The Action Plan should list only more tangible actions, whose results can be more clearly measured, not 'participation'.</p>					
16. Develop programmes for addressing energy poverty and financing schemes for household renovation and providing basic standards of living	Increase competences, funding and staffing for local authorities to tackle energy poverty	(1) Tackle any legal gaps needed to establish the role of local authorities in tackling energy poverty and track implementation (2) Increase resources for dedicated staff, training and energy efficiency measures (3) Increase quality and quantity of energy efficiency measures supported by local authorities	Legal gaps closed by end 2025 Resources to be increased annually	National competent authorities Local authorities	Legal gaps closed Resources and staff increase year on year Number and type of energy poverty measures supported by local authorities
<p>Rationale: Action 12 covered the setting up of general support for household renovations but to reach the most vulnerable, action has to be taken at the local authority level. So far, local authorities lack dedicated staff, experience and resources to tackle these issues.</p>					
17. Support the development of smart transport infrastructure, promote fostering of innovative technologies (such as paperless transport, artificial intelligence, multimodal passengers ticketing, mobility as a service, border/ boundary crossing applications, 5G corridors, etc.).	N/A - we advise deleting this action				
<p>Rationale: Some of the actions mentioned are important, others not so much, but overall the action is much too wide and ill-defined. The important components should be included in other actions in contexts where they are better analysed and justified.</p>					
18. Implement the Regional Action Plan	This should be replaced with one or more specific	We do not have a full insight into the steps needed for this but if	Deadlines should be set for the following routes:	National rail operators, transport	At least two passenger trains run daily in each

¹⁴ Each country will need to decide on the plan's status within its legal system and whether it is to be adopted as a plan in its own right or incorporated into other existing documents.

for Rail Reforms.	action(s) with clear, visible result such as ‘Ensure at least two passenger trains run daily in each direction between capital cities in the region’ and/or ‘Increase rail passenger/freight transport by at least X per cent annually’ .	they are similar across all countries, they should be included as regional steps in the Action Plan, or if not then they should be listed per country as steps towards the actions.	Belgrade-Skopje Skopje-Thessaloniki Skopje-Prishtina Belgrade-Zagreb Belgrade-Sarajevo Sarajevo-Zagreb Podgorica-Tirana And potentially Belgrade-Prishtina, depending on political agreements (Belgrade-Podgorica is running) Overall rail passenger/freight transport should increase annually.	ministries	direction, taking less time than equivalent buses. Number of passenger-kilometres and freight tonne-kilometres per year.
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Rationale: The [Rail Action Plan](#) covered the period from 2020 to 2023. Although much remains to be implemented, it does not make sense to use IPA funds for actions that should have been implemented already. Moreover, whole plans should not count as ‘actions’ for the purpose of the GAWB Action Plan.

As regards the alternatives suggested, the region’s transport ministers already committed to re-establish intercity passenger connections as part of the [South East European Parties Dedication to Rail declaration](#) in September 2021, but without any deadlines. This goal, with a deadline of 2023 for existing lines, was also included in the 2021 [Strategy for sustainable and smart mobility in the Western Balkans](#), which is however not binding for the countries. So it would be appropriate to update this commitment and make it more concrete. Regarding overall rail passenger and freight transport, passenger-kilometres and freight tonne-kilometres are cross-cutting success indicators that apply to all countries, no matter their starting point.

19. Define rail freight and inland waterway transport corridors.	N/A - we advise deleting this action
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Rationale: This is done under the TEN-T Regulation, whose [updated version](#) recently entered force in the EU, and we do not see any added value of the Green Agenda for this process.

20. Define an overall strategy to shift traffic from road to more environmentally friendly modes.	This should be split in two: Update the Strategy for sustainable and smart mobility in the Western Balkans Update national transport strategies to reflect 2050 decarbonisation commitments	For the Strategy for sustainable and smart mobility in the Western Balkans: 1) Collect stakeholder/public input on changes needed to the current Strategy 2) Draft update 3) Consult with	Strategy for sustainable and smart mobility in the Western Balkans update by 2026 National transport strategy updates by 2027	Transport Community Secretariat; governments endorse National competent authorities	Updated Strategy for sustainable and smart mobility in the Western Balkans publicly consulted, endorsed by governments and published Monitoring reports show annual progress in
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		<p>governments</p> <p>4) Amend text accordingly</p> <p>5) Hold public consultation</p> <p>6) Incorporate amendments based on consultation</p> <p>7) Table for endorsement</p> <p>8) Governments endorse</p> <p>9) Secure funds and human resources to ensure implementation</p> <p>For national strategies the process is similar, but with transport operators being consulted in step 3, and steps 7 and 8 being replaced by national adoption processes.</p>			<p>implementation</p> <p>National transport strategies updated in line with 2050 decarbonisation goal, publicly consulted and adopted</p> <p>Monitoring reports show annual progress in implementation.</p>
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Rationale: The goal is crucial but the original action was too broad. It needs to be clearer how this modal shift strategy will be done.

21. Identify the EU technical standards and ensure their implementation and digitalisation of all transport modes.	We do not have expertise in this area but this 'action' should be much more specific and aimed only at measures which will have a clear positive environmental impact, either directly or by encouraging modal shift.	See column two	See column two	See column two	See column two
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Rationale: This is too wide, consisting of hundreds of sub-actions, not all of which have direct positive environmental impacts.

