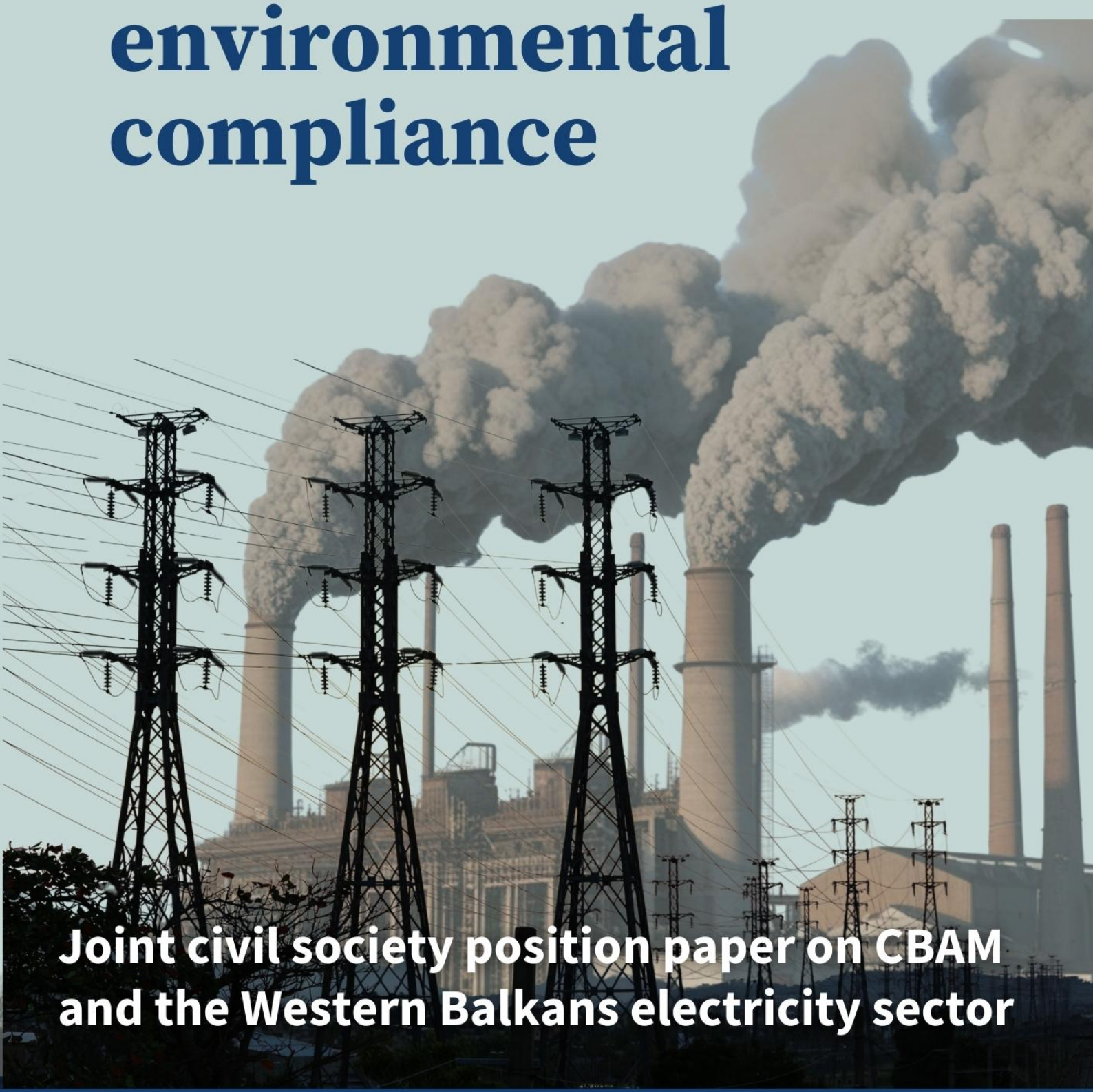
Electricity market integration needs environmental compliance



Joint civil society position paper on CBAM and the Western Balkans electricity sector

CEE Bankwatch Network

BOS Belgrade Open School

Co-funded by the European Union

March 2026

Contents

This material was produced with the financial support of the European Union. Its contents are the sole responsibility of CEE Bankwatch Network and Belgrade Open School and do not necessarily reflect the views of the European Union.

Cover photo: Luizsouzarj, Sumali Ibnu Chamid, Canva

Summary

Before the EU's Carbon Border Adjustment Mechanism (CBAM)[1] definitive regime began on 1 January 2026, none of the Western Balkan countries had met the conditions for exemptions in the electricity sector, and numerous questions remained about how CBAM would work in practice.[2] Two and a half months in, EU Member State purchases of electricity from the Western Balkan countries have in some – but not all – cases decreased.

These factors have led some stakeholders to question whether CBAM should be delayed in the electricity sector, and in some cases whether electricity should even remain included at all. After all, the Energy Community Treaty[3] has for 20 years promoted integration of the Western Balkans' energy markets with those of the EU – a process which CBAM is now impacting.

This position paper argues, however, that market integration, although desirable, must not come at the expense of environmental and climate compliance in the electricity sector.

The region's antiquated and deadly coal plants are already infamous,[4] but the problem is much wider: basic EU safeguards like environmental impact assessments, protection of valuable natural areas under the Habitats and Birds Directives, and protection of rivers and lakes under the Water Framework Directive are not properly applied in the region, including for renewable energy projects. Western Balkan governments want to participate in the EU energy markets without playing by the rules, giving the countries an unfair advantage.[5]

CBAM finally provides clear deadlines for the countries to either face its consequences or gain exemptions – among others by introducing emissions trading systems. It provides powerful incentives to apply EU law, at least in the energy and climate arena.

Whereas the Energy Community Treaty lacks financial penalties, allowing its Contracting Parties to procrastinate for years on compliance, CBAM will have a concrete impact on the income made by electricity

[1] European Parliament, Council of the European Union, Regulation (EU) 2023/956 of the European Parliament and of the Council of 10 May 2023 establishing a carbon border adjustment mechanism, OJ L 130, 16 May 2023.

[2] The start of CBAM certificates sales will happen from 1 February 2027 but still cover the period from 1 January 2026. So any importer wanting to minimise imports from carbon-intensive countries would still have done so from 1 January 2026.

[3] For more information, see the Energy Community Secretariat's website.

[4] See the *Comply or Close* report series for more information.

[5] Pippa Gallop, Inclusion of the Habitats, Birds and Water Framework Directives in the Energy Community Treaty: An urgent imperative, CEE Bankwatch Network, 1 December 2025.

generators, including state-owned utilities, thus providing a strong motivation for the countries to meet the exemption criteria.

Although all the countries are currently far from being exempt, Serbia, Montenegro and Moldova have transposed the legislation needed for electricity market coupling[6] – the first precondition for exemption from CBAM. Montenegro has also recently committed to carbon neutrality by 2050.

The answer is not for the EU to give up on CBAM in electricity, but for the exporting countries to finally comply with the relevant EU rules, including environmental safeguards.

This would not only bring major benefits like cleaner air and water, but introducing carbon pricing would also allow the countries to mobilise resources to fund a just energy transition.

The region's governments are clearly not yet convinced, but the European Commission will ultimately do both the EU and the region a favour by applying the CBAM exemption criteria and reductions in CBAM charges strictly. Insisting that the countries meaningfully advance on decarbonisation in order to gain CBAM exemptions for electricity will help to make up for the lack of enforcement mechanisms in the Energy Community Treaty.

But the Commission also needs to apply joined-up thinking across the board by conditioning access to EU funds for energy on enforcement of the Energy Community Treaty, and by insisting on full transposition and enforcement of nature and water protection safeguards in the countries, to improve renewable energy sustainability.

The EU also needs to send clear signals with its domestic policies. In this respect, recent calls by Italy's government and others to suspend the ETS are extremely irresponsible and reflect Member States' short-sighted energy policies. The EU must maintain and improve the effectiveness of the ETS, to advance its climate action and ensure predictability.

The EU also needs to show the Western Balkans it is serious about supporting a just transition by earmarking financial support for carbon-intensive regions in the next EU long-term budget. Only this way can we ensure a level playing field in the electricity sector and a more sustainable energy transition.

[6] Energy Community Secretariat, Montenegro sets course for EU electricity market coupling with newly adopted legal framework, 20 February 2026.

Introduction

Two and a half months into the definitive regime of the EU's Carbon Border Adjustment Mechanism (CBAM),[7] all the Western Balkan countries remain far away from gaining exemptions in the electricity sector.

This means their electricity exports to the EU are now subject to CBAM charges of around EUR 75 to 80 per tonne of carbon dioxide[8] involved in their generation, which has to be paid by the importing companies in the EU. This makes their electricity exports substantially less attractive for EU importers than before.

The Western Balkan countries' unreadiness for this development, as well as considerable unclarity around some aspects of implementation on the EU's side, has caused wide debate in the last year or so. As outlined below, some stakeholders requested delays to CBAM in the electricity sector, while others have suggested that the sector be removed from CBAM altogether, to ensure continued market integration between the Western Balkans and the EU.

The European Commission stood firm, but made adjustments that were adopted in October 2025.[9] In December, the Commission adopted implementing acts on calculation methodologies, and proposed further changes to the CBAM Regulation to include downstream goods and anti-circumvention measures[10] before the definitive regime started on 1 January 2026.

This position paper looks at CBAM's impacts in the electricity sector so far, as well as the countries' progress in gaining exemptions under the conditions set out in the CBAM Regulation. It argues that electricity market integration is crucial but must not come at the cost of environmental and climate compliance. CBAM, with its fixed deadlines and built-in financial impacts on the Western Balkan countries, finally provides a powerful incentive to ensure energy and climate compliance, and both the EU and Western Balkans must seize this opportunity.

The paper provides recommendations, calling on the Commission to apply the CBAM exemption criteria stringently, but also to undertake other measures to ensure a level playing field in the electricity market by ensuring that Western Balkan countries apply EU nature and water safeguards and have access to just transition funding for carbon-intensive regions.

---

[7] European Parliament, Council of the European Union, Regulation (EU) 2023/956 of the European Parliament and of the Council of 10 May 2023 establishing a carbon border adjustment mechanism.

[8] European Energy Exchange AG, EEX Market Data, accessed 19 February 2026.

[9] European Parliament, Council of the European Union, Regulation (EU) 2025/2083 of the European Parliament and of the Council of 8 October 2025 amending Regulation (EU) 2023/956 as regards simplifying and strengthening the carbon border adjustment mechanism, OJ L, 2025/2083, 17 October 2025.

[10] European Commission, Commission strengthens the Carbon Border Adjustment Mechanism, 17 December 2025; European Commission, Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) 2023/956 as regards the extension of its scope to downstream goods and anti-circumvention measures, 17 December 2025.

CBAM in the electricity sector

CBAM is designed to ensure that the EU takes responsibility for carbon emissions embodied in products it buys from abroad by imposing a charge for their import into the EU. It aims to prevent 'carbon leakage', in which EU-based countries relocate outside of the bloc to achieve lower production costs by not having to pay a carbon price under the EU's Emissions Trading System (ETS). It also seeks to create incentives for the reduction of emissions by operators in non-EU countries who export to the EU, by encouraging them to establish domestic carbon pricing mechanisms.

CBAM's transitional phase, which involved quarterly reporting by EU importers of iron and steel, cement, fertiliser, aluminium, hydrogen and electricity produced outside the European Union, ran from 1 October 2023 until the end of 2025. Since 1 January 2026, goods covered by CBAM have been subject to charges based on the emissions embedded in them.

Either individually or through a representative, EU importers have to register with national authorities to buy CBAM certificates, which they later surrender based on their imports.

The price of the certificates is calculated depending on the weekly average auction price of EU ETS allowances. In the electricity sector, the per-unit emissions are calculated based on default emissions factors for each exporting country.

Through this mechanism, importers of goods from outside the EU pay as much for the corresponding greenhouse gas emissions as if the goods had been produced in the EU, thus creating a level playing field.

CBAM certificates are neither tradeable nor bankable and are cancelled as soon as they are surrendered for compliance. Revenues will go to the EU budget. Some of them may be returned to non-EU countries via EU funds that can support decarbonisation, but there is no specific provision ensuring that this is the case.

CBAM makes imports to the EU from countries with high levels of fossil fuel use (coal, oil and gas) in the relevant sectors much more expensive than they have been so far. In the electricity sector, Italy, Croatia, Hungary, Romania, Bulgaria and Greece are the Western Balkan countries' main EU trading partners. CBAM incentivises them to find other generation sources or face high costs.

Of the Western Balkan countries, prior to the start of CBAM's definitive regime, Bosnia and Herzegovina, Montenegro and North Macedonia traded the largest proportion of their electricity with the EU and thus looked set to be hardest hit by CBAM in this sector. Bosnia and Herzegovina and Montenegro have been net exporters in recent years, and North Macedonia is not a net exporter, but trades actively with Greece and Bulgaria.

CBAM is unique in that Western Balkan countries cannot choose the pace of implementation, so it has attracted considerable attention and consternation in the region since it was included in the European Green Deal in late 2019.[11]

But what it does have is a built-in possibility for the Contracting Parties to the Energy Community Treaty to be exempted in the electricity sector, provided they meet certain conditions, under Article 2.7.[12] Another possibility for partial exemptions is laid out in Article 9, based on a carbon price having been already paid in the exporting country.

Doubts, debates and denial in the run-up to CBAM

In the year or so leading up to the start of the CBAM definitive regime, diverse stakeholders raised issues related to its functioning, particularly in the electricity sector. Their requests ranged from technical clarifications to requests for postponement or even taking electricity out of CBAM altogether. Below we provide an overview of the issues raised, followed by our views.

The Energy Community Secretariat, in its October 2025 CBAM Readiness Tracker, highlighted the need for clarity on how to establish the origin of electricity imports to the EU due to the Western Balkans often acting as transit countries, which may distort the allocation of costs under CBAM.[13]

It also reported stakeholder concerns on the same default emission factor being assigned to all electricity imports regardless of the origin of production, using the emission intensity of the fossil-fuel-based part of the generation mix in the generating country as the basis for the calculation. This, stakeholders argued, might hinder new investments in renewable energy in Contracting Parties, potentially endangering the achievement of the Energy Community 2030 renewable targets. Although the CBAM Regulation does allow actual emissions to be used for electricity from individual plants, operators report that these may be impossible to meet in reality.[14]

Hindering renewables development has been the most common concern raised about CBAM in electricity, though not necessarily with the Western Balkans' 2030 targets in mind.

The European Network of Transmission System Operators for Electricity (ENTSO-E) is one body that has raised this issue, arguing that the CBAM rules on calculation of actual emissions from electricity generation are impossible to apply and that this *'... could contradict the goal of efficiently importing cheap green*

[11] European Commission, Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social Committee and the Committee of the Regions - The European Green Deal, COM/2019/640 final, EUR-Lex, 11 December 2020.

[12] European Parliament, Council of the European Union, Regulation (EU) 2023/956 of the European Parliament and of the Council of 10 May 2023 establishing a carbon border adjustment mechanism.

[13] Energy Community Secretariat, Energy Community CBAM readiness tracker 2025, October 2025.

[14] Ibid.

electricity into the EU if applied also to third countries with robust decarbonisation policies and renewable energy sources.'[15]

EFT Group, which both generates and trades electricity in southeast Europe, also asked for renewable energy to be removed from CBAM. Failing that, regarding the CBAM conditions for applying actual emission values rather than default emission factors to renewable energy exports, it asked at least for Western Balkan renewable energy exports to be exempted from the criterion on non-congestion of the grid. It also asked for the transition period to be extended by at least a year.[16]

A *Bruegel* article went even further, proposing to remove electricity from CBAM altogether, arguing that there is no obvious risk of carbon leakage in the electricity sector, as proven by the phase-out of free allowances under the ETS. It also highlighted the issues regarding renewables development and market integration, as well as criticising the use of a five-year average to calculate default emissions values due to the fact that electricity exports usually take place when renewable generation is high. In cases like the UK, it pointed out that the electricity mix has changed considerably in the last five years, rendering a five-year average obsolete.[17]

Failing the removal of electricity from CBAM, *Bruegel* argued that its inclusion should be delayed until 2028; that a five-year trailing average should be substituted by average grid emission factors calculated on an hourly or 15-minute basis, administered by ENTSO-E and national transmission system operators; and that the period until 2028 should be used to obtain more evidence about the extent of the risk of carbon leakage in the electricity sector.[18]

From the EU side, the European People's Party group in the European Parliament asked for the whole CBAM to be put on hold for at least two years and simplified so that its scope would be limited to larger companies.[19]

Once the Western Balkan governments saw that they would not meet the exemption deadlines for CBAM, they also started lobbying for delays. Montenegro and Bosnia and Herzegovina publicly requested postponement in December 2024,[20] and as late as October 2025 the energy minister of Bosnia and

[15] European Network of Transmission System Operators for Electricity (ENTSO-E), ENTSO-E position on the revision of the Carbon Border Adjustment Mechanism, 5 June 2025.

[16] EFT Group, Feedback to European Commission Consultation on Carbon Border Adjustment Mechanism (CBAM) – downstream extension, anti-circumvention and rules on electricity emissions, 26 August 2025.

[17] Ben McWilliams, Rouven Stubbe, Georg Zachmann, The case for delaying the application of the EU's carbon border levy to electricity, Bruegel, 19 November 2025.

[18] Ibid.

[19] EPP, Europe needs more growth and jobs – Enhancing competitiveness by cutting back bureaucracy and over-regulation, January 2025.

[20] Vladimir Spasić, 'BiH, Montenegro ask EU to delay CBAM', Balkan Green Energy News, 16 December 2024.

Herzegovina's Republika Srpska made misleading public statements suggesting that the European Union may postpone implementation.[21]

Most of the issues raised about CBAM in the electricity sector are valid to at least some extent, with the exception of the requests for postponement by the Western Balkan governments: these were solely the result of them having failed to prepare for CBAM and did not deserve serious consideration.

If the Western Balkan countries are to integrate into the EU, the governments finally need to learn that deadlines must be met and that they cannot expect 27 other countries and all the EU institutions to bend over backwards to accommodate their tardiness.

Although the other calls for delays to CBAM in the electricity sector for one or two years were made for different reasons, we welcome the fact that the Commission found a compromise between addressing the issues and still covering the period from 1 January 2026.

Too often in recent years EU legislation has stopped, started and been constantly re-opened, which is totally counterproductive to the goal of 'simplification', reduces predictability for governments and companies, and increases EU-scepticism among the public. Although changes are still being made to CBAM, at least the start date has remained unchanged, sending a clear signal to Western Balkan governments that they cannot negotiate their way out of everything.

Where we differ in our views from many of the stakeholders above is that they mainly look at CBAM from the point of view of renewable energy companies, whereas we insist it should be looked at more widely. The advantages of CBAM in depriving fossil-fuelled power plants – most of which breach pollution control limits by many times – of income from export revenues must also be taken into account, not only the disadvantages for renewables companies.

It is true that for the last decade or so, carbon leakage has not been taking place in the electricity sector in the narrow sense of the term: building new carbon-intensive facilities outside the EU with the aim of exporting to the bloc while avoiding carbon pricing.

But it has very much been taking place in the wider sense of importing carbon-intensive electricity which was cheap only because the plant operators did not pay a carbon price and because they continue to massively breach the pollution control standards that have been mandatory under the Energy Community Treaty since 2018. And these standards – set by the Large Combustion Plants Directive[22] – are still much weaker than the current EU ones.[23]

---

[21] Vladimir Spasić, 'Đokić: We expect EU to accept request to postpone CBAM implementation', Balkan Green Energy News, 10 October 2025.

[22] Directive 2001/80/EC of 23 October 2001 on the limitation of emissions of certain pollutants into the air from large combustion plants, Energy Community, 23 October 2001.

[23] European Commission, Commission Implementing Decision (EU) 2021/2326 of 30 November 2021 establishing best available techniques (BAT) conclusions, under Directive 2010/75/EU of the European Parliament and of the Council, for large combustion plants, EUR-Lex, 30 December 2021.

Although we share these critics' goal of increasing the proportion of wind and solar in the Western Balkans, this should be mainly aimed at fulfilling domestic renewable energy targets, not mainly at export. The sustainable potential in the countries is not endless and ENTSO-E's allusion to a goal of 'importing cheap green energy into the EU' is worrying considering the difference in environmental standards – including for renewables – between the EU and Western Balkans.

For example, the environmentally sensitive Herzegovina region, near Bosnia and Herzegovina's border with Croatia, is currently undergoing extremely rapid and largely uncontrolled solar and wind development, with no strategic environmental assessment and no sensitivity mapping. This is already meeting with substantial local resistance due to lack of proper assessments and public consultation. Export-driven investments exacerbate such negative trends and further undermine the already low environmental governance standards in the countries.

Although we are highly committed to a rapid phase-out of fossil fuels, because of the inclusion of hydropower and biomass as renewable in EU legislation, and because of experiences like that in Herzegovina, we do not find an assumption that renewables are automatically good to be helpful. Thus any blanket exemption for renewables from CBAM is unacceptable and only plants which were built and which operate in line with EU environmental legislation should be allowed to use actual emissions factors.

It is particularly galling to see EFT Group requesting exemptions for renewables plants considering it is the operator of the appalling Ulog hydropower plant on the upper Neretva in Bosnia and Herzegovina. The plant was built in the middle of a nominated candidate Emerald site, and its construction continued against the recommendations of the Bern Convention.[24] Its environmental permit stipulates that it must operate in run-of-river mode,[25] but in reality it is operating in peak mode,[26] exacerbating its downstream impacts.[27] Moreover, in September 2025, a massive fish die-off confirmed its negative impacts on the otherwise relatively unspoilt upper reaches of the Neretva.[28]

This is but one example of the damage wrought by uncontrolled hydropower development in the Western Balkans, and demonstrates the need to take into account compliance and not only a plant's status as 'renewable'.

Given that carbon-intensive electricity has for years been imported into the EU without its operators either paying a carbon price or adhering to EU pollution control rules, it is in our opinion essential to keep

[24] Convention on the Conservation of European Wildlife and Natural Habitats Standing Committee Recommendation No. 217 (2022) of the Standing Committee on the possible negative impact of hydropower plant development on the Neretva River (Bosnia and Herzegovina), 2 December 2022.

[25] Republika Srpska Ministry for Spatial Planning, Construction and Ecology, Rješenje broj 15.04-96-37/21, 7 July 2021.

[26] Federalno ministarstvo okoliša i turizma, Informacija o slučaju HE "Ulog" i aktivnosti FMOIT-a, 2 December 2025.

[27] Center for Environment, Possible negative impact of hydro-power plant development on the Neretva River (Bosnia & Herzegovina) - Complainant report, Bern Convention, 2 December 2025.

[28] Center for Environment, Naučnici iz cijele Evrope poslali pismo bh. vlastima: Hitno preispitati rad HE Ulog i istražiti pomor ribe!, 1 October 2025.

electricity in CBAM. And renewable energy should not be exempted en masse, as its development should primarily be aimed at increasing the renewables share of the Western Balkan countries, not exports.

Where real issues are arising, the Commission's proposals to further refine CBAM[29] are generally going in the right direction. For example, we agree it makes more sense to use overall default emission factors for the countries rather than ones based only on their fossil fuel electricity generation.

Our only caveat is that the Memoranda of Understanding with exporting governments planned by the Commission with regard to Article 2.7 exemptions must be fully publicly available and that Article 2.7 must still be applied stringently. The current rate of progress towards exemptions means that there may be a temporary slowdown in electricity market integration, but this is not the EU's fault – it is the fault of the Western Balkan governments and electricity utilities for failing to prepare on time. If it takes time to fix this, so be it.

The Commission must not allow any of the countries special concessions as it will again send the message that they can negotiate their way out of having failed to act on time.

CBAM's electricity sector impacts so far

It is still too early to see the full impacts of CBAM, but the evidence so far suggests the electricity sector has been somewhat affected, though less in February than January.

In January 2026, energy economist Rouven Stubbe reported that power prices in the Western Balkans[30] had been trading at a significantly lower level than EU prices since the beginning of the year. The difference between the asking prices of exporters from Albania, Montenegro, North Macedonia and Serbia and the offers from their respective EU neighbours increased from an average of EUR -2 per megawatt hour (MWh) in October to December 2025 to EUR 28/MWh for the first three weeks in January, reflecting importers' expectations that they would have to pay CBAM charges on imports carried out since 1 January.[31]

Imports of electricity from the Western Balkans to Croatia, Italy and Romania also dropped somewhat in January and February 2026 compared to previous years. Imports to Bulgaria from the region continued on a downward trend, but did not see any sudden drop. However, imports to Hungary were somewhat higher in February than has been the case in recent years.

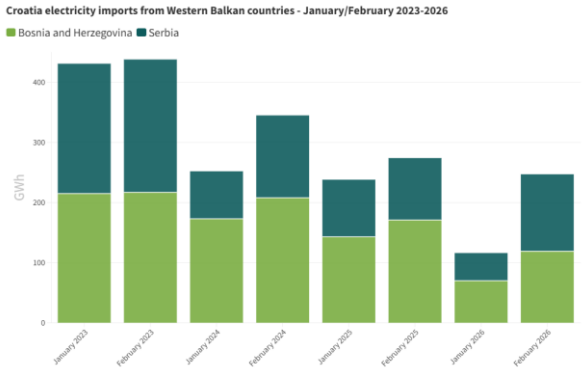
---

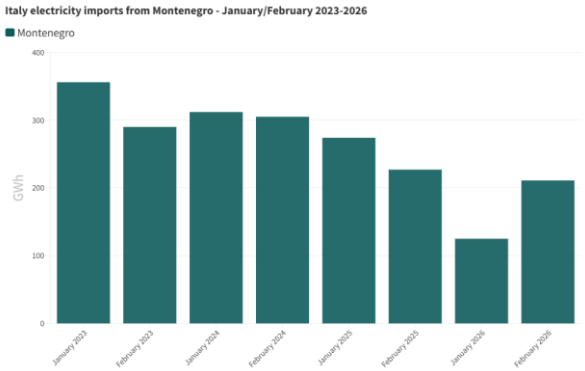
[29] European Commission, Commission strengthens the Carbon Border Adjustment Mechanism; European Commission, Proposal for a Regulation of the European Parliament and of the Council amending Regulation (EU) 2023/956 as regards the extension of its scope to downstream goods and anti-circumvention measures.

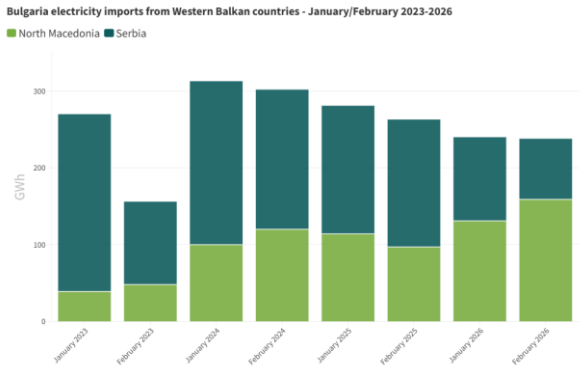
[30] Excluding Bosnia and Herzegovina due to a lack of day-ahead market and hence hourly price data

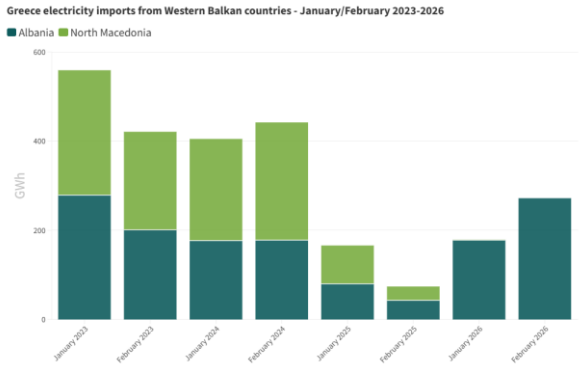
[31] Rouven Stubbe, CBAM's definitive phase is now live for three weeks – and it has already profoundly reshaped Southeastern European electricity markets! January 2026.

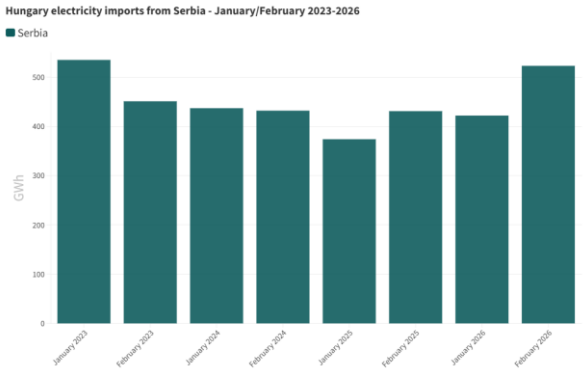
Imports to Greece from North Macedonia have dropped dramatically, but this was visible already at the beginning of 2025. It is mainly due to an increase in gas and solar generation in Greece leading to the country being a net electricity exporter for 11 out of 12 months in 2025,[32] and so the decrease in imports is only partly connected to CBAM. Imports from Albania to Greece have continued in the first two months of 2026, and even increased compared to 2025, but it seems unlikely they will persist during sunnier seasons.

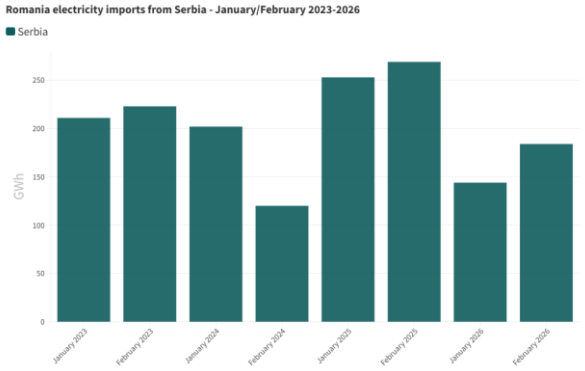












[32] The Green Tank, Trends in electricity production – December 2025, 2 February 2026.

A decrease in electricity exports from the Western Balkans to the EU is likely to have mixed effects. Low electricity sales prices may have a dampening effect on some planned renewable projects which are not supported by premiums. This is a source of concern given the need to greatly ramp up the region's solar and wind share in the coming years.

Still, as explained above, large-scale renewable projects in the region need to be examined on a case-by-case basis due to the lack of public participation and environmental safeguards in the planning process, as well as the prevalence of corruption in the region.

On the other hand, low electricity export prices will also make it less worthwhile to run the region's appallingly polluting coal power plants. This is because the state-owned utilities are legally obliged to sell their electricity to households at very low, highly-regulated prices.

So if their options to export electricity at higher prices are reduced, their income will be lower and they may finally decide to close some of the smaller and older coal power plants which are already running illegally, like Pljevlja in Montenegro, Tuzla 4 and Kakanj 5 in Bosnia and Herzegovina, and Morava and Kolubara in Serbia.[33] It should also prompt them to finally plan more seriously for an orderly phase-out of coal power altogether.

This is much-needed – not only because of their pollution and the need to decarbonise, but also because the region's coal power units, with an average age of 48 years,[34] are becoming less and less reliable.[35] Yet the governments lack the courage or vision to tackle this major political hot potato.

For sure it will not be easy as it requires not only an energy transition but also a just transition involving the reskilling of workers and redevelopment of coal regions. This in turn requires a level of genuine public participation and bottom-up planning which is not currently encouraged or tolerated by Western Balkan governments.

Both the growth of solar and wind and the region's coal phase-out will happen in the coming decades with or without CBAM, but we expect CBAM will accelerate the latter. Still, if governments do not move to secure exemptions from CBAM, the income generated from it goes into the EU budget. This represents a major missed opportunity for the Western Balkan governments to raise income from their own carbon pricing systems to use for the energy transition and redevelopment of coal regions.

[33] For more information, see CEE Bankwatch Network, Comply or Close 2025 update, June 2025.

[34] Not including Kostolac B3 in Serbia, which reportedly came online in December 2024.

[35] For an overview of electricity generation trends and recent declines in coal generation, see Ioana Ciuta and Pippa Gallop, A perfect storm - The Western Balkans power section in the time of CBAM, October 2025.

What now? CBAM exemption options for electricity

In order to be exempted from CBAM in the electricity sector under Article 2.7 of the CBAM Regulation, the countries have to have:

- their electricity market integrated with the EU's through market coupling.[36]
- an agreement with the EU setting out an obligation to apply EU law on electricity, including on the development of renewable energy sources and other rules in the field of energy, environment and competition – in other words, the Energy Community Treaty.
- transposed into domestic legislation the main provisions of EU electricity market legislation, including on renewable energy sources and market coupling.
- submitted a roadmap to the Commission with a timetable for the measures below.
- legally committed to climate neutrality by 2050 and, where applicable, submitted a corresponding long-term strategy to the United Nations Framework Convention on Climate Change (UNFCCC).
- demonstrated fulfilment of the roadmap's deadlines and made substantial progress towards aligning legislation with EU law on climate action, including towards carbon pricing at a level equivalent to that in the EU, at least for electricity. An emissions trading system for electricity, with a price equivalent to the EU ETS, is to be implemented by 1 January 2030.
- put in place an effective system to prevent indirect import of electricity into the Union from other third countries or territories that do not fulfil the above conditions.

Meanwhile, Article 9 also allows importers to claim a reduction in the number of CBAM certificates to be surrendered in order to take into account a carbon price paid in the country of origin for the declared embedded emissions.

The following exception looks at how the countries are advancing in potentially gaining CBAM exemptions in the electricity sector.

[36] This – and thus the other provisions of Article 2.7 – only applies if no technical solution has been found for the application of CBAM to the import of electricity into the EU from that country.

Western Balkan countries' progress towards exemption

None of the Western Balkan countries are near to meeting the criteria under Article 2.7. The Energy Community Secretariat confirmed this in its October 2025 CBAM-readiness tracker, stating that the earliest any of the countries could complete market coupling – just one of the steps – is in 2027.[37] None of them currently apply meaningful carbon pricing that could allow them to utilise Article 9 either.

The CBAM Readiness Tracker provided a comprehensive overview of the Western Balkan countries' progress towards fulfilling the Article 2.7 criteria as of October 2025. Below, we therefore only provide updates since then and other insights not mentioned by the Energy Community Secretariat.

Albania

Albania currently has a default emissions factor of zero for electricity under CBAM,[38] because its domestic electricity generation is almost entirely based on hydropower, with just three per cent solar in 2024,[39] and the CBAM factors are currently based on the average emissions of fossil fuel generation over a five-year average.

However, in recent years it has hired floating oil-fired power plants and is planning to build at least one gas-fired power plant as well. So far the oil-fired plants have hardly operated, but if they do so in the future, and/or if the gas plants are built, its emissions factor would increase, thus negatively impacting electricity exports to Greece.

We are not aware of any significant steps towards gaining an exemption since October 2025.

Bosnia and Herzegovina

From 2014 to 2023, Bosnia and Herzegovina exported on average about 21 per cent of the electricity it produced to the EU (Croatia).[40] Thus, it was expected to be among the countries in the region most affected by CBAM. The data above shows that indeed exports to Croatia fell in January and February 2026 compared to previous years.

Although CBAM has sparked significant discussion in the country, ultimately the authorities did little to prepare for it – instead asking the Commission for postponements. Moreover, as mentioned above, its Tuzla

[37] Energy Community Secretariat, Energy Community CBAM readiness tracker 2025.

[38] Commission Implementing Decision Regulation (EU) 2025/2621 of 16 December 2025 laying down rules for the application of Regulation (EU) 2023/956 of the European Parliament and the Council as regards the establishment of default values, EUR-Lex, 31 December 2025.

[39] Enti Rregullator të Energjisë (ERE), Gjendja e Sektorit të Energjisë dhe Veprimtaria e Entit Rregullator të Energjisë gjatë Vitit 2024, 2025.

[40] Eurostat, Imports of electricity and derived heat by partner country, NRG_TI_EH, updated 17 October 2025.

4 and Kakanj 5 coal units are still running illegally after failing to close following a limited lifetime derogation.[41]

Coal generation has decreased compared to 2017 when its share peaked at 75 per cent,[42] but this is not due to deliberate policies – rather difficulties in securing enough coal of sufficient quality. In 2024, coal generation made up 58 per cent, hydropower 35 per cent, solar 4 per cent and wind 2.7 per cent.[43]

We are not aware of any significant steps towards gaining an exemption since October 2025.

Kosovo

Given that it does not have a direct border with EU countries, Kosovo was not expected to be among the countries most affected by CBAM in the electricity sector. Still, in order to be able to further integrate with its neighbours who do border the EU, it should still pursue an exemption under Article 2.7.

In 2024, 90.4 per cent of Kosovo's domestically generated electricity came from coal, down from 96.4 per cent in 2020. But this reflected technical problems rather than an intentional reduction. Wind power reached 5.7 per cent, hydropower remained at 3.6 (reflecting the government's policy to avoid promoting it due to low potential and high environmental impacts), and solar continued to languish at 0.3 per cent, despite several projects in the pipeline.[44]

Unfortunately, 2025 was largely a lost year for Kosovo due to a political crisis that prevented the formation of a government after parliamentary elections. As a result, we are not aware of any significant steps towards gaining an exemption since October 2025. A new government was finally formed in February 2026, potentially paving the way for some steps forward.

Montenegro

In recent years, Montenegro has become a net electricity exporter, so along with Bosnia and Herzegovina it was expected to be hit relatively hard by CBAM in the electricity sector. Its electricity generation is not the most carbon-intensive in the region, but in 2024, coal still made up nearly 39 per cent, all of which came from the Pljevlja plant operating illegally.[45] Hydropower accounted for 51 per cent, wind 8.5 per cent and solar 1.8 per cent.[46]

[41] CEE Bankwatch Network, Comply or Close 2025 update.

[42] International Energy Agency, Energy Statistics Data Browser - Electricity - Bosnia and Herzegovina - 2020, accessed 13 February 2026.

[43] Državna regulatorna komisija za električnu energiju, Izvještaj o radu 2024, December 2024.

[44] Energy Regulatory Office of the Republic of Kosovo, Annual Report 2024, March 2025.

[45] Ioana Ciuta, Davor Pehchevski, Pippa Gallop, Comply or Close 2025 update.

[46] Ministry of Energy, Izvještaj o realizaciji energetskog bilansa za 2024. godinu, March 2025.

Montenegro's electricity network was connected with Italy's in November 2019,[47] and exports reached over 50 per cent of the country's entire generation in 2020. From then onwards, the trend only continued upwards, and in 2023, Montenegro exported more than it generated, having become a transit country.[48]

As shown above, Montenegro saw a drop in electricity exports to Italy in the first two months of 2026 compared to the previous few years. As with other countries in the region, it was unprepared.[49]

Nevertheless, Montenegro has belatedly made some progress towards a CBAM exemption for electricity in recent months, though it is still far from completing the process.

After a long delay, in December 2025 Montenegro's parliament finally adopted a new Climate law.[50] This made Montenegro the first in the region to legally commit to reaching carbon neutrality by 2050. It also laid the ground for an updated carbon pricing system.

Although Montenegro gained recognition for being the first country in the region to introduce carbon pricing, the system does not work well, among others because too many credits were issued for the now-defunct KAP aluminium plant.[51] Another issue is that until 2025, the Pljevlja coal power plant received some free allowances in proportion to the excise fees paid for coal and local fees paid to the municipality of Pljevlja.[52] Although the 2020 regulation on this issue did not foresee free allocations for Pljevlja beyond 2025, the new Climate law contains few details on changes in the emissions trading system, and in Article 45 still leaves open the possibility of providing free allowances for the plant.

In February 2026, Montenegro's parliament adopted the last pieces of the Electricity Market Integration Package, which now needs to be verified by the European Commission.[53]

North Macedonia

Despite being a net electricity importer and having seen a major decline in its coal generation since 2011, North Macedonia was expected to be heavily affected by CBAM in the electricity sector due to its relatively carbon-intensive electricity mix and its cross-border trading with Greece and Bulgaria.

[47] European Commission, Montenegro 2020 Report Accompanying the Communication from the Commission to the European Parliament, the Council, the European Economic and Social Committee and the Committee of the Regions, 6 October 2020.

[48] Eurostat, Imports of electricity and derived heat by partner country, NRG_TI_EH, accessed 17 February 2026.

[49] MINA, Eco-Team: Montenegro unprepared for CBAM, 11 January 2026.

[50] Zakon o klimatskim promjenama, Službeni list Crne Gore, br. 149/2025, 17 December 2025.

[51] CEE Bankwatch Network, The cautionary tale of Montenegro's emission trading scheme, 6 June 2022.

[52] Government of Montenegro, Uredba o aktivnostima odnosno djelatnostima koje emituju gasove sa efektom staklene bašte za koje se izdaje dozvola za emisiju gasova sa efektom staklene bašte, Službeni list Crne Gore, br. 8/2020, 14 February 2020.

[53] Energy Community Secretariat, Montenegro sets course for EU electricity market coupling with newly adopted legal framework, 20 February 2026.

In 2024, coal still had the highest share in domestic electricity production with 38 per cent, and gas cogeneration plants had 21 per cent. Hydropower plants made up 23 per cent, but wind power only 3 per cent. Solar's share was the highest in the region, at almost 14 per cent.[54]

North Macedonia's exports to Greece declined even before CBAM, as mentioned above. But in January and February this year, they dropped to zero. Surprisingly, its exports to Bulgaria were slightly higher than in previous years, for reasons which are not yet clear.

Although North Macedonia's draft National Energy and Climate Plan was published for consultations at the end of 2025, it did not contain a clear coal phase-out date. We are also not aware of any other significant steps towards gaining an exemption since October 2025.

Serbia

Serbia's electricity exports were not expected to be among the most seriously affected by CBAM.[55] The country exported only about 8.4 per cent of the electricity it generated to the EU between 2014 and 2023.[56] Already in 2024 the country's energy minister said it was 'not an option' to introduce an emissions trading system with pricing at the same level as the EU's by 2030 in order to gain a CBAM exemption under Article 2.7.[57]

Still, Serbia's electricity mix is carbon-intensive, with coal making up 60 per cent of electricity generated in 2024 – including the Morava and Kolubara plants running illegally[58] – and gas a further five per cent. The remainder was made up of nearly 30 per cent hydropower, four per cent wind power, 0.9 per cent biofuels and only 0.25 per cent solar.[59]

As the data above shows, once CBAM's definitive regime kicked in, electricity exports to Romania and Bulgaria saw a clear – although not unprecedented – drop, but exports to Croatia less so. Exports to Hungary did not drop, though. The results of CBAM therefore remain to be clearly established.

Serbia's government had already transposed the Electricity Integration Package before the 2025 CBAM Readiness Tracker was published, which is in the process of being verified by the Commission.[60] Since then,

[54] International Energy Agency, Energy Statistics Data Browser - North Macedonia - Electricity - 2023, accessed 17 February 2026; ERC, Annual Report 2024, April 2025.

[55] Ioana Ciuta and Pippa Gallop, A perfect storm - The Western Balkans power section in the time of CBAM.

[56] Eurostat, Imports of electricity and derived heat by partner country, NRG_TI_EH, accessed 18 February 2026.

[57] Igor Todorović, Serbia proposes national CO2 pricing system instead of regional ETS, Balkan Green Energy News, 4 July 2024.

[58] Ioana Ciuta, Davor Pehchevski, Pippa Gallop, Comply or Close 2025 update.

[59] Republic of Serbia Energy Agency (AERS), ИЗВЕШТАЈ О РАДУ АГЕНЦИЈЕ ЗА ЕНЕРГЕТИКУ ЗА 2024. ГОДИНУ, 2025.

[60] Energy Community Secretariat, Montenegro sets course for EU electricity market coupling with newly adopted legal framework, 20 February 2026.

the only update has been the sudden introduction of a carbon tax[61] and Serbia's own reverse version of CBAM,[62] with the draft legislation published just over two months before CBAM entered its definitive regime, allowing very little time for public debate.[63]

The 'reverse' CBAM law does not apply to the electricity sector. But the carbon price law would be big news if it were not for the fact that it has been set at only four euros per tonne and the legislation is full of loopholes.

Article 4 gives electricity generation companies – mainly Elektroprivreda Srbije (EPS) and Naftna Industrija Srbije (NIS), as the country's most carbon-intensive ones – the right to a tax credit of 20 per cent of the amount of financial resources invested in measures and activities leading to the reduction of carbon dioxide emissions during the tax period. This can amount to up to 80 per cent of the tax owed, representing a massive discount.

In addition, the law does not make clear that the money invested must have been the companies' own money – and not for example the EUR 31 million grant that the EU has given EPS for the Kostolac wind farm.[64]

Article 7 allows the affected companies to access subsidies from the national budget for investments in decarbonisation technologies, energy efficiency and various other things, without clearly stipulating any relation between the carbon tax and these incentives – in theory meaning that they can get more money in subsidies from the budget than they pay into it.

In general, the law fails to define a mechanism for ensuring that income from the tax is used for decarbonisation projects.[65]

In line with previous statements by Serbia's energy minister, this tax is clearly not aimed at contributing to an Article 2.7 exemption, but rather reducing CBAM charges under Article 9.

However, even this is not realistic. Article 9.1 states that where embedded emissions are determined on the basis of actual emissions, '...*The reduction may be claimed only if the carbon price has been effectively paid in a third country. In such a case, any rebate or other form of compensation available in that country that would have resulted in a reduction of that carbon price shall be taken into account.*' And where the embedded emissions are determined on the basis of default factors, *'In such a case, any rebate or other form of compensation available in that country that would have resulted in a reduction of that default carbon price shall be taken into account.'*

[61] Zakon o porezu na emisije gasova sa efektom staklene bašte, "Sl. glasnik RS", br. 109/2025, 4 December 2025.

[62] Zakon o porezu na uvoz ugljenično intenzivnih proizvoda, "Sl. glasnik RS", br. 109/2025, 4 December 2025.

[63] Belgrade Open School, Surprise for the economy and the public in Serbia: Introduction of a GHG emissions tax, 21 October 2025.

[64] Western Balkans Investment Framework, Kostolac Wind Farm, accessed 18 February 2026.

[65] Belgrade Open School, Surprise for the economy and the public in Serbia: Introduction of a GHG emissions tax, 21 October 2025.

With so many loopholes, Serbia's new tax can hardly be said to represent an 'effectively paid' carbon price. At best it could be considered a practice run in advance of the introduction of a more effective system, but it may just turn out to be a hidden subsidy system for EPS and NIS.

In addition, the law was not adopted based on the approved NECP; rather, the Ministry of Finance prepared a separate analysis, which is not publicly available, that defined how the tax rate was determined.[66] The NECP foresees that the price of emitted CO_2 will be relatively low, at EUR 4 per tonne of emissions from 2027 to 2029, before rising to EUR 40 per tonne in 2030, which corresponds to around half the current price of EU ETS emission allowances. Since the law does not stipulate any increase in the tax rate, it is unclear whether and how it will increase in the coming years, and when it will approach the EU ETS price.

Summary of country progress on Article 2.7 criteria

The table below summarises the countries' progress under the Article 2.7 criteria. It is based on the Energy Community Secretariat's October 2025 CBAM readiness assessment, adjusted to take account of updates since then.

Table 1. Summary of Western Balkan countries' progress on CBAM exemption criteria[67]

CBAM exemption criterion	ALB	BiH	KOS	MNE	MKD	SRB
Market coupling						
Agreement on applying EU law on energy, electricity, environment and competition						
Transposition of Electricity Integration Package, including verification by the European Commission						
Transposition of renewable energy legislation						
Submission of roadmap on carbon neutrality, EU acquis and emissions trading						
2050 climate neutrality commitment in national legislation						
2050 climate neutrality objective in long-term strategy						
Substantial progress in aligning with EU climate acquis, including an emissions trading system with price equivalent to the EU ETS by 2030						
Effective system to prevent indirect import from countries not meeting CBAM exemption criteria for electricity						

Condition fulfilled	Condition not fulfilled	Progress visible

[66] Ministarstvo Finansija Republike Srbije, Izveštaj o sprovedenoj javnoj raspravi o Zakonu o porezu na GHG emisije, accessed 2 March 2026.

[67] Adapted and updated from Energy Community Secretariat, Energy Community CBAM readiness tracker 2025.

The EU ETS must be upheld and improved

To add to the uncertainty regarding CBAM in recent months, some EU industry actors and governments have called on the Commission to suspend the EU ETS until it is revised later this year. Notably, in February it was reported that Italy's Prime Minister had called for suspension until the ETS is revised, with Austrian, Polish and Czech leaders also calling for weakening, while France and Sweden have underlined the need to uphold the policy.[68,69]

Where the power sector is concerned, the attacks on ETS largely reflect misguided investment policies – mainly in gas power plants. ETS has long incentivised a coal phase-out, but with rising prices, it is also making gas power plants very expensive to operate. Rather than showing flaws in the ETS, this shows it is working well.

Suspending one of the EU's most successful policies would run totally contrary to the need for regulatory and economic predictability for ETS installations, as well as undermine climate action. It would also send extremely confusing signals to the EU accession countries at a time when they need clear, long-term messages.

Conclusions

After the first two months of CBAM's definitive regime, electricity exports from the Western Balkans to the EU have fallen in some, but not all, cases, so it is too early to say what the full impacts are.

Nevertheless, CBAM is still evolving in order to clarify some remaining issues, and to respond to a range of criticisms and comments by various stakeholders. Many of these contain valid points, but in our opinion look only at the potential negative impacts on renewable energy investors and market integration, without acknowledging the role that decreased income for Western Balkan coal plant operators could have in driving forward decarbonisation, as well as other co-benefits like cleaner air and water. It is true that this has social consequences for coal-dependent communities, but these can be mitigated if well planned in a participatory, bottom-up process.

CBAM electricity critics also tend to see renewable energy investments as an inherent good whose exports should be privileged. Our experience, on the other hand, shows that although the overall share of solar and

[68] Ben Munster, Zia Weise and Elena Giordano, Italy calls for suspension of carbon price in major attack on EU climate policy, Politico, 26 February 2026.

[69] Zia Weise, The week the EU's climate foundations started to shake, Politico, 16 February 2026.

wind needs to grow immensely in the coming years, individual projects and investors can be positive or negative in terms of environmental impacts, public participation and corruption.

Moreover, solar and wind development in the Western Balkans must primarily be aimed at meeting domestic renewable energy targets rather than being exported. As well as having very poor environmental governance, the countries are relatively small and are (still) biodiversity hotspots, so they cannot afford to have their best sites taken for export-driven projects.

For these reasons, although some aspects of CBAM could have been prepared in a more timely manner, we welcome the fact that the EU did not postpone the start of the CBAM definitive regime and we underline that electricity must remain in CBAM.

Unlike for EU accession and the Energy Community Treaty, where there are few consequences for procrastination, the start of CBAM is the first time when the Western Balkan governments are likely to see real consequences from not taking action on time. The exemption criteria in Article 2.7 are therefore a real opportunity to drive progress on decarbonisation and carbon pricing, which must be seized. Introducing meaningful carbon pricing will need to be done in a phased way, but is a key means for the Western Balkans to mobilise domestic resources for energy transition and redevelopment of coal regions.

In light of recent challenges to the EU ETS by the Italian government and others, the EU also needs to send clear signals regarding carbon pricing in general. The ETS has in recent years developed into an effective instrument in the power sector, and this strength must be upheld.

Overall, while electricity market integration between the Western Balkan countries and the EU must continue, this should not be at any cost. It has to be done on the basis of real compliance with the EU environment and climate acquis. Not only will failure to do so further erode the EU's popularity in the region, it will also allow the continuation of an uneven playing field in which EU countries have to play by the law and Western Balkan ones do not.

Recommendations

In view of the above, we make the following recommendations to the European Commission:

- **Maintain and improve the ETS and keep electricity in CBAM.** In recent years, the ETS has started to be effective in the power sector; changing this now would be a huge mistake. The EU must stick to its commitments in order to advance climate action and ensure predictability.
- **Apply the exemptions under Article 2.7 of the CBAM Regulation strictly.** The proposed Memoranda of Understanding planned by the Commission with regard to Article 2.7 must be fully publicly available.
- **Avoid blanket exemptions for renewable electricity.** It is reasonable to make the criteria for calculating actual emissions more realistic for renewable energy companies to meet, but any blanket exemption for renewables from CBAM is unacceptable.
- **Do not count Serbia's carbon tax as a carbon price effectively paid** under Article 9 of the CBAM Regulation. With the tax credits and subsidies provisions as they are, companies paying the tax may end up getting more money back than they paid in the first place.
- **Do not count Montenegro's emission trading scheme as a carbon price effectively paid** until the climate law is updated to ensure that the Pljevlja coal power plant can no longer receive free allowances.
- **Ensure Western Balkan energy companies comply with EU environmental law.** A level playing field needs to be created by prioritising the transposition of the EU's nature and water directives in the Western Balkans, both as part of the EU accession process and via the Energy Community Treaty. The eligibility of Western Balkan energy companies to access EU funds in the electricity sector should also be explicitly linked to compliance with the Energy Community Treaty.
- **Earmark financial support for carbon-intensive regions** in the next EU long-term budget, to show the EU is serious about supporting a just transition in the Western Balkans. This support should be directly available to local authorities, in order to avoid lack of prioritisation at the national level.

Annex 1: Electricity import trends for EU countries neighbouring the Western Balkans, January and February 2023 to January and February 2026 (GWh)[70,71]

Electricity trading January

2023	ALB	BiH	MNE	MKD	SRB	
BG				39	231	270
GR	279			280		559
HR		215			216	431
HU					535	535
IT			356			356
RO					211	211
	279	215	356	319	1193	

2024	ALB	BiH	MNE	MKD	SRB	
BG				100	213	313
GR	177			228		405
HR		173			79	252
HU					437	437
IT			312			312
RO					202	202
	177	173	312	328	931	

2025	ALB	BiH	MNE	MKD	SRB	
BG				114	167	281
GR	80			86		166
HR		143			95	238
HU					374	374
IT			274			274
RO					253	253
	80	143	274	200	889	

2026	ALB	BiH	MNE	MKD	SRB	
BG				131	109	240
GR	178			1		179
HR		70			46	116
HU					422	422
IT			125			125
RO					144	144
	178	70	125	132	721	

[70] Energy-Charts.info, data from ENTSOE Transparency Platform.

[71] Figures for exports from Kosovo are not included since it has no direct border with the EU and we are not able to trace electricity transit figures.

Electricity trading – February

2023	ALB	BiH	MNE	MKD	SRB	
BG				48	108	156
GR	201			220		421
HR		217			221	438
HU					451	451
IT			290			290
RO					223	223
	201	217	290	268	1003	

2024	ALB	BiH	MNE	MKD	SRB	
BG				120	182	302
GR	178			264		442
HR		208			137	345
HU					432	432
IT			305			305
RO					120	120
	178	208	305	384	871	

2025	ALB	BiH	MNE	MKD	SRB	
BG				97	166	263
GR	49			31		80
HR		171			103	274
HU					431	431
IT			227			227
RO					269	269
	49	171	227	128	969	

2026	ALB	BiH	MNE	MKD	SRB	
BG				159	79	238
GR	272			0		272
HR		119			128	247
HU					523	523
IT			211			211
RO					184	184
	272	119	211	159	914	

Signed by

Aarhus center in BiH

Bosnia and Herzegovina

Active Mobility Albania

Albania

Association Dinarica

Bosnia and Herzegovina

Association for the Development and Affirmation of Society NODAS

Bosnia and Herzegovina

Association Makerspace Garage & Repair Cafe Mostar

Bosnia and Herzegovina

Association - Non Formal Education Network (UMNO)

Bosnia and Herzegovina

Balkan Green

Albania

Belgrade Open School

Serbia

Beyond Fossil Fuels

BIRN Kosovo

Kosovo

CEE Bankwatch Network

CEKOR Center for Ecology and Sustainable Development

Serbia

CELIM Shqiperi

Albania

Center for Climate Change

North Macedonia

Center for Energy Analysis – CEA

Serbia

Center for Environment

Bosnia and Herzegovina

Center of the Balkans

Serbia

CNVP Albania

Albania

Connector

Serbia

Co-PLAN

Albania

Critical Education Centre

Serbia

Democratic Dialogue Network

Serbia

Eco-team

Montenegro

EcoZ

Kosovo

Eko forum Zenica

Bosnia and Herzegovina

Eko svest Skopje

North Macedonia

ENECA

Serbia

Energy cooperative Elektropionir

Serbia

Energy cooperative Suncani krovovi

Serbia

Environmental center for Development Education and Networking (EDEN)

Albania

Environment Improvement Centre

Serbia

European Environmental Bureau

European Policy Centre (CEP)

Serbia

FLOROZON Center for Environmental Democracy

North Macedonia

Group of Rural Activists of Dibra-GARD

Albania

Healthy and Green

Serbia

Inicijativa ekološke edukacije – IEE

Serbia

InoYouth

North Macedonia

Inženjeri zaštite životne sredine

Serbia

Kosova Chamber of Commerce

Kosovo

New way

Serbia

NGO Green Home

Montenegro

NGO SEED

Montenegro

Platform for Social Development and Innovation (CORE)

Serbia

Protection and Preservation of Natural Environment in Albania (PPNEA)

Albania

Qendra “Durrësi Aktiv

Albania

Regional Academy for Democratic Development

Serbia/Regional

Regional Action Lab (Re-ACT Lab)

Renewables and Environmental Regulatory Institute

Serbia

RESET HUB

North Macedonia

Resource Environmental Center Albania

Albania

Resources in Development

Albania

RESU- Reinforce Sustainability

Albania

Team 42

Serbia

Trees for Albania

Albania

Udruženje Lilit

Serbia

UNECOOP

Serbia

Vojvodina Environmental Movement

Serbia

Youth and adult education association – YAEDA

Serbia

Youth Cultural Center – Bitola

North Macedonia

Youth Forum Bitola

North Macedonia

Youth network – MANIFEST

Serbia

Zelena Tranzicija

Serbia