



# Environmental Corruption Prevention in Northern Kosovo

*Antidote to the Architecture of Impunity*





**Environmental Corruption Prevention in Kosovo  
North**

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***September 2026***

**ABSTRACT**

Northern Kosovo (encompassing the municipalities of North Mitrovica, Zvecan, Zubin Potok, and Leposavic) presents distinct environmental governance challenges due to a complex socio-political environment, historical administrative gaps, and institutional friction.

This paper presents assessment of environmental protection frameworks, and presents recommendations for the regional cooperation toward effective local environmental governance.

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## EXECUTIVE SUMMARY

This policy proposal paper addresses the risk of environmental corruption in the four northern municipalities of Kosovo: North Mitrovica, Zvečan, Leposavić and Zubin Potok. Environmental corruption the abuse of entrusted power in the formulation, licensing, inspection, procurement and enforcement of environmental rules for private gain is a governance risk of particular severity in Kosovo North because of the contested legitimacy of public authority, weak inter-institutional data exchange, and fragmented oversight between central and municipal levels.

The paper provides:

- a) a problem analysis and risk mapping of environmental corruption in the four municipalities through the desk research work and survey analysis;
- b) state of environment analysis in Kosovo north and challenge context
- c) a full legislative inventory setting out the authority and jurisdiction of local institutions over environmental matters, grounded in the Constitution of the Republic of Kosovo, the Law on Local Self-Government (Law No. 03/L-040), the Law on Waste (Law No. 04/L-060), the Law on Environmental Impact Assessment (Law No. 03/L-214) and related legislation;
- d) a list of central institutions and their jurisdiction in Kosovo North, including the Ministry of Environment, Spatial Planning and Infrastructure (MESPI), the Kosovo Environmental Protection Agency (KEPA), the Inspectorate of Environment, Water, Nature, Spatial Planning and Construction (Law No. 04/L-175), the Agency for the Prevention of Corruption, the Office of the Auditor General, the National Audit Office, and law enforcement bodies; and
- e) a policy proposition and institutional design for the regional platform, with governance arrangements, preventive mechanisms, an implementation roadmap and measurable indicators.

This policy paper was developed as part of a project implemented by the Advocacy Center for Democratic Culture (ACDC). The views and conclusions expressed in this publication are solely those of the author and do not necessarily reflect the views of BIRN Kosovo.

## ACRONYMS AND ABBREVIATIONS

| <b>Acronym</b>   | <b>Meaning</b>                                                                          |
|------------------|-----------------------------------------------------------------------------------------|
| <b>APC / ACA</b> | Kosovo Anti-Corruption Agency, now the Agency for the Prevention of Corruption          |
| <b>CSO</b>       | Civil society organization                                                              |
| <b>EIA</b>       | Environmental Impact Assessment                                                         |
| <b>EU</b>        | European Union                                                                          |
| <b>EULEX</b>     | European Union Rule of Law Mission in Kosovo                                            |
| <b>IPA</b>       | Instrument for Pre-accession Assistance                                                 |
| <b>IPPC</b>      | Integrated Pollution Prevention and Control (Law No. 03/L-043)                          |
| <b>KAA</b>       | Kosovo Anti-Corruption Agency (predecessor of APC)                                      |
| <b>KEPA</b>      | Kosovo Environmental Protection Agency                                                  |
| <b>MAP LD</b>    | Ministry of Local Government Administration (MAPLD)                                     |
| <b>MAPL</b>      | Ministry of Public Administration and Local Self-Government                             |
| <b>MESPI</b>     | Ministry of Environment, Spatial Planning and Infrastructure (formerly MESP)            |
| <b>MOU</b>       | Memorandum of Understanding                                                             |
| <b>NGO</b>       | Non-governmental organization                                                           |
| <b>OAG</b>       | Office of the Auditor General (NACO - National Audit Office)                            |
| <b>PPP</b>       | Public-Private Partnership                                                              |
| <b>RMCEI</b>     | Recommendation 2001/331/EC providing for minimum criteria for environmental inspections |
| <b>SAA</b>       | Stabilization and Association Agreement between the EU and Kosovo                       |
| <b>SEA</b>       | Strategic Environmental Assessment (Law No. 03/L-230)                                   |
| <b>UNMIK</b>     | United Nations Interim Administration Mission in Kosovo                                 |
| <b>UNODC</b>     | United Nations Office on Drugs and Crime                                                |

## INTRODUCTION

### PURPOSE AND SCOPE OF THIS PAPER

This paper represents the summary of the research work on local self-governments efficiency improvement with the main focus on environmental crime/corruption in Kosovo north municipalities. It is produced to be used by the local institutions of these municipalities, municipal assemblies, mayors and municipal administrations, including municipal inspectorates in building the “better tomorrow” and sustainable future for the inhabitants of four municipalities in Kosovo north. Paper is also focused on addressing the problems and expand the cooperation with the municipalities interlocutors within Kosovo central institutions especially those whose jurisdiction extends to the territory of the four municipalities.

The paper pursues following objectives:

- i. to define and map the problem of environmental corruption as it manifests in Kosovo North;
  - ii. to compile a legislative inventory that explains, law by law, the authority and jurisdiction of local institutions over environmental matters;
  - iii. to compile a list of central institutions and their jurisdiction in Kosovo North; and
  - iv. to propose the design, mechanisms and roadmap of a joint regional platform through which the four municipalities prevent, detect and report environmental corruption in a coordinated manner.
- All legal and factual claims are referenced to cited sources.

### CONCEPTUAL DEFINITION - ENVIRONMENTAL CRIME

Environmental crime in Kosovo is not only a legal violation but is a systemic threat to the public health, biodiversity, and the long-term stability of the region. Many authoritative bodies describe environmental crime as breaches of environmental laws or conventions. A more conceptual definition regarding environmental crime generally includes but is not limited to illegal acts that harm the environment and may even involve organized or transnational criminal activity.

In legal and environmental policy discourse, environmental crime (or green crime) refers to any unlawful act or omission that breaches environmental statutory standards and causes or creates an imminent risk of causing severe damage to natural ecosystems, human health, biodiversity, or public natural resources (Bytyqi & Morina, 2022).

Unlike minor administrative infractions (such as late filing of an environmental audit report), an environmental crime meets a threshold of gravity codified under criminal law. These acts include:

- **Pollution offenses:** Intentional or grossly negligent discharge of toxic chemicals, heavy metals, or untreated effluents into air, soil, or water systems.
- **Illicit resource extraction:** Unauthorized commercial deforestation, riverbed sand and gravel dredging, or illicit mineral mining.
- **Waste offenses:** Illegal transport, management, dumping, or cross-border trafficking of municipal, hazardous, or industrial waste.

- **Eco-biodiversity offenses:** Wildlife trafficking, illegal hunting, habitat destruction in protected zones, or introducing invasive species.

#### CONCEPTUAL DEFINITION - ENVIRONMENTAL CORRUPTION

Environmental corruption is defined as the abuse of public power, discretionary regulatory authority, or institutional trust for private, corporate, or political gain, resulting in the non-enforcement, circumvention, or distortion of environmental laws and conservation policies.

While environmental crime represents the physical act of ecological destruction, environmental corruption acts as the enabling mechanism that allows green crimes to occur without detection or penalty. Environmental corruption operates at two primary levels:

Grand Environmental corruption: High-level political decisions involving state capture, such as issuing illegal mining concessions, bypassing mandatory Environmental Impact Assessments (EIAs) for infrastructure projects, or retroactively altering zoning protections for commercial interests.

Petty/Administrative corruption: On-the-ground transactions where operators bribe field-level inspectors, forest rangers, or border police to ignore illegal timber transport, unpermitted aggregate extraction, or illicit waste dumping.

#### THE KOSOVO NORTH CONTEXT

Kosovo North is the area north of the river Ibar in the divided city of Mitrovica and its surrounding region. Until 2013, the area operated outside Kosovo's government structures through Serbia-backed parallel institutions, which were abolished by the 2013 Brussels Agreement between the governments of Kosovo and Serbia. The Agreement also foresaw the establishment of a Community/Association of Serb-majority municipalities, whose implementation has been continuously contested and remains unresolved. Research on the post-2013 period documents that certain parallel administrative practices persisted even after municipal integration, including continuing Serbian financial support and instances of local officials receiving double salaries from Pristina and Belgrade (CBAP, 2019). In January 2025, the Government of Kosovo announced the closure of a further 28 parallel offices across ten municipalities; the move was condemned by the EU as contrary to the normalization process, illustrating how politically sensitive the governance environment remains in and around the northern municipalities (Jurist, 2025).