22. Implement the Regional Transport Facilitation Action Plan.	N/A - we advise either deleting this or selecting 1-2 actions with clear environmental benefits				
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Rationale: The [Regional Transport Facilitation Action Plan](#) was adopted in 2020 with deadlines up till the end of 2023, so at the very least it needs updating. However, as with other plans, it should not be counted as an 'action' as in reality it consists of a multitude of actions and sub-actions. It also covers a variety of sectors and does not have an explicitly environmental goal. Therefore this point should either be deleted or 1-2 actions selected from the Plan for inclusion, with new deadlines set and sub-actions clearly listed.

23. Implement the Regional Road Safety Action Plan.	N/A - we advise deleting this.				
Rationale: While road safety is obviously important, its link to the Green Agenda is tenuous.					
24. Implement the Road Action Plan	N/A - we advise deleting this.				
Rationale: Again, it is a whole plan, not a single action. Although it attempts to 'green' roads, in our opinion this is not the top priority now: modal shift is, both in long-distance and urban transport. The Road Action Plan also overlaps with several other points in the GAWB Action Plan such as climate resilience in transport, alternative fuels etc., making monitoring and reporting more complicated.					
25. Develop and implement climate resilience plans for Western Balkan economies' transport networks	<p>This should be split into at least two items:</p> <p>1) Prepare and implement climate resilience investments for the most urgent of the top ten vulnerable road and rail sections in each country</p>	<ol style="list-style-type: none"> 1) Select 3-4 priority resilience investments per country 2) Apply for technical assistance to develop project documentation 3) Undertake permitting procedures 4) Apply for financing 5) Implement projects 	<p>Project selection by June 2025</p> <p>Proposals for technical assistance by the end of 2025</p> <p>Permits and financing secured by end 2026</p> <p>Projects completed by 2030</p>	National competent authorities	<p>3-4 projects selected per country</p> <p>Project documentation developed for each project</p> <p>Permits secured for each project</p> <p>Financing secured</p> <p>Projects satisfactorily completed</p>
	<p>2) Develop and implement climate resilience plans for each country's transport sector, including in cities</p>	<ol style="list-style-type: none"> 1) Collect stakeholder and public input 2) Determine terms of reference 3) Apply for technical assistance if needed 4) Hire consultants¹⁵ 5) Draft plan and if applicable, Strategic Environmental Assessment (SEA) 6) Hold public consultation 7) Amend plan based on consultation 8) Adopt or endorse plan¹⁶ 9) Secure finances 	<p>Stakeholder and public input by 1Q 2025</p> <p>ToR and proposal for technical assistance by 2Q 2025</p> <p>Consultants hired by end 2025</p> <p>Draft plan end 2026</p> <p>Consultation 1Q 2027</p> <p>Plan adopted/endorsed by end 2027</p> <p>Implementation depends on</p>	National competent authorities	<p>Initial consultation held</p> <p>ToR developed for at least one plan per country</p> <p>At least one plan drafted per country + SEA where needed</p> <p>Public consultations held and input taken into account</p> <p>Plan adopted or incorporated into other binding documents</p> <p>Implementation proceeds according to plan/deadlines.</p>

¹⁵ Although we favour building the countries' own capacities, this is a new field and it seems likely they will need external assistance.

¹⁶ Each country will need to decide on the plan's status within its legal system and whether it is to be adopted as a plan in its own right or incorporated into other existing documents.

		and human capacity for implementation	deadlines in plan		
<p>Rationale: The first steps have already been taken to identify vulnerable transport infrastructure in the 2023 Transport Community study <i>Improving climate resilience and adaptation measures in the indicative extension of TEN-T road and rail networks in Western Balkans</i>. This should be followed up and developed into concrete projects as soon as possible. In addition, there is a need for more analysis at the national level going beyond only the TEN-T network and covering other important transport infrastructure, especially in cities where hundreds of thousands of people are affected by transport problems.</p>					
26. Promote preparation and implementation of Sustainable Urban Mobility Plans for urban areas in the Western Balkans.	Update and implement Sustainable Urban Mobility Plans for at least cities of more than 100,000 people.	<ol style="list-style-type: none"> 1) Collect stakeholder and public input on changes needed 2) Draft plan and if applicable, Strategic Environmental Assessment (SEA) 3) Hold public consultation 4) Amend plan based on consultation 5) Adopt or endorse plan¹⁷ 6) Secure finances and human capacity for implementation 	Updates at least once every four years. Deadlines may also depend on adoption of new TEN-T Regulation in the region.	City authorities to update plans; Transport ministries to monitor and support	<p>Initial consultations held in each city over 100,000 inhabitants</p> <p>Updated plans drafted</p> <p>Public consultations held and input taken into account</p> <p>Plan adopted or incorporated into other binding documents</p> <p>Implementation proceeds according to plan/deadlines.</p>
<p>Rationale: The Implementation Report states that the region's capitals and some smaller cities have such plans, but they will certainly need to be updated to increase their ambition and adapt to changing circumstances.</p>					
27. Define sustainable mobility solutions at the regional level including plans for deployment of alternative fuels. 27a. Define a plan for deployment and building of charging stations for electric vehicles.	Delete 27 and adjust 27a to ' Plan and build charging stations for electric vehicles '.	We do not have expertise in this area but expect that the steps can be derived from CONNECTA's report on a <i>Strategic framework for the deployment of e-charging stations in the Western Balkans</i> .	To be defined based on the results of CONNECTA's report.	National competent authorities, relevant installation companies	Percentage of needed e-charging stations inst

¹⁷ Each country will need to decide on the plans' status within its legal system and whether they are to be adopted as a plan in their own right or incorporated into other existing documents.

Rationale: Regulation (EU) 2023/1804 of 13 September 2023 on the deployment of alternative fuels infrastructure defines ‘alternative fuels’ as including everything from electricity through hydrogen and ammonia to biofuels and even liquid fossil gas. Several of these – notably hydrogen, biofuels and fossil gas raise serious concerns regarding their environmental impact and economically feasible potential and should not be promoted in the Western Balkans. The EU does not have a successful history of promoting alternative fuels: its poorly thought-out promotion of biofuels had to be rolled back once its environmental and food security impacts became clear, and even its current policy of encouraging secondary biofuels is unable to ensure the origin of such fuels. The European Commission has also been heavily promoting hydrogen in recent years, yet today almost all hydrogen is made using fossil fuels. Even when more renewable hydrogen becomes available, it will be too scarce and too expensive to use as a regular fuel. And fossil gas is not an ‘alternative’ at all.

Electric vehicles are not a panacea and advances are needed to move beyond batteries using critical minerals and minimise the use of low-occupancy car transport. But at least they are economically viable and use a widely available ‘fuel’. Until the EU can prove that its transport decarbonisation policies actually work in reality, it would be extremely unwise for the cash-strapped Western Balkan countries to spend funds on networks of hydrogen filling stations or other ‘alternative fuel’ supply points. And under no circumstances can the Green Agenda support the use of fossil gas for transport or anything else.

28. Increase regional cooperation in the area of alternative fuels infrastructure development.

N/A - we advise deleting this.

Rationale: This is very similar to the action above, but regional.

Circular economy

As mentioned above, we are only following some aspects of the circular economy and cannot provide as detailed proposals as for Decarbonisation or Protection of Nature and Biodiversity. We would also like to acknowledge that we see more activity at the regional level on this pillar than on biodiversity or depollution. Nevertheless, as with the other pillars, the actions in the current Action Plan are too broad and difficult to measure and in too many cases will not result in visible changes benefitting people and the environment. In some cases, it is also unclear exactly what is meant by the action. In particular, we would like to comment on the following actions.

29. Improve sustainability of primary production of raw materials

This is too broad and unmeasurable and it is not clear exactly what is meant. Mining companies should comply with the law in any case, and tightening of some of the relevant legislation, such as by properly transposing the Water Framework Directive, is already included in other parts of the plan, or in the case of the Habitats Directive, we propose it below. Worryingly, the Implementation Report mostly **describes the ‘opportunities’ for opening more mines in the region, not improving the environmental performance of the existing ones. At best, mining is a necessary evil: it is not part of the Green Agenda.** Communities pay with their health and environment in return for a few jobs and low concession fees and taxes, while too often the materials mined are exported for processing, so very little value is added within the Western Balkans. Adding value within the countries could help to address the latter issue, but is more a question of industrial strategy than of the Green Agenda. Therefore, to avoid the Action Plan supporting greenwashing, **we request the deletion of this ‘action’.** **The Circular Economy section should instead concentrate on materials reduction and recycling.**

30. Apply an industrial ecosystem approach to attain environmentally sustainable, balanced economic recovery.

Again, this is too broad and impossible to measure.

31. Develop circular economy strategies looking at the entire lifecycle of products.

We are glad to see there has been some progress in this action. Still, it seems very wide. It is also crucial to be clear what is and isn't a circular economy. For example, we were horrified to see representatives of international financial institutions claiming that waste incineration with energy recovery is a circular economy activity at the 'Revolve to Evolve - Go Circular', event on 8 February in Prishtina. **Burning waste is the very definition of a linear economy** and has no place in the Green Agenda or in anything entitled 'circular economy'. For the update we propose breaking the adoption and implementation of circular economy strategies into smaller steps.

32. Make further progress in the construction and maintenance of waste management infrastructure for cities and regions.

This is extremely important and has the potential to be a concrete, visible change that ordinary people can feel. But it has to be more concrete, with **clear targets for waste prevention, re-use, recycling and composting** (not diversion from landfill, which tends to encourage local authorities to spend large amounts of money on incinerators). According to the EU's [Waste Framework Directive](#), the preparation for re-use and the recycling of municipal waste must be increased to a minimum of 55 per cent, 60 per cent and 65 per cent by weight by 2025, 2030 and 2035 respectively. These are challenging but crucial targets and the Western Balkans are falling further and further behind. Concerted action with clear targets and dissuasive penalties for non-compliance are needed in the national legislation, and any waste management facilities funded by the EU must respect the waste hierarchy and facilitate the achievement of these targets.

35. Further implement Smart Specialisation Strategies, place-based, innovation-led transformation agendas for sustainability.

Not being familiar with all the elements of this description, we turned to the Implementation Report to understand what this means in practice. We are still none the wiser, but would like to suggest a more concrete, less jargon-based action in the updated Action Plan.

Depollution

The actions in this section are in our opinion going in the right direction but need to be broken down into more specific steps with clear deadlines.

36. Finalise the process of ratification of Convention on Long-range Transboundary Air Pollution and its protocols.

36a. Support modelling to establish economy-wide emission reduction commitments for the five main pollutants covered by the NEC Directive and the Gothenburg Protocol under the Convention on Long-range Transboundary Air Pollution.

36 needs to be updated to reflect the fact that all the countries have ratified the Convention but still need to ratify some protocols and take more active steps towards implementation. 36a is still needed but as little progress has been made, it needs to be made clearer who is going to make sure this happens.

37. Develop and implement Air Quality Strategies.

37a. Increase the uptake of Best Available Techniques in accordance with the Industrial Emissions Directive.

As only three of the countries have Air Quality Strategies, this point remains relevant but should include ‘and/or update’ to ensure the adopted strategies remain relevant. However, **it is also crucial for the countries to fully transpose and implement the Air Quality Directive, so this should be a new action.** All of them have started but only Montenegro has achieved full harmonisation with the Directive.¹⁸ Moreover, the EU has almost completed the process of updating the Directive, so the Western Balkans will need to transpose this new version within the Green Agenda period.

Regarding Best Available Techniques (BAT), this is very much needed but has to be broken down into more measurable steps and should be a separate action on its own, starting with the **full transposition of the Industrial Emissions Directive and its BAT reference documents.** The introduction and enforcement of **effective, proportionate and dissuasive penalties**, which is lacking in all countries, is particularly crucial. Again, the EU has recently adopted a [new version of the Industrial Emissions Directive](#), so even the countries which have advanced with transposition should update their legislation in the coming years and certainly before 2030.

38. Establish an adequate air quality monitoring system, including through accreditation of air quality monitoring networks.

This is still needed but should be more precise about what pollutants should be monitored, how ‘adequate’ is defined (how many monitoring stations, their location and what percentage of the time they have to be functional) and by when the network should be complete. Steps such as establishment of national reference laboratories should also be included.

39. Implement relevant EU water-related acquis (Water Framework Directive, Urban Waste Water Treatment Directive and Nitrates Directive).

This is of utmost importance but needs to be **split into three different actions** with the steps needed and clear timelines. ‘Full transposition’ should be included, as it has not yet taken place. For the Water Framework Directive, a recent legal analysis¹⁹ found that the core provisions have been transposed in all countries, but **the article 4(7) assessment is not regulated and does not take place in practice.** River

¹⁸ Davor Pehchevski, [Implementation of the Air Quality Directive by Western Balkan countries – 2022 update](#), CEE Bankwatch Network, 14 February 2022. As far as we are aware, not much progress has been made since then.

¹⁹ ClientEarth et al., [Are Balkan Countries Safeguarding Their Rivers? A Legal Analysis of Environmental Standards in Six Western Balkan Countries](#), ClientEarth, RiverWatch, EuroNatur, June 2024.

Basin Management Plans and Programmes of Measures are in place in most, but not all, of the countries, and in some cases need updating.

40. Modernise water monitoring infrastructure and reach good status for all water bodies.

Both of these are important but they are two separate things. Reaching good status is part of the Water Framework Directive and is the result of properly implementing the whole Directive, not just monitoring. Water monitoring infrastructure is also needed to reach the Directive's goals but due to the investment needed, can also be considered a separate action. However it has to be framed more specifically with clear tasks and deadlines.

41. Build the necessary infrastructure for wastewater treatment.

Again, this is needed but must be more specific, e.g. what percentage of the population must be covered by which year, and what the steps are to achieve this, including sludge disposal or usage. Again, we would like to underline here that sewage sludge, where safe enough, should be used for land rehabilitation and not be burnt in incinerators. More recently, proposals have also appeared to make [hydrogen from sludge](#) in Croatia. We consider this an extremely energy-intensive process that is likely to have an overall negative energy balance and would not support similar projects in the Western Balkans.

42. Integrate soil protection in other policy areas and establish a regional soil partnership to improve knowledge exchange and identify examples of best practices for soil protection from pollution and degradation.

Soil protection is crucial but this action is very vague and without real commitments. It is positive that an [MoU](#) has been signed on a regional soil partnership but more binding and timebound commitments are needed.

43. Prepare and sign regional agreements on transboundary air and water pollution.

This is too vague and should be deleted. With the International Commission for the Protection of the Danube River, Sava Commission and Energy and Transport Community Treaties in place, it is more important to implement existing commitments and other EU legislation than sign more agreements.

Sustainable Agriculture

We do not have significant expertise in this area so will not offer detailed proposals, however many of the comments elsewhere in this document apply to this section of the Action Plan as well, as the actions are too diffuse and multifaceted to be measurable.

Protection of Nature and Biodiversity

The biodiversity section of the Action Plan currently consists of **too many documents, too few binding commitments and too little on-the-ground implementation**. Moreover, the Implementation Report shows almost no real progress by the end of 2022 and we are not aware of substantial progress since then either.

The Roadmap split the biodiversity activities into three phases:

- 1) (2021-2022) developing baseline studies and assessments
- 2) (2022-2024) developing regional strategic documents and plans, and mechanisms for monitoring and reporting
- 3) (2024-2030) supporting the mobilisation of financial and human resources to promote the effective implementation of GAWB commitments and ensure regular monitoring and reporting on economy-wide and regional commitments.

This was already questionable as a certain amount of financial and human resources were needed to complete phases 1 and 2, which do not seem to have been secured. This also jeopardises phase 3.

Moreover, the Implementation Report fudged the issue of non-implementation by declaring that the phase 1 reports are no longer needed, while admitting that the existing data may not be of good enough quality:

‘Up to now, there was no shared Western Balkans Biodiversity Report; however government biodiversity strategies provide sufficient information on the status of biodiversity in Western Balkans.²⁰ The first phase (2021-2022) that was aimed at developing baseline studies and assessments can be considered completed. However, the quality of data depend on type of research done and may require more systematic and comprehensive data collection if to be used in the WB Biodiversity Strategic Plan.’

This contradictory finding leaves it open whether more research is needed or not. Our position is that the first GAWB phase (2021-2022) is not completed just because all countries at some point adopted biodiversity strategies and submitted reports to the CBD. These reports and strategies contain important information but are written by the governments and are written for another, more general purpose, so they lack concrete data relevant for the Green Agenda. Neither do they entail independent quality control, and cannot be taken at face value.²¹

This results in a dilemma: Good governance needs a good evidence base, yet so much time has been lost that if implementation of phase 1 is started now, nothing concrete will be achieved by 2030. Our proposal to overcome this, included in the table below, is to ramp up action now on the issues which are already

²⁰ The Implementation Report also says that the economy reports to the Convention on Biological Diversity (CBD) submitted between 2018 and 2020 can be used to gain an overview of the state of biodiversity according to the established indicators of the Convention.

²¹ To give two examples from North Macedonia’s latest CBD report:

1) The Report cites the Management Plan for the Natural and Cultural Heritage of the Ohrid Region as a step towards *Measure 3. Institutional, legal and financial framework for biodiversity conservation*. But in reality this document contains new plans for the further urbanization of the site. In fact, one of the recommendations by the Bern Convention in its open file for Lake Ohrid and Galichica National Park is revision of this plan precisely because of this and other negative outcomes for biodiversity conservation.

2) Implementation of EIA and SEA procedures reported to the CBD under implementation of *Measure 4. Incorporation of biodiversity in the spatial plan, national sectoral strategies and local plans*. But in reality EIA and especially SEA procedures are often used to greenwash destructive plans and actions; they often abound in legal breaches and the Ministry of Environment (as a rule) ignores civil society and public comments and gives positive opinions. Even when positive actions are defined in SEA Reports, such as the SEA for the Energy Strategy (highlighted in the Report to the CBD as a positive example), which proposes a ban on small hydropower plants in protected areas, they are not implemented. The Ministry of Environment prolonged several concessions for small hydropower plants in protected areas, not only after this SEA was adopted, but also contrary to the recommendation of the Bern Convention to cancel all concessions for small hydropower plants in the Mavrovo National Park.

clear, while carrying out country diagnostics on the current biodiversity protection situation and the changes needed to mainstream biodiversity protection and restoration across sectors. This should help to build a stronger base for future actions.

The Implementation Report also did not make clear what should be done to address the lack of progress on biodiversity actions and who should do it in reality. The Action Plan assigns the biodiversity-related tasks to the IUCN and in some cases to the IUCN and RCC together, which creates split responsibility. It also writes under the biodiversity roadmap that '*The Biodiversity Task Force (BDTF) for South East Europe (SEE) will facilitate the regional coordination of economy-wide commitments and propose regional and transboundary initiatives among Western Balkan economies and EU MS.*' However it is unclear whether the BDTF is still functioning effectively as the [related project on the IUCN website](#) ended in March 2021 and has only a few general sentences and no related documents posted. We have heard that meetings still take place, but no information about them is publicly available. Civil society groups that were not part of the BDTF such as Bankwatch would like to be involved in this work but even after talking to some of those involved, it is unclear how to go about this and who decides who participates. The revised Action Plan needs to set up effective leadership on this pillar: fast action is needed to make up for lost time.

In order to move forward with concrete actions as far as possible, our main premise for biodiversity in the Action Plan update is that without a strong legal framework and clear commitments by governments, regional studies or strategies run a high risk of remaining unimplemented. Among the key elements for this are the full transposition and better implementation of the **EU Habitats and Birds Directives**,²² **the completion of the Emerald network, better management of protected areas, and preparation for implementation of the Nature Restoration Law.**

Currently, the Action Plan contains no specific actions related to nature protection plans and for some reason the Emerald network – the most structured way to establish protected areas compatible with the Natura 2000 network – is not even mentioned in the Plan. In the past few years this network has been largely neglected by the Western Balkan countries,²³ even though its establishment, management and reporting is the most practical way to harmonise the region with the EU regarding habitats and species protection and is legally regulated through the Bern Convention and to some extent by national laws.

We therefore propose the following changes to the biodiversity section of the Action Plan, with an **emphasis on legal protection.**

²² We welcome that the Water Framework Directive is included under Depollution.

²³ The [Evaluation of the 2011-2020 Emerald Network work plan/ Proposal of a post-2020 work plan](#) adopted by the Bern Convention Standing Committee on its 40th Session in 2020 notes that 'the Western Balkan countries 'started the bio-geographical process back in 2011 with the first Emerald Network seminar in Montenegro. Unfortunately, no progress was recorded since as none of the countries have submitted an updated database. In 2017 the Secretariat did a great effort to re-vitalise the process and, although some countries showed an interest (Serbia and Montenegro), no concrete steps followed. It is also a pity that a number of EU-funded projects in relation to the reparations for the Natura 2000 process in the West Balkan region, did not stimulate progress in building the Emerald Network.'

EXISTING ACTION IN THE GREEN AGENDA ACTION PLAN	PROPOSED UPDATED/ NEW ACTION	ROADMAP	TIMELINE	RESPONSIBLE BODIES	INDICATORS
N/A - New action	Complete the transposition and implementation of the EU Birds and Habitats Directives	(1) Complete transposition according to national legislative procedures, including implementing legislation. (2) Ensure administrative capacity to implement the appropriate assessment procedure for impacts on Emerald sites, proposed Natura 2000 sites or other internationally recognised areas using the methodology of Article 6.3. of the Habitats Directive.	By 2Q 2026 By end 2026	Competent national authorities	Transposition completed in line with EU directives Appropriate assessment procedures carried out for all relevant projects according to the European Commission's guidance.
<p>Rationale: The countries have mostly transposed some parts of the Birds and Habitats Directives but none of them have done so fully.²⁴ As well as their failure to legally protect the majority of biodiversity-rich areas such as those nominated under the Bern Convention (see action below), the lack of <i>appropriate assessment</i> for projects with potentially significant impacts on protected or internationally recognised sites is a particular concern as it leads to sites being destroyed by construction or other works before they are legally protected or included in the Natura 2000 network once the countries become Member States. Implementation of these directives, as well as the Water Framework Directive that is already included under Depollution, is a precondition to achieve all the other actions effectively.</p>					
N/A - New action	Declare new protected areas in line with the 2030 CBD targets, 2030 Bern Convention Strategy and Emerald Network timeline proposed in 2024.	Follow national procedures to produce relevant studies, make proposals, declare protected areas including national Emerald networks, secure funding, draw up management plans and appoint staff.		Competent national authorities	
<p>Rationale: The share of land and sea areas legally protected in the Western Balkans is extremely low, e.g. 4 per cent of land in Bosnia and Herzegovina and 8 per cent in Serbia, compared to 26 per cent in the EU. This leaves extremely valuable sites open to damaging activities that are incompatible with biodiversity protection, particularly nominated candidate Emerald sites, but also sites which should be protected</p>					

²⁴ A recent legal analysis on river protection provides relevant information that could contribute to this: ClientEarth et al., [Are Balkan Countries Safeguarding Their Rivers? A Legal Analysis of Environmental Standards in Six Western Balkan Countries](#).

but have not yet been nominated.²⁵ Achieving the CBD 2030 targets of protecting at least 30 per cent of terrestrial and inland water areas, and of marine and coastal areas and restoring at least 30 per cent of areas of degraded terrestrial, inland water, and marine and coastal ecosystems will be a major challenge for the region and action must be taken immediately.

<p>51. Develop and implement a Western Balkans 2030 Biodiversity Strategic Plan.</p> <p>51a. Develop a Western Balkans Biodiversity Report.</p> <p>51b. Develop a Western Balkans Biodiversity Strategic Plan.</p>	<p>Develop and implement a Western Balkans 2030 Biodiversity Strategic Plan.</p>	<p>(1) Compile existing 2030 targets from the Convention on Biological Diversity (CBD), 2030 Bern Convention Strategic Plan and EU Biodiversity Strategy and propose an adaptation of the latter for the region.</p> <p>(2) Collect government, public and expert input on the main priorities.</p> <p>(3) Draft Strategic Plan including a short overview of the main issues</p> <p>(4) Consult with governments and public</p> <p>(5) Adjustments based on consultation</p> <p>(6) Endorsement by governments</p> <p>(7) Incorporation into national legislation and policies (where not done already).</p> <p>(8) Implementation as defined in law and policies.</p>	<p>1Q 2025</p> <p>1Q 2025</p> <p>End May 2025</p> <p>June 2025</p> <p>End July 2025</p> <p>4Q 2025</p> <p>By end 2027</p> <p>According to law and policies</p>	<p>To be decided (TBD)</p> <p>TBD. Governments and public to give input.</p> <p>TBD</p> <p>Governments and public to give input</p> <p>TBD</p> <p>Governments</p> <p>Incorporation by ministries, governments and parliaments</p> <p>Implementation according to laws and policies</p>	<p>Strategic Plan drafted and publicly consulted</p> <p>Strategy finalised and endorsed by governments</p> <p>Measures included in national legislation and policies</p> <p>Percentage of measures implemented</p>
	<p>Undertake country diagnostics on</p>	<p>(1) Develop terms of</p>	<p>1Q 2025</p>	<p>TBD</p>	<p>Country diagnostics drafted and</p>

²⁵ For example, in February 2023, a group of scientists and NGO representatives published [a list and map of 88 river stretches](#) which they identified as priorities for adding to the Emerald network.

implementation of biodiversity laws, plans, strategies and international commitments,²⁶ including mainstreaming and contradictions with other policies and laws.	reference	2Q 2025	TBD Governments, public and experts to give input.	publicly consulted
	(2) Collect government, public and expert input on the main issues and priorities.		NGOs/independent consultants	Diagnostics finalised and endorsed by governments
	(3) Draft diagnostics with proposed measures	3Q 2025	Governments and public to give input	Measures included in national legislation and policies
	(4) Consult with governments and public	4Q 2025	TBD	
	(5) Adjustments based on consultation	4Q 2025	Governments	Percentage of measures implemented
	(6) Endorsement by governments		Incorporation by ministries, governments and parliaments	
	(7) Incorporation into national legislation and policies.	1Q 2026	Implementation according to laws and policies	
	(8) Implementation as defined in law and policies.	By end 2027		
		According to law and policies		

Rationale: As mentioned above, we emphatically do not agree that Phase 1 has been completed, as reports to the CBD rely on self-reporting and biodiversity strategies are also not independent, so do not present a balanced picture of the biodiversity situation in the region. Nevertheless, time is running out until 2030 and on-the-ground progress is needed. As a number of actions needing to be taken are already well known, the **Strategic Plan** should be developed in a simplified way as soon as possible. Goals and targets should be based on the 2030 CBD targets, 2030 Bern Convention Strategic Plan and EU Biodiversity Strategy. The most important part of the Plan should be the specific activities for each country.

In parallel, independent **country diagnostics** could help to establish a more specific understanding of the barriers to biodiversity protection in each country and the measures needed to overcome them, including mainstreaming across sectors. The measures from both the regional Strategic Plan and the country diagnostics could then be included in national legislative and policy updates together, instead of the regional Strategic Plan having to wait for the national-level research to be completed.

52. Prepare nature protection and restoration plans including for marine areas.	Update National Biodiversity Strategies and Action Plans (NBSAPs)	Follow national-level legal process, including public consultations.	Update by end 2027 and end 2030.	Competent national authorities.	Plans updated, publicly consulted and adopted Percentage of actions implemented.
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²⁶ As of June 2024, out of ten current open files at the Bern Convention, five are from Western Balkan countries (North Macedonia – 2, Montenegro, Albania and BIH – 1 each). These cases provide relevant information about implementation of the related laws, strategies, plans, etc. and should be taken into account.

Rationale: The CBD anyway requires the preparation of NBSAPs, and the Parties have been [asked to update them in 2024, before COP16](#). So it does not seem justified to prepare separate plans. Currently, no further specific deadlines have been set under the Kunming-Montreal Global Biodiversity Framework but given the rapid action needed on biodiversity, we find it justified to update the documents at least once every three years, or twice more by 2030.

<p>53. Develop and implement a Western Balkans Forest Landscape Restoration Plan.</p> <p>53a. Prepare Restoration Opportunities Assessment Report.</p> <p>53b. Prepare Forest Landscape Restoration Plan (including a financial plan).</p>	<p>Prepare Restoration Opportunities Assessment Report</p>	<p>(1) Prepare terms of reference</p> <p>(2) Collect government, public and expert input on the main opportunities and undertake literature review</p> <p>(3) Draft report</p> <p>(4) Consult with governments and public</p> <p>(5) Adjustments based on consultation</p> <p>(6) Endorsement by governments</p> <p>(7) Incorporation into national legislation, policies and projects</p> <p>(8) Implementation</p>	<p>End 2025 1Q 2026</p> <p>End 2026 1Q 2027</p> <p>2Q 2027</p> <p>2Q 2027</p> <p>End 2028</p> <p>According to policies, legislation and projects</p>	<p>TBD</p> <p>TBD - governments and public give input</p> <p>TBD</p> <p>TBD - governments and public give input</p> <p>TBD</p> <p>Endorsement by governments</p> <p>Incorporation by competent ministries</p> <p>Implementation by ministries, public nature bodies</p>	<p>Draft report prepared and publicly consulted</p> <p>Report finalised and endorsed by governments</p> <p>At least two restoration projects from the Report per country underway by 2030</p>
	<p>Mainstream biodiversity into forestry plans at the national/regional/local level.</p>	<p>(1) Define measures to be included, by consulting with experts including civil society²⁷</p> <p>(2) Amend forestry plans</p> <p>(3) Implementation as defined in forestry plans and legislation.</p>	<p>2Q 2025</p> <p>First plans amended by end 2025²⁸</p> <p>Implementation as defined in plans</p>	<p>Environment ministries</p> <p>National/ regional/ local competent authorities</p>	<p>Measures defined</p> <p>At least one plan per country amended by the end of 2025²⁹</p> <p>All plans updated by 2030</p>

Rationale: Action 53 should be deleted as with all the different forestry plans at national, regional and local level (and lack of those in some countries like BiH) and the very different forest management and conservation systems, there is no real need for a region-wide plan. It is more important to mainstream biodiversity into forestry plans at the national/regional/local level and specifically define targets like minimum areas of non-management forests (at least 10 per cent of all forest areas per sub-national forestry unit, in line with the EU Biodiversity Strategy 2030), legal protection of old-growth forests (with a mean age of ≥ 100 years), percentage of forest certification, minimum area of sustainable forestry methods, etc.

<p>54. Analyse biodiversity benefits</p>	<p>N/A - we advise deleting this.</p>
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²⁷ In case legislative changes are needed, these should also be undertaken.

²⁸ 2026 in case of legislative changes being needed.

²⁹ 2026 in case of legislative changes being needed.

<p>of Nature-based Solutions and opportunities for their integration into the development of climate and other plans.</p> <p>54a. Report on climate change and biodiversity linkages</p>					
<p>Rationale: Part of this is duplicating Action 6 and it overlaps with Action 4. Instead of three separate actions, we consider that the links between biodiversity and climate and plans for green infrastructure should be built into adaptation strategies and plans, not treated as something separate. Please also see the comment under Action 6 for further explanation.</p>					
<p>55. Strengthen the mechanisms for regional cooperation and strategic planning on biodiversity conservation and implementation of the commitments under the Convention on Biological Diversity.</p>	<p>N/A - we advise deleting this.</p>				
<p>Rationale: This is not measurable and an effective implementation mechanism should be part of the governance structure for the GAWB. The Biodiversity Task Force was created but it is not active enough and doesn't result in implementation. See also our comments on Governance of the Green Agenda.</p>					
<p>56. Reinforce the engagement with the United Nations Rio Conventions (and synergy between the three), and join efforts in preparing a regional position on a global post-2020 biodiversity agenda.</p>	<p>N/A - we advise deleting this</p>				
<p>Rationale: This is not measurable, there are considerable overlaps with other actions, and most of the UNFCCC work should be under Climate Change, so this action could be deleted.</p>					
<p>57. Set up the Western Balkans Biodiversity Information Hub to improve knowledge exchange and availability of</p>	<p>Implement biodiversity reporting as required by the Bern Convention, Article 12 of the Birds Directive and Article 17 of the Habitats</p>	<p>Follow steps defined by the Bern Convention, directives and relevant guidance.</p>	<p>According to the schedule set by the Bern Convention and directives.</p>	<p>Competent national authorities</p>	<p>Complete reports submitted on time</p>

information. 57a. Biodiversity Monitoring and Evaluation Framework.	Directive.				
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Rationale: There is no need for a separate hub and additional burden for the countries, but biodiversity reporting under the Bern Convention and in line with Article 12 of the Birds Directive and Article 17 of the Habitats Directive needs to be implemented by each country.

58. Development of Green Infrastructures and ecosystem connectivity.	Legally protect and manage areas of importance for ecosystem connectivity.	<p>(1) Identify areas to be protected for connectivity, together with relevant experts including civil society.</p> <p>(2) Identify steps needing to be taken, e.g. recommendations from section 5.2.2 of the European Commission's Study on green infrastructure deployment and ecological connectivity status in Albania, Bosnia-Herzegovina, Montenegro, Serbia and North Macedonia.</p> <p>(3) Design project and apply for funds</p> <p>(4) Further implementation according to project and legal changes needed</p> <p>(5) Regularly monitor and report on progress.</p>	<p>End June 2025</p> <p>End June 2025</p> <p>End 2025</p> <p>According to project, but legal protection by end 2027.</p> <p>Every six months minimum.</p>	National authorities, in consultation with experts including civil society.	<p>At least one project started in each country by mid-2026</p> <p>At least one area important for connectivity legally protected per country with management plan and administration in place by end 2027</p>
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Rationale: Green infrastructure is a much wider field than ecosystem connectivity so we have included it under Action 4 on climate adaptation. For ecosystem connectivity, it is important to move forward with concrete protection measures. We particularly highlighted section 5.2.2 of the European Commission study since the steps are concrete and are the most likely ones to lead to legal protection and proper management.

CEE Bankwatch Network



EcoZ,
Kosovo



Environmental Citizens'
Association Front 21/42,
North Macedonia



Center for environmental
research and information Eko-
svest Skopje
Macedonia



Environmental center for
Development Education and
Networking (EDEN center),
Albania



Center for Environment / FoE
Bosnia and Herzegovina,
Bosnia and Herzegovina



Protection and Preservation of
Natural Environment in Albania
(PPNEA),
Albania



Network Albania,
Albania



Group of Rural Activists of Dibra-
GARD,
Albania



Belgrade Open School,
Serbia



Resource Environmental Center
(REC) Albania,
Albania



Resource Environmental Center
(REC) North Macedonia,
North Macedonia



NGO Eco-team,
Montenegro



Climate Action Network (CAN)
Europe



Resource Environmental Center
(REC) Bosnia and Herzegovina,
Bosnia and Herzegovina



Resource Environmental
Community (REC) Montenegro,
Montenegro



Aarhus Centar in BiH,
Bosnia and Herzegovina