These four municipalities are part of the asymmetric decentralization model designed under the Ahtisaari Plan. The Law on Local Self-Government (Law No. 03/L-040) grants municipalities with a Serb majority a set of enhanced competences, and North Mitrovica holds the unique enhanced competences in higher education and secondary health care (Council of Europe, 2021; Rrahmani, 2025). The same law, together with the Constitution of the Republic of Kosovo (Articles 123–124), guarantees municipalities own, delegated and enhanced competences, inter-municipal cooperation and the right to decide, collect and spend municipal revenues, while administrative review of municipal acts is limited to ensuring compatibility with the Constitution and the law (Council of Europe, 2021; Rrahmani, 2025).

The environmental governance relevance of this context is direct: environmental protection is listed as an own competence of every municipality under Article 17 of the Law on Local Self-Government (local environmental protection), and municipal environmental inspection is a core local function (Council of Europe, 2021; IMPEL, 2015). Where public authority has historically been contested, where cadastral and business-registration data have been fragmented between systems, and where inspection and permitting have been exercised with limited coordination, the space for corrupt practices in environmental decision-making, licenses, waste concessions, construction permits, forestry permits, public procurement of environmental services expands correspondingly.

#### ENVIRONMENTAL GOVERNANCE AND CORRUPTION RISK IN KOSOVO

Kosovo has built a comparatively comprehensive environmental legal framework in approximation of the EU *acquis*, driven by its Stabilization and Association Agreement obligations. The cornerstone is the Law on Environmental Protection (Law No. 03/L-025, approved 26 February 2009), which establishes principles including sustainable development, prevention and precaution, polluter pays, and gradual harmonization with EU standards (Kosovo Environmental Protection Agency [KEPA], n.d.; Ministry of Environment, Spatial Planning and Infrastructure [MESPI], 2023). Sectoral laws adopted between 2009 and 2014 include the Law on Integrated Prevention and Control of Pollution (03/L-043), the Law on Environmental Impact Assessment (03/L-214), the Law on Strategic Environmental Assessment (03/L-230), the Law on Air Pollution against Pollution (03/L-160), the Law on Nature Protection (03/L-233), the Law on Waters (04/L-147), the Law on Waste (04/L-060) and the Law on Spatial Planning (04/L-174) (Helvetas/Demos, n.d.; KEPA, n.d.; Republic of Kosovo, 2010). EU assessments consistently find that legislative approximation is near-complete in several sectors while implementation, inspection and enforcement remain the weak link (IMPEL, 2015; Republic of Kosovo, 2010).

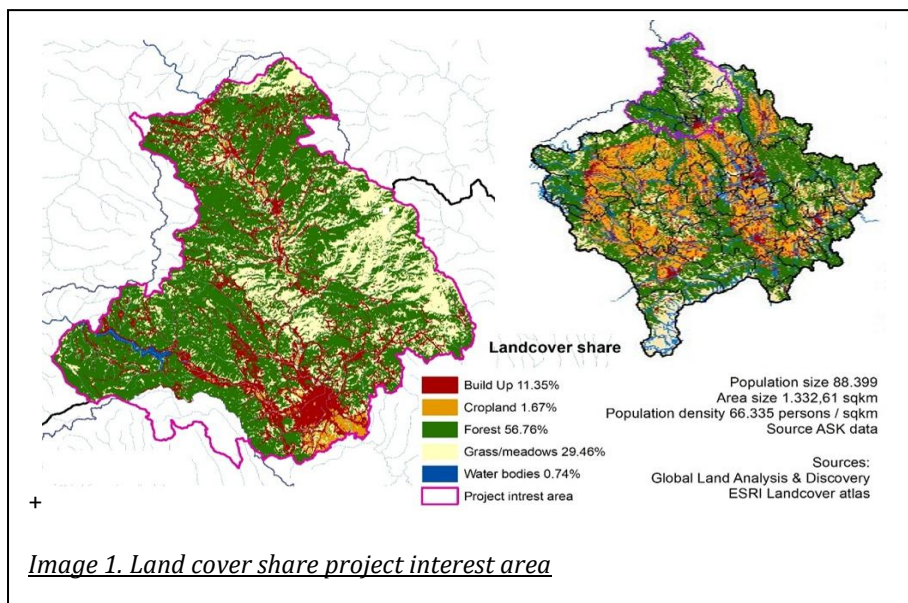
Corruption risk in Kosovo's public sector is documented as widespread by independent and intergovernmental sources. The OECD's Anti-Corruption and Integrity Outlook 2026 reports that Kosovo fulfils 47% of criteria on the strength of its strategic framework and 73% on practice, but only 20% on regulations for lobbying oversight, which remains unregulated with no cooling-off regime for lobbyists (OECD, 2026). Civil society monitoring under the UNCAC framework finds that adoption of anti-corruption laws has outpaced implementation, that no senior official has been punished for corruption in recent years, and that integrity plans, anti-corruption proofing of legislation and corruption risk assessments remain weakly implemented (UNCAC Coalition & Kosovo Law Institute, 2024). The sectors most exposed to corruption include public procurement, customs, public utilities and the judiciary (GAN Integrity, n.d.). Environmental governance intersects all of these: waste management concessions and service contracts are procured publicly; environmental permits and EIA consents are discretionary administrative decisions; quarrying, construction and forestry are licensed locally; and inspection outcomes can be influenced. This intersection of environmental discretion plus high-corruption-risk instruments is the specific policy problem addressed here.

## PROBLEM STATEMENT - KOSOVO CONTEXT

Kosovo's historical richness and abundance of the quality environmental resources stretch in full continuum from neolithic era to the date and it is a direct consequence of exceptional environmental resource availability.

In the last century industrial revolution with the demographic shift developed different trends that placed unrecorded pressure to the water systems in Kosovo. Once potent and abundant water network become the scarce and inefficient to cater the growing demand by the thirsty practices and large population density.

## RISK MAP FOR THE FOUR MUNICIPALITIES



Based on the distribution of competences the principal environmental corruption risk nodes in North Mitrovica, Zvecan, Leposavic and Zubin Potok are:

- Waste management services. Under Article 15 of the Law on Waste, municipalities must establish the local waste management system, adopt local waste management plans, procure collection and transport services through public procurement, and set and collect waste fees (Helvetas/Demos, n.d.). Procurement of waste contracts, fee-setting, and supervision of operators are all high-value discretion points. Municipalities have in the past paid waste operators from capital investment budgets in the absence of sufficient service-category funding, a practice the Auditor General has formally remarked upon (Helvetas/Demos, n.d.).

- Municipal environmental permits. Activities falling under Annex II of the EIA Law that are screened out of the full EIA procedure require a municipal environmental permit, with municipal inspectors exercising regulatory supervision (IMPEL, 2015). The permitting of small industrial, commercial and construction activities is therefore a fully local discretion and a classic corruption entry point.
- Construction and spatial planning. Implementation of building regulations and building control standards, land use and development planning, and urban and rural planning are municipal own competences (Council of Europe, 2021; IMPEL, 2015). Densification, informal construction, and changes of land use along the Ibar valley and around mining and industrial sites create rent-seeking opportunities in permit issuance and inspection tolerance.
- Forestry and natural resources. Forestry protection including licensing of tree felling under rules adopted by the Government is a delegated competence exercised by municipalities on the central level's behalf (Council of Europe, 2021; Rrahmani, 2025). Illegal logging in the mountainous territory of Leposavic and Zubin Potok has historically been linked to weak cross-municipal coordination of felling permits and inspection.
- Water and riverbed resources. Municipalities rely on regional water companies for supply, with annual agreements between municipalities and the companies (Rrahmani, 2025). The interface between municipal fee-setting, regional company operations and KEPA water monitoring involves several actors and weak accountability chains.
- Public procurement and concessions generally. The Law on Public Procurement (04/L-042, as amended) and the PPP Law (04/L-045) apply to waste concessions and environmental works (Helvetas/Demos, n.d.); weaknesses in implementation and in the independence of review bodies have been repeatedly flagged (GAN Integrity, n.d.; UNCAC Coalition & Kosovo Law Institute, 2024).
- Parallel or unconsolidated structures. Documented legacy practices, Serbian funding channels, dual salary arrangements, and issuance of documents under non-Kosovo rules, create accountability gaps in which environmental fees and fines may not be recorded, collected or enforced through the Kosovo system (CBAP, 2019; Jurist, 2025).

## METHODOLOGY

The needs assessment activity and research protocol is designed under the project scope that included three policy research areas on three separated Anti-Corruption Policy Papers. This paper focuses on the 3<sup>rd</sup> paper with the focus area of Environmental protection in municipalities of North Mitrovica, Zubin Potok, Zvecan and Leposavic.

Learning curve developed in the Paper research I and II provided sufficient elements in the methodology design including the questionnaire, target group allocation, timeline and expected deliverables outputs volume.

The methodology of the analysis was carried out in several phases:

- Online survey design in two language target groups (Serbian and Albanian);

- Field work and in person questioning (Legislative landscape)
- Desk research investigating legislative landscape limitations and opportunities.
- Survey results analysis
- Research material analysis
- Producing the policy proposal recommendation

Methodology including type and research volume was conducted through August to the mid of September 2026.

#### SURVEY ANALYSIS

Project work package included analysis of the current environmental protection frameworks that was mostly covered under the desk research. However, considering radical shift of the environmental management mechanisms upon the dismantling the management ultrastructure that existed in the past in project area (Waste management, forest and land management, fishery and hunting rangers etc), it was logical that the survey would be a perfect tool to be used as control segment to identify gaps and ambiguities of the environmental protection challenges. Questionnaire and the timeline were designed upon the same methodology and in the same volume as in the preparation of the policy paper I and II analysis.

For the purpose of identifying the gaps in appropriate environmental management and enforcement of the local administration policies it is critical to have respectable representation of the ethnic groups, including the age and gender representation.

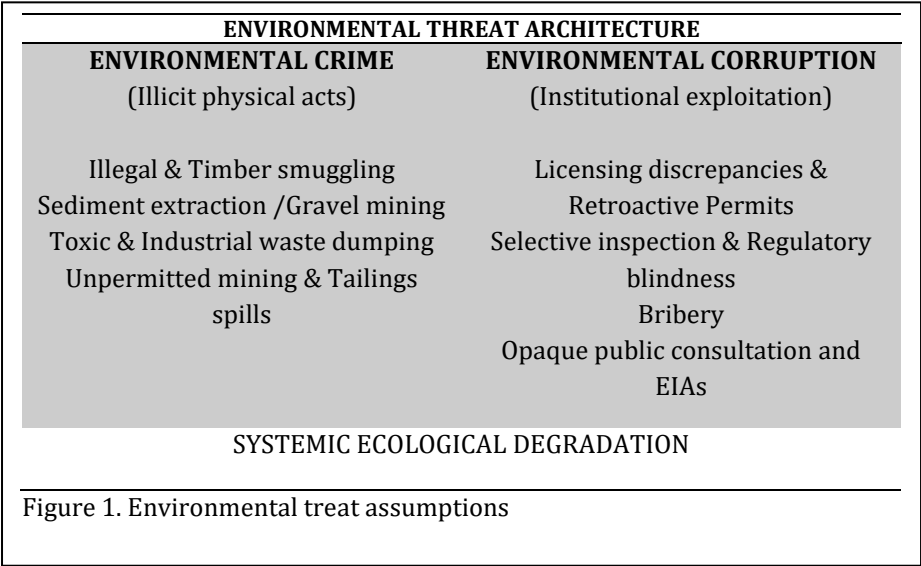
Survey data would be critical in development practical recommendations to strengthen local environmental governance.

#### DESK RESEARCH AND LEGAL ANALYSIS

This paper uses doctrinal legal analysis of the primary legislation in force in Kosovo, complemented by secondary sources: EU enlargement and project documentation (IPA project fiches, IMPEL review reports), OECD integrity assessments, Council of Europe studies on local self-government, World Bank environmental and social documentation, and civil society monitoring reports (Kosovo Law Institute, UNCAC parallel reporting, GAN Integrity country risk profiles). Legislation is cited with its official law number and Official Gazette reference where available. Where implementation practice is described, the source is a documented review or report rather than assertion.

Limitations: Kosovo's environmental legislation is under revision (a Concept Document for a new Law on Environment was prepared by MESPI in 2023, identifying significant implementation gaps and proposing a new framework law) (MESPI, 2023); users of this paper should verify the in-force version of each act on the Official Gazette portal ([gzk.rks-gov.net](http://gzk.rks-gov.net)) before relying on it in proceedings. Statistical data on corruption

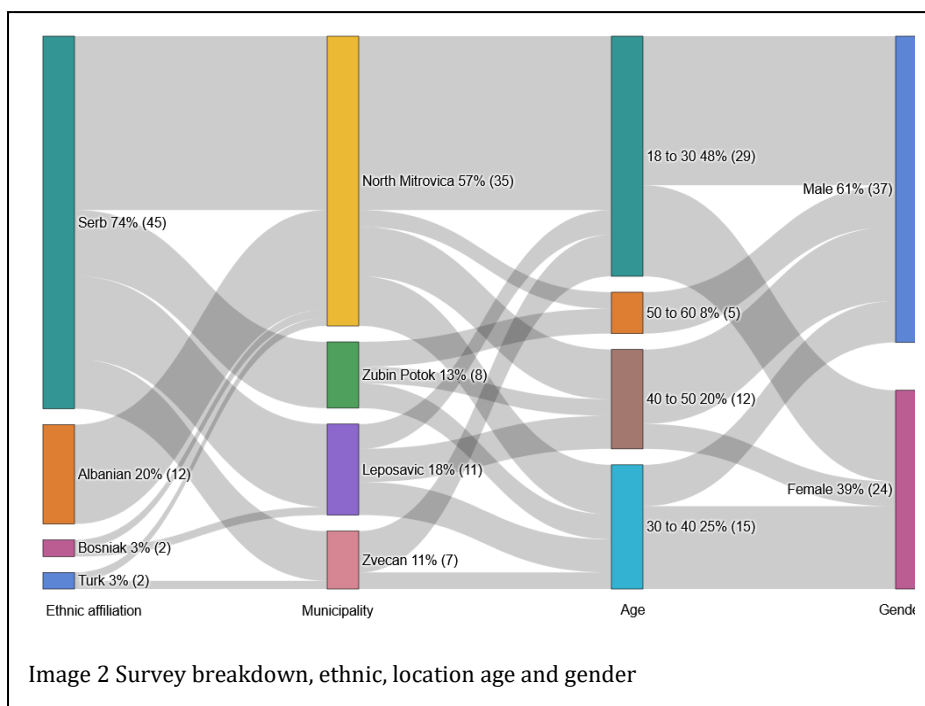
cases specific to environmental matters in the four municipalities is not systematically published; this paper therefore relies on qualitative risk mapping rather than case statistics.



## ONLINE SURVEY – KEY FINDINGS

The report analyzes citizen perceptions of environmental protection, environmental crime, and associated corruption across four municipalities in northern Kosovo: North Mitrovica, Leposavic, Zubin Potok, and Zvecan. Based on the survey of 61 residents, there is a prominent sense of dissatisfaction with the current environmental state, alongside high distrust in competent institutions.

Nearly **69%** of respondents have noticed environmental threats in the past 12 months, identifying inadequate waste management and water pollution as paramount concerns. Perceptions of corruption within environmental governance are high, particularly concerning waste management, urban planning, and the issuance of permits. Notably, while over half of respondents (52%) express a willingness to report environmental corruption, a significant portion (46%) remains unsure, reflecting a chilling effect caused by an overwhelming lack of institutional trust (nearly 60% distrust institutions).



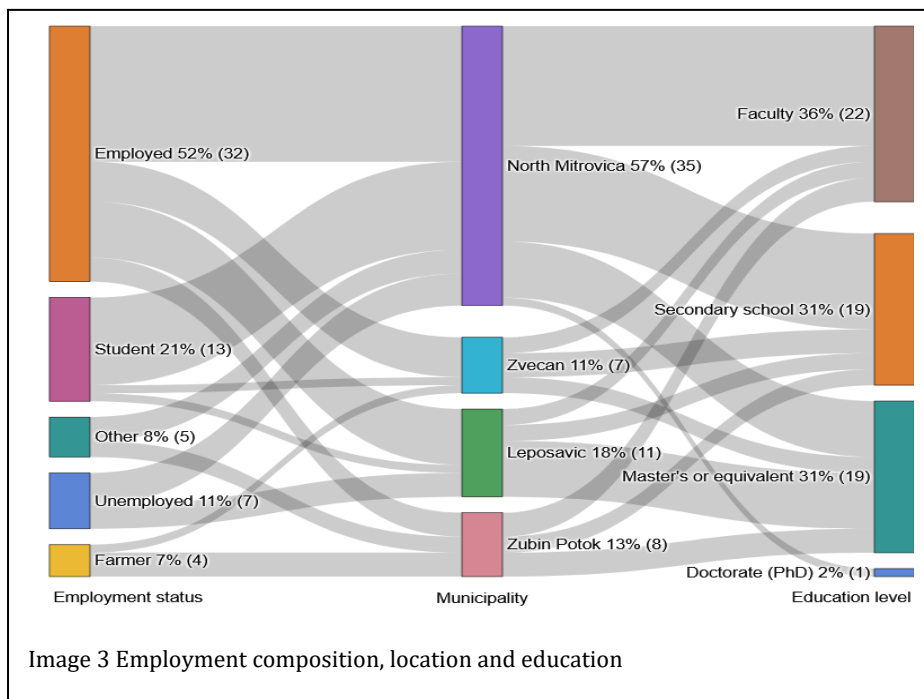
## INTRODUCTION & METHODOLOGY

The analysis is based on a structured dataset comprising 61 individual responses. The survey captured categorical and qualitative data focusing on:

1. **Demographic distributions** (Age, Gender, Ethnicity, Location).

2. **Environmental assessments** (Threats, elements at risk, specific pollution problems).
3. **Institutional trust and corruption** (Experiences with irregularities, perceived corruption risks, willingness to report).

The data was cleaned and analyzed using SPSS platform for the visualizations to cross-reference demographic subsets with their respective environmental and institutional perceptions.



#### DEMOGRAPHIC PROFILE OF RESPONDENTS

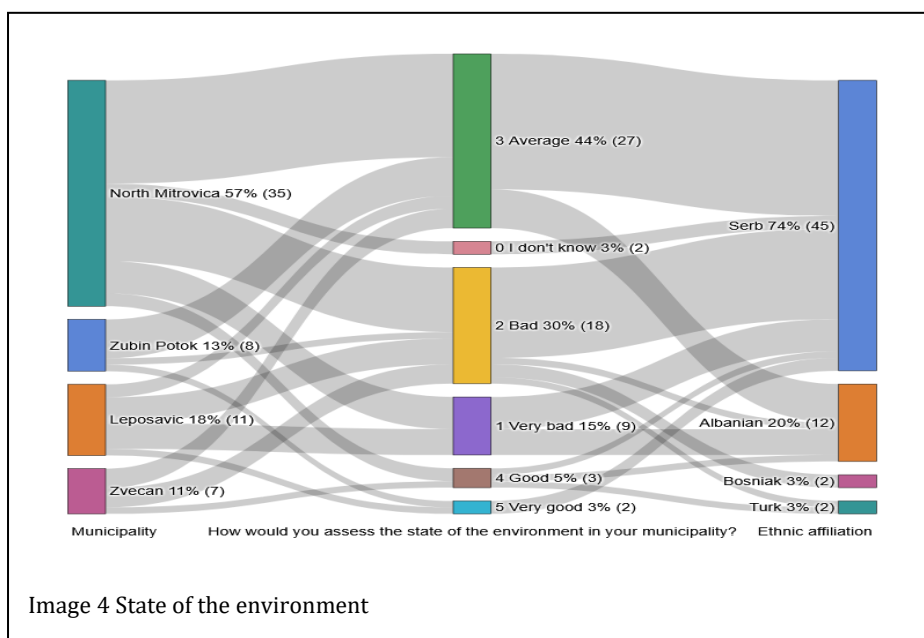
The survey captures a localized but diverse cross-section of northern Kosovo residents.

- **Location mapping:** The majority of respondents reside in **North Mitrovica (57.4%)**, followed by Leposavic (18%), Zubin Potok (13.1%), and Zvecan (11.5%).
- **Age distribution:** The sample skews heavily toward younger demographics. The largest cohort is **18 to 30 years old (47.5%)**, followed by 30 to 40 years old (24.6%). The survey sample is focused to primarily reflect the views of working-age adults in Kosovo north.

- **Gender:** The gender distribution leans male, with 37 male respondents (60.6%) but with respectfully credible rate of female respondents (39.4%).
- **Ethnic affiliation:** The predominant ethnic group represented is **Serb (73.7%)**, alongside significant sample size of Albanian in much higher rate than in the population representation in Kosovo north (19.6%), and minority representation from Bosniak (3.2%) and Turk (3.2%) communities that are relatively in the same rate as in the population sample.

#### KEY FINDINGS: ENVIRONMENTAL PERCEPTION & THREATS

Citizens hold a bleak view of the environmental landscape in their municipalities, suggesting that environmental degradation is highly visible to the general public.



When asked to assess the current state of their environment, the overwhelming majority rated it as poor. The most frequent responses were "Average" (27 respondents), "Bad" (18 respondents), and "Very bad" (9 respondents). Only 5 individuals rated the environment positively.

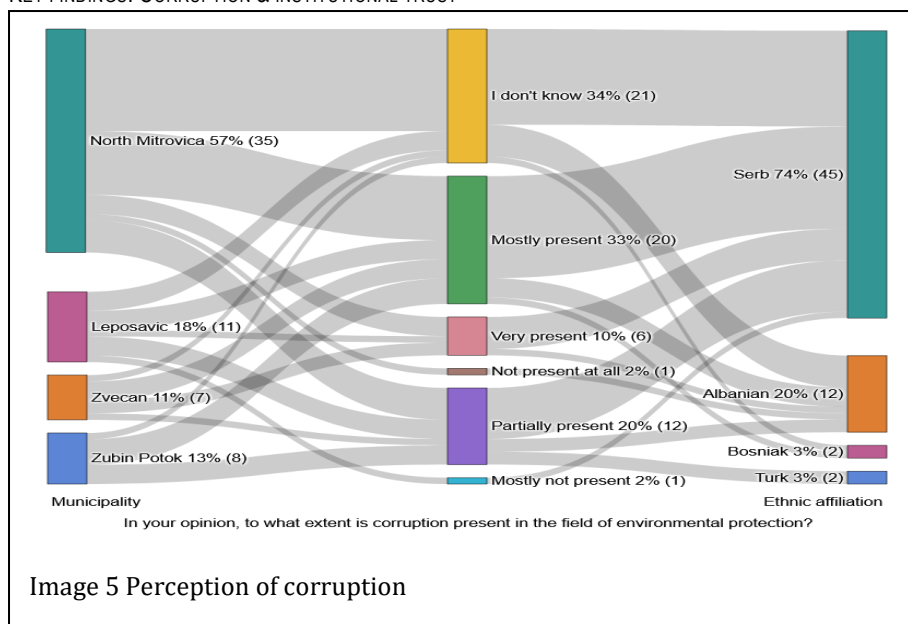
#### VISIBLE THREATS AND CORE PROBLEMS

- **Visibility of damage:** 68.8% of respondents explicitly noted a problem threatening the environment within the last 12 months. Only 8% definitively stated they had not seen any issues.

- **Primary concerns:** When isolating the single biggest environmental problem, waste dominates the discourse.
  - Inadequate waste management (19 respondents)
  - Illegal waste disposal (10 respondents)
  - Water pollution (10 respondents)

These findings suggest that environmental crimes in northern Kosovo are not hidden, sophisticated operations, but rather visible, systemic failures regarding fundamental sanitation and resource protection with (as it should be) clear responsible authority designation. The evidence from the ground shows elements of indolence and exploitation of the ambiguity toward attaining results designed by the central institutions in Kosovo (lack of due process, legal and administrative in environmental management, land designated use, business infrastructure development without consent of the local communities, etc.)

#### KEY FINDINGS: CORRUPTION & INSTITUTIONAL TRUST



The intersection of environmental degradation and governance in northern Kosovo is defined by a severe trust deficit. This finding is not a surprise, the evidence of the dysfunctional institutions and political turmoil that still produce unclear pathway toward the institutional stability in 2026 is the best evidence for this. In respect of the project area, radical shift of the governance landscape in local institutions and security forces

(police) with the dismantling so called "parallel structure" removed any elements of the service provided and managements mechanisms that produced safe and secure environment and optimal service to the citizens.

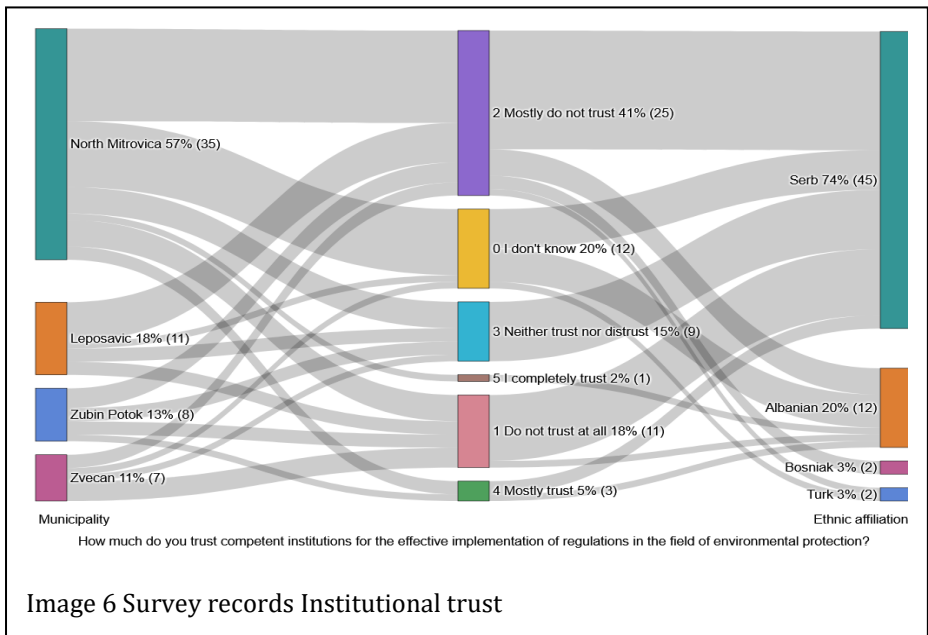
#### PERCEPTIONS OF CORRUPTION

Corruption is widely viewed as a driving force behind environmental issues. As illustrated in the chart below, a significant portion of respondents believe corruption is either "Mostly present" or "Partially present." Notably, the highest single response was "I don't know," suggesting either a lack of transparency that prevents citizens from understanding how decisions are made, or (caveat) a hesitation to formally accuse authorities of corruption.

#### HIGH-RISK ZONES FOR ABUSE

Respondents pinpointed specific sectors where environmental corruption is most likely to flourish (multiple answers data): **Waste management and disposal:** 24 citations, **Urban planning and construction:** 21 citations, **Misusing permits and approvals:** 20 citations, **Exploitation of natural resources & Inspections:** 17 citations each.

#### THE INSTITUTIONAL TRUST DEFICIT



The most alarming statistic from a policy perspective is the lack of faith in competent institutions.

- **59% of respondents** state they "Mostly do not trust" (41%) or "Do not trust at all" (18%) institutions to effectively implement environmental regulations.
- Conversely, less than **7%** of the population holds positive trust in these institutions.
- When asked if they would report environmental corruption if they discovered it, **52.4%** said Yes, but an almost equal number (**45.9%**) said "I am not sure," while only 1.6% definitively said No. This highlights a critical barrier: citizens want to help, but they are hesitant, likely due to fear of reprisal, apathy, or the belief that reporting will not lead to actionable results.

#### DRAWBACKS, LIMITATIONS, AND OUTLIERS IN THE DATA

While this data provides vital insights, several methodological limitations must be acknowledged before drafting policy:

- **Sample location isolation:** Project area is both producer of the effluents (industrial legacy, logging, urbanization) and as well affected area of environmental degradation from other regions (waterways are effluents conveyer belt from Pristina and Obilic), Sample size is missing the control sample that could define causality of the environmental degradation and with this information policy recommendation could be pinpointed on the pollution point source and at the designated authority. Control sample is also needed to pinpoint the environmental degradation produced in the survey sample area that could be neglected as irrelevant since the environmental and other costs is exported.
- **Sample size and geographic skew:** With only 61 total responses, the sample is relatively small. Furthermore, 57% of responses come from North Mitrovica alone. The data may underrepresent the rural realities of Leposavic, Zubin Potok, and Zvecan, where issues like illegal logging or mining might be more prevalent than urban waste issues.
- **Age representation (outlier bias):** There are **zero** respondents over the age of 60. Given that older generations often have historical context regarding industrial pollution (e.g., the Trepca mining legacy), their exclusion represents a gap in the data.
- **High "I don't know" rates:** The high frequency of "I don't know" responses regarding the presence of fear from the institution retaliation and/or corruption is an analytical drawback. It makes it difficult to ascertain if respondents are genuinely unaware, apathetic, or fearful of answering truthfully on a sensitive topic. More than often also show lack of information about the governance ecosystem responsibility in the aftermath of the radical shift dismantling the Serbian management system in spatial and environmental planning and economic development toward Kosovo Central institutions applied doctrines in Kosovo north.

#### POLICY RECOMMENDATIONS DERIVATIVES OF SURVEY ANALYSIS

To build a more informed, active, and protected citizenry in Kosovo North regarding environmental crime and corruption, the following policy interventions are recommended:

### **I. Establish secure, anonymous reporting mechanisms**

- **The problem:** 46% of citizens are "not sure" if they would report environmental crimes, heavily linked to the 59% institutional distrust rate.
- **The solution:** Local municipalities, potentially partnered with international NGOs (like OSCE or UNDP), must establish a third-party, encrypted, and fully anonymous digital reporting portal (Kosovo Police *Lajmero Policine* application have a strong digital footprint) for illegal dumping and suspicious construction permits.

### **II. Target "Waste Governance" as the primary anti-corruption vector**

- **The problem:** Waste management and illegal disposal were cited as both the biggest visible problems and the highest risk areas for corruption.
- **The solution:** Launch localized municipal audits specifically focused on waste management contracts. Policy should mandate public digital ledgers showing which companies hold waste disposal contracts, how much they are paid, and GPS tracking of their designated dumping zones.

### **III. Implement "Youth-to-community" environmental education**

- **The problem:** The survey demographic is heavily skewed toward youth (18–30), showing this demographic is engaged, yet they feel powerless against institutional failures.
- **The solution:** Utilize the engaged youth demographic by funding youth-led civic watchdog groups. These groups should be trained to read urban planning permits and environmental impact assessments, acting as localized watchdogs that simplify and broadcast this data to the older, less-informed public.

### **IV. Mandatory transparency in urban planning & permitting**

- **The problem:** Urban planning and the issuance of permits were ranked as primary zones for corruption. Citizens feel they have no influence over environmental decision-making.
- **The solution:** Institute a mandatory 30-day "Public Review and Comment" period for all new construction and resource exploitation permits. Ensure these permits are physically posted at the construction sites and municipal halls, alongside plain-language explanations of their environmental impact, removing the opacity that allows corruption to thrive.

## KOSOVO LEGISLATIVE LANDSCAPE/ARCHITECTURE ANALYSIS

## AUTHORITY AND JURISDICTION OF LOCAL INSTITUTIONS IN KOSOVO NORTH

This inventory lists the constitutional and legislative basis of the authority of the municipal institutions of North Mitrovica, Zvečan, Leposavić and Zubin Potok over environmental matters, and explains the content and jurisdictional reach of each act. It is organized in three layers: (A) constitutional foundations; (B) framework and sectoral laws conferring municipal powers; (C) integrity-related laws binding municipal institutions.

## CONSTITUTIONAL FOUNDATIONS

| <b>Instrument</b>                                                                        | <b>Key provisions</b>                                                                                                                                                                                                                                                                                                                                                   | <b>Authority and jurisdiction explained</b>                                                                                                                                                                                                                                                                                                                                                                                               |
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| <b>Constitution of the Republic of Kosovo (2008), Chapter X, Articles 123–124</b>        | Art. 123: local self-governance is based on good governance, transparency, efficiency and effectiveness. Art. 124: municipalities have own, extended and delegated competences; right to inter-municipal and cross-border cooperation; right to decide, collect and spend municipal revenues; administrative review limited to compatibility with Constitution and law. | Establishes the municipality as the basic unit of local self-government and the constitutional ceiling on central interference: central authorities may review municipal acts only for legality, not merit. This is the legal basis for the four municipalities to create a joint platform by mutual agreement, and it limits what central bodies may override locally in environmental matters (Council of Europe, 2021; Rahmani, 2025). |
| <b>Ahtisaari Comprehensive Proposal (2007), Annex IV and decentralization provisions</b> | Design of the decentralized system; enhanced municipal competencies for Serb-majority municipalities; protection of municipal autonomy in financial matters.                                                                                                                                                                                                            | Historical-constitutional basis of the asymmetric competences enjoyed by the four municipalities; explains why North Mitrovica holds unique enhanced competences (Council of Europe, 2021; Rahmani, 2025).                                                                                                                                                                                                                                |
| <b>European Charter of Local Self-Government principles</b>                              | Kosovo's local government legislation was drafted in the spirit of the Charter (Kosovo is not a CoE member/signatory).                                                                                                                                                                                                                                                  | Supplies interpretive standards (subsidiarity, full and exclusive exercise of powers) that inform the scope of municipal environmental jurisdiction (Council of Europe, 2021; IMPEL, 2015).                                                                                                                                                                                                                                               |

## FRAMEWORK AND SECTORAL LAWS CONFERRING MUNICIPAL POWERS

| <b>Law (number, year, OG)</b>                                         | <b>Municipal powers relevant to environment and anti-corruption</b>                                                                       | <b>Authority and jurisdiction explained</b>                                                                                         |
|-----------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------|
| <b>Law No. 03/L-040 on Local Self-Government (2008, OG June 2008)</b> | Art. 17 own competences (incl. 'local environmental protection', waste management among public utilities, water supply, sewers and sewage | The central catalogue of municipal authority. 'Local environmental protection' is an own competence exercised autonomously, subject |

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|                                                                                                | <p>treatment, local roads, land use and development, urban and rural planning, implementation of building regulations and building control standards, licensing of local services, local economic development, tourism); Art. 18 delegated competences (cadastral records, civil registries, business registration and licensing, forestry protection incl. felling licenses under Government rules); Arts. 19–23 enhanced competences (North Mitrovica: secondary health care and higher education; all Serb-majority municipalities: cultural affairs; participatory rights in selection of local police station commanders).</p> | <p>only to legality review. Municipal organs: Municipal Assembly (approves statute, regulations, budget, investment plans, annual work plan and report) and Mayor (leads administration, proposes regulations and budget, executes acts, conducts financial administration and reports every six months on the economic-financial situation). These organs are the addressees of this policy paper (Council of Europe, 2021; IMPEL, 2015; Rrahmani, 2025).</p> |
| <b>Law No. 03/L-041 on Administrative Boundaries (2008)</b>                                    | <p>Defines the territory of the municipalities, including the four northern municipalities established in 2013.</p>                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | <p>Fixes the territorial jurisdiction of each municipal institution; the platform covers exactly the aggregate of these four territories (Council of Europe, 2021; Republic of Kosovo, 2010).</p>                                                                                                                                                                                                                                                              |
| <b>Law No. 04/L-060 on Waste (2012, OG 17/2012)</b>                                            | <p>Art. 15: municipalities establish the waste management system per the waste hierarchy for their territory; adopt and implement local waste management plans; draft annual waste management reports to the Ministry; regulate, organize and perform waste services; procure collection, storage and transport of solid, municipal, bulky and construction/demolition waste from licensed persons; determine and collect waste service fees; maintain public information systems on waste.</p>                                                                                                                                     | <p>Makes municipalities the operational masters of municipal waste management the highest-value recurring environmental function at local level and the highest procurement exposure. Central level (MESPI/KEPA) sets policy, strategy, licensing of waste operators, import/export/transit permits, and hazardous waste responsibilities beyond municipal jurisdiction (Helvetas/Demos, n.d.).</p>                                                            |
| <b>Law No. 03/L-214 on Environmental Impact Assessment (2010, OG; promulgated DL-048-2010)</b> | <p>Annex II projects screened out of full EIA: the Municipality may initiate issuance of a Municipal Environmental Permit (Art. 12(4)); municipal inspectors exercise regulatory supervision of such permits; municipalities receive copies</p>                                                                                                                                                                                                                                                                                                                                                                                     | <p>Divides permitting jurisdiction by Annex I/Annex II: MESPI grants environmental consent for significant projects (never before EIA completion; no construction permit before consent); municipalities permit the lower tier. Fines for starting projects without</p>                                                                                                                                                                                        |

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|                                                                               | of EIA decisions for projects in their territory.                                                                                                                                           | consent range from EUR 10,000–50,000 for legal persons; false data in EIA procedures is sanctioned; public participation and judicial review (30 days) apply all of which are corruption-control features (IMPEL, 2015; Republic of Kosovo, 2010).                                                                                                                                        |
| <b>Law No. 03/L-230 on Strategic Environmental Assessment (2010)</b>          | Applies to plans and programs, including municipal spatial and waste management plans.                                                                                                      | Requires environmental assessment of the very municipal plans (zoning, waste plans) in which capture would be most profitable, creating a procedural barrier to corrupt plan-level decisions (KEPA, n.d.; Republic of Kosovo, 2010).                                                                                                                                                      |
| <b>Law No. 03/L-025 on Environmental Protection (2009, OG 50/2009)</b>        | Sets the general framework and principles (prevention, precaution, polluter pays, access to information); mandates environmental monitoring and public reporting; Art. 59 establishes KEPA. | Framework law binding on all public authorities including municipalities; its access-to-information and monitoring provisions are the legal basis for municipal environmental data publication; its incomplete secondary legislation (several AIs not adopted) is a documented implementation gap that increases discretionary space (KEPA, n.d.; MESPI, 2023; Republic of Kosovo, 2010). |
| <b>Law No. 03/L-043 on Integrated Prevention and Pollution Control (2009)</b> | Integrated (IPPC) licensing of installations with significant pollution potential; licenses issued centrally by MESP/MESPI; fines EUR 15,000–50,000 for operating without authorization.    | Confirms that permitting of significant industrial installations is central jurisdiction, municipalities are not competent here, but are enforcement partners and information sources; corruption risk in the north arises at the interface (false local data, tolerated unlicensed operation) (IMPEL, 2015; Republic of Kosovo, 2010).                                                   |
| <b>Law No. 04/L-147 on Waters (2013)</b>                                      | Water resources management; protection of water bodies; interface with municipal water supply and sewage competences.                                                                       | Central-level jurisdiction over water as a resource; municipal jurisdiction over local supply/sanitation infrastructure and fees; KEPA performs water                                                                                                                                                                                                                                     |

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|                                                                                                                                 |                                                                                                                                                                                                                                                                                                                                                                                     | monitoring (IMPEL, 2015; Republic of Kosovo, 2010).                                                                                                                                                                                                                                                                                                                                         |
| <b>Law No. 03/L-160 on Air Protection against Pollution (2010)</b>                                                              | Air quality standards, monitoring, emission controls.                                                                                                                                                                                                                                                                                                                               | Central jurisdiction (MESPI/KEPA network incl. the Hydro-meteorological Institute); municipal role limited to local dust/noise and heating-related measures; relevant to corruption in monitoring-data integrity (IMPEL, 2015; Republic of Kosovo, 2010).                                                                                                                                   |
| <b>Law No. 03/L-233 on Nature Protection (2010)</b>                                                                             | Protected areas, biodiversity, nature monitoring; KEPA provides professional opinions on management plans of protected areas.                                                                                                                                                                                                                                                       | Central jurisdiction over designation and standards; municipalities must respect protected-area regimes in planning and permitting, a check against corrupt rezoning (KEPA, n.d.; Republic of Kosovo, 2010).                                                                                                                                                                                |
| <b>Law No. 04/L-174 on Spatial Planning (2013)</b>                                                                              | Hierarchy of spatial plans; municipal spatial plans as instruments of land use and development.                                                                                                                                                                                                                                                                                     | Gives municipal assemblies plan-adoption powers subject to SEA and central plan hierarchy; planning capture is a principal grand-corruption channel addressed by the platform (Helvetas/Demos, n.d.; Republic of Kosovo, 2010).                                                                                                                                                             |
| <b>Law No. 04/L-175 on the Inspectorate of Environment, Water, Nature, Spatial Planning and Construction (2013, OG 43/2013)</b> | Central Inspectorate performs environmental inspection at central and local levels; may issue instructions to local inspectorates; local inspectorates are organized within municipal departments (Municipal Inspectorate of Environmental Protection; Municipal Inspectorate of Construction) and report to the central Inspectorate; ministry may require specific local reports. | Defines the two-tier inspection jurisdiction: municipal inspectors monitor locally and report annually (and ad hoc on request) to the central Inspectorate, which can pronounce fines and initiate criminal proceedings; the possibility of central instructions to local inspectorates is a coordination channel and a friction point the platform must manage (IMPEL, 2015; MESPI, 2023). |

#### INTEGRITY AND ACCOUNTABILITY LAWS BINDING ON MUNICIPAL INSTITUTIONS

| <b>Law</b>                                                                | <b>Obligation on municipal institutions</b>                                                                                                          | <b>Anti-corruption relevance</b>                                                                                                               |
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| <b>Law on Local Self-Government (03/L-040), accountability provisions</b> | Mayor reports to the Assembly at least every six months on economic-financial situation and investment plans; Assembly approves annual work plan and | Creates the reporting cadence the platform uses for its joint annual Environmental Integrity Report (Council of Europe, 2021; Rrahmani, 2025). |

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|                                                                                                       | annual report; municipal regulation of fees and charges.                                                                                                                                                              |                                                                                                                                                                                                                                                                                                                                      |
| <b>Law No. 04/L-042 on Public Procurement (as amended 2014/2016)</b>                                  | All municipal waste-service contracts, environmental works and concessions procured under this law; applies to regional waste companies as well.                                                                      | Procurement is the highest-frequency corruption channel in municipal environment; the platform proposes joint e-procurement monitoring and red-flag analytics (GAN Integrity, n.d.; Helvetas/Demos, n.d.).                                                                                                                           |
| <b>Law No. 04/L-045 on PPP / concession regime</b>                                                    | Concessions for waste collection, disposal, recycling and management must follow PPP rules.                                                                                                                           | Concession award and supervision are grand-corruption risks; platform proposes joint concession oversight reviews (Helvetas/Demos, n.d.).                                                                                                                                                                                            |
| <b>Law No. 06/L-11 on Prevention of Conflict of Interest in the Discharge of a Public Function</b>    | All municipal officials, assembly members and inspectors must avoid conflicts of interest; senior officials subject to two-year cooling-off restrictions (no contracts with or representation of former institution). | Central enforcement by APC; municipalities must maintain internal registers and refer suspected cases; no lobbying regulation exists in Kosovo, so local lobbying of municipal officials is unregulated, a gap the platform addresses through its own transparency rules (OECD, 2026; UNCAC Coalition & Kosovo Law Institute, 2024). |
| <b>Law No. 08/L-108 on Declaration, Origin and Control of Assets and Gifts</b>                        | Asset declarations for a comprehensive list of public officials including municipal ones; gifts must be declared; false or non-declaration is a criminal offence.                                                     | APC verifies declarations (full verification for selected senior officials, random for others); municipalities provide the first-line completeness checks (OECD, 2026; UNCAC Coalition & Kosovo Law Institute, 2024).                                                                                                                |
| <b>Law on Protection of Whistle-blowers</b>                                                           | Municipalities must establish internal whistleblowing procedures; APC supervises the law.                                                                                                                             | Detection of environmental corruption depends heavily on insiders (inspectors, procurement officers); platform proposes a shared, protected whistleblowing channel with Serbian/Albanian language access (OECD, 2026; UNCAC Coalition & Kosovo Law Institute, 2024).                                                                 |
| <b>Law on Access to Public Documents (06/L-081) and Law on Protection of Personal Data (06/L-082)</b> | Municipalities must grant access to environmental permits, inspection records, contracts; Information and Privacy Agency supervise.                                                                                   | Access-to-information compliance is the foundation of third-party oversight; platform makes proactive publication mandatory across the four municipalities (OECD, 2026).                                                                                                                                                             |

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| <b>Criminal Code of Kosovo</b>                                                                          | Criminalizes active/passive bribery (1–10 years), extortion, abuse of office, money laundering, private-sector bribery.                                                    | Defines the criminal perimeter of environmental corruption; gives platform-defined referral duties to police/prosecution (GAN Integrity, n.d.).                                                  |
| <b>Law on the Auditor General / National Audit Office framework</b>                                     | Municipal finances, including environmental service payments, are subject to annual external audit; documented remarks where waste services were paid from capital budget. | Audit findings are a key corruption-intelligence source; platform includes structured follow-up of OAG environment-related findings (Helvetas/Demos, n.d.).                                      |
| <b>Law No. 03/L-049 on Local Government Finance and Law on Local Self-Government finance provisions</b> | Municipal revenue autonomy incl. own-source revenues and fees; central funding of delegated competences must cover expenditure.                                            | Fee-setting for waste and water services is a municipal discretion vulnerable to capture; platform proposes transparent fee-setting methodology (Council of Europe, 2021; Helvetas/Demos, n.d.). |

#### LIST OF CENTRAL INSTITUTIONS AND THEIR JURISDICTION IN KOSOVO NORTH

The following central institutions exercise jurisdiction over the territory of North Mitrovica, Zvecan, Leposavic and Zubin Potok. The platform is designed to connect municipal actors to each of these bodies through a single regional interface.

| <b>Central institution</b>                                                                 | <b>Legal basis</b>                                                    | <b>Jurisdiction in Kosovo North relevant to environmental corruption prevention</b>                                                                                                                                                                                                                                                                                                                     |
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| <b>Ministry of Environment, Spatial Planning and Infrastructure (MESPI, formerly MESP)</b> | Law No. 03/L-025; government regulation on organization of ministries | Develops, coordinates, monitors and oversees environmental protection, water resources management and spatial planning; issues environmental consents and IPPC licences for Annex I installations; reviews EIA reports; grants municipal-tier screening decisions; issues sub-legal acts; lead authority for EU acquis approximation under the SAA (IMPEL, 2015; KEPA, n.d.; Republic of Kosovo, 2010). |
| <b>Kosovo Environmental Protection Agency (KEPA)</b>                                       | Law No. 03/L-025, Art. 59 (established 2006–2007)                     | Integrated environmental monitoring (air, water, soil, biodiversity); environmental databases and information systems; professional opinions on EIA reviews and protected-area management plans; State of the Environment reports; scientific support for enforcement (European Commission, 2008; IMPEL, 2015; KEPA, n.d.).                                                                             |
| <b>Inspectorate of Environment, Water, Nature, Spatial Planning</b>                        | Law No. 04/L-175 (OG 43/2013)                                         | Performs environmental inspection at central and local levels across all four municipalities; may issue instructions to municipal inspectorates; receives their annual and ad                                                                                                                                                                                                                           |

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| <b>and Construction (within MESPI)</b>                                                          |                                                                                   | hoc reports; has power to pronounce fines and initiate criminal proceedings; Chief Inspector heads two divisions (environment/water/nature; spatial planning/construction/housing) (IMPEL, 2015; MESPI, 2023).                                                                                                                                    |
| <b>Agency for the Prevention of Corruption (APC, formerly KAA)</b>                              | Anti-corruption legislation; Law No. 06/L-11; Law No. 08/L-108; whistleblower law | Kosovo's main independent prevention body: asset-declaration verification and publication, conflict-of-interest supervision, gift rules, whistleblower protection; applies fully to municipal officials of the four municipalities (OECD, 2026; UNCAC Coalition & Kosovo Law Institute, 2024).                                                    |
| <b>Kosovo Police (incl. local police stations; EULEX retains monitoring/mentoring role)</b>     | Law on Police; UNSCR 1244 framework; EULEX mandate                                | Investigates corruption and environmental crime; local station commanders in Serb-majority municipalities selected with enhanced municipal participation rights (Law 03/L-040 Art. 23); platform proposes a dedicated environment-corruption focal point in the regional police directorate (Council of Europe, 2021; European Commission, 2006). |
| <b>State Prosecutor / Basic Prosecution (Mitrovica region) and Kosovo Prosecutorial Council</b> | Law on State Prosecutor; Criminal Procedure Code                                  | Prosecutes bribery, abuse of office and environmental crimes; targeted-case programs since 2015 (prioritized corruption cases) largely failed to deliver convictions, underscoring the referral-quality problem the platform addresses (Council of Europe, 2019; UNCAC Coalition & Kosovo Law Institute, 2024).                                   |
| <b>Courts (Basic Court of Mitrovica; Court of Appeals; Supreme Court; Constitutional Court)</b> | Law on Courts; Constitution                                                       | Judicial review of EIA and permitting decisions within 30 days of environmental consent; review of administrative acts; constitutional complaints; NGOs promoting environmental protection deemed to have sufficient interest to challenge decisions (Republic of Kosovo, 2010).                                                                  |
| <b>Office of the Auditor General / National Audit Office (NACO)</b>                             | Constitution; Law on Auditor General                                              | Annual audits of all four municipal budgets including waste-service payments and capital projects; special audits on request; audit remarks on waste payments from capital budgets are documented (Helvetas/Demos, n.d.).                                                                                                                         |
| <b>Ministry of Local Government</b>                                                             | Government regulation; Law on Local Self-                                         | Administrative supervision of municipalities limited to legality review; consolidation and support of municipal administration; channel                                                                                                                                                                                                           |

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| <b>Administration (MAPL / MAPLD)</b>                                                               | Government supervision provisions (Arts. 74–86)                                                | for municipal complaints against central interference; supports inter-municipal cooperation (Council of Europe, 2021; Rrahmani, 2025).                                                                                                                                                    |
| <b>Information and Privacy Agency (IPA-AG)</b>                                                     | Law No. 06/L-081 (access to public documents); Law No. 06/L-082 (personal data)                | Supervises municipal compliance with access-to-information law in all four municipalities; central appeal instance for refused environmental documents (OECD, 2026).                                                                                                                      |
| <b>Kosovo Business Registration Agency (KBRA), Register of Beneficial Owners</b>                   | Law No. 08/L-265 on the Register of Beneficial Owners (November 2024)                          | Maintains beneficial-ownership register; competent authorities have direct access; enables identification of hidden ownership in waste companies, quarries and contractors winning municipal environmental tenders (OECD, 2026).                                                          |
| <b>Procurement Review Body (PRB) and Public Procurement Regulatory Commission</b>                  | Law No. 04/L-042                                                                               | Reviews procurement complaints for municipal tenders incl. waste and environmental works; platform channels systemic red-flag patterns to the regulatory commission (Helvetas/Demos, n.d.; UNCAC Coalition & Kosovo Law Institute, 2024).                                                 |
| <b>Ministry of Agriculture, Forestry and Rural Development (MAFRD) and Kosovo Forestry Agency</b>  | Law on Forestry; Law No. 03/L-040 Art. 18 (delegated felling licenses under Government rules)  | Owns forestry policy; municipalities issue felling licenses under delegated authority and rules adopted by the Government; central forestry inspection interface relevant to illegal-logging control in Leposavic/Zubin Potok (Council of Europe, 2021; Rrahmani, 2025).                  |
| <b>Kosovo Cadastral Agency</b>                                                                     | Law No. 03/L-040 Art. 18 (delegated cadastral records)                                         | Central custodian of cadastral data; municipalities keep cadastral records under delegation, the data layer on which corrupt land-use decisions depend; consolidation of cadastral records is a documented northern challenge (CBAP, 2019; Council of Europe, 2021).                      |
| <b>Water and Waste Regulatory Office (WWRO) / economic regulators for regional water companies</b> | Law on activities of service providers of water, sewage and waste; Law on Waste fee provisions | Regulates tariffs and service standards of regional water companies supplying the north; municipalities contract annually with regional companies; fee regulation was originally central and was transferred to municipalities with the Waste Law (Helvetas/Demos, n.d.; Rrahmani, 2025). |
| <b>Ministry of Justice / inter-institutional Rule of Law coordination bodies</b>                   | Strategy on Rule of Law 2021–2026                                                              | Coordinates the state anti-corruption strategy process (ongoing, CoE methodology); the platform aligns municipal action with the                                                                                                                                                          |

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|                                                                |                                                    | national framework (OECD, 2026; UNCAC Coalition & Kosovo Law Institute, 2024).                                                                                                                                                                |
| <b>EULEX (EU Rule of Law Mission)</b>                          | CSDP mandate under UNSCR 1244                      | Monitors, mentors and advises police, judiciary and customs on corruption and organised crime, incl. northern municipalities; retains limited executive powers; a natural international partner for the platform (European Commission, 2006). |
| <b>EU Office in Kosovo / EU-facilitated Dialogue framework</b> | SAA (2016); Brussels Agreement (2013) and Dialogue | Political framework within which governance in the north is assessed; the 2025 closure of parallel offices shows that central-local tensions directly affect the platform's operating environment (Jurist, 2025).                             |

## POLICY PROPOSAL

**The Kosovo North Environmental Integrity Platform****Antidote to the architecture of impunity**

## REGIONAL PLATFORM NEEDS ASSESSMENT

Each of the four municipalities is individually small and as an administrative unit each municipality have limited weight in technical, legal and even political aspect to pose a credible threat to the major and significant financial and political interest that shape the all trends in Kosovo north.

From the point of the administrative landscape each municipality holds identical environmental competences over contiguous territory sharing the Ibar river system, common waste flows (regional landfill), quarries and forests that have shared negative effect, and common economic actors. Corruption pressure does not respect municipal boundaries, thus following stateless that could be baseline for development of this mechanism are true in every sense:

**Statement 1.** *A waste operator excluded from one municipality by a clean tender can bid in the next municipality*

**Statement 2.** *An inspector transferred under pressure can be re-employed across the boundary and*

**Statement 3.** *Felling permits and riverbed extraction shift to the weakest-governed corner.*

Coordination failure between four administrations and a dozen central bodies multiplies the discretion of every individual official. A regional platform is therefore not an additional layer of government but a risk-pooling/hedging and information-pooling/exchange arrangement among four constitutionally autonomous municipalities, expressly enabled by Article 124 of the Constitution (inter-municipal cooperation) and by the Law on Inter-municipal cooperation (No. 03/L-010). It requires no new competences: it organizes the exercise of existing ones.

Considering the experience of complex political and inner ethnic relationship between Albanian majority from central level and Serbian community and its leadership in the Kosovo north, the initiative as this one is expected to be welcomed strong opposition and resistance. The evidence to support this statement is Kosovo's resistance to greenlight establishment of the Association/Community of Serbian Majority Municipalities as derivative of the Brussell's dialogue. Serb majority municipalities are representing the realms of the most significant environmental goods and service resource base including water resources and quality aquatic ecosystems (lake Gazivode and Ibar river), forest sector, solid wood and commodities resources (highest rate of forest designated use per capita in Kosovo) and even wildlife habitat and biodiversity reservoir. Consolidated interest and joining effort and human resources could/would diminish capacity of central institution in pursuing agenda straightening control with arbitrary and capricious procedures to satisfy the interest majority ethnic group against the minority.

This collaborative mechanism should produce following trends:

- Mitigate the shortage of quality human resources and institutional capacities thus produces efficient and more effective service to the citizens.
- It would strengthen legal and political representation to protect the interest of the natural resources' sustainability and overall livelihood of the inhabitants of four municipalities in Kosovo north
- Pinpointing accountability, including the accountability of the local administration that could be an asset in leadership development through democratic political processes.

That being said, the pathway toward establishing the regional mechanisms proposed in the paper might be unattainable in proposed format, but the objective is valid and from the national and local perspective it is legally doable. Once the Brussels dialogue elements and promises given to the Serbian community would be fulfilled, this instrument could become an integral part of it.

#### VISION, GOAL AND OBJECTIVES

Vision: that by 2030 the four municipalities of Kosovo North are a reference region of Kosovo for clean environmental governance where permits, plans, fees, tenders and inspections are transparent, data-driven and corruption resistant, and where citizens and businesses trust environmental decisions.

Goal: to establish within twelve months, and operate thereafter, a permanent inter-municipal platform that prevents, detects and ensures referral of environmental corruption in the four municipalities.

Specific objectives:

1. **Objective 1.** Map and publish all environmental discretion points in the four municipalities (permits, plans, fees, tenders, inspections) within six months of establishment.
2. **Objective 2.** Establish a shared case-registry and data-exchange protocol among the four municipal administrations, municipal inspectorates and central counterparts within nine months.
3. **Objective 3.** Cut the average processing time and increase the predictability of municipal environmental permits through published service standards and e-tracking, reducing face-to-face discretion.
4. **Objective 4.** Institutionalize joint oversight of environmental public procurement and concessions through red-flag analytics and a joint review committee.
5. **Objective 5.** Operate a protected, bilingual (Serbian/Albanian/English) regional whistleblowing channel linked to APC and police focal points.
6. **Objective 6.** Publish a joint annual Environmental Integrity Report for Kosovo North, presented to the four municipal assemblies and sent to MESPI, APC and the OAG.

#### LEGAL BASIS AND FORM

The platform is established by a Memorandum of Understanding (MOU) signed by the four mayors and endorsed by the four municipal assemblies in the form of municipal decisions, under the Constitution (Art.

124), the Law on Local Self-Government (Arts. 17 and 24 on inter-municipal cooperation) and the Law on Inter-Municipal Cooperation (03/L-010). The MOU will: define membership and organs; commit signatories to the data-exchange protocol; establish the Joint Environmental Integrity Committee; set the rotating Secretariat; regulate costs (shared equally, with donor support sought for start-up); and provide a dispute-resolution clause (escalation to MAPLD good offices, then mediation). The MOU creates no legal acts binding third parties and no new fees or taxes; it is an instrument of cooperation among municipalities, reviewable only for legality as any municipal act.

#### GOVERNANCE STRUCTURE

- Assembly of the Platform: composed of four delegations (mayor + two assembly members) from each municipality; meets twice yearly; approves the annual work programs, the joint integrity report, and amendments to the MOU.
- Joint Environmental Integrity Committee (JEIC): the working organ, 8 members (two per municipality: one administration official, one assembly/oversight member) plus one co-opted civil-society representative and one academic expert as observers; meets monthly; prepares the integrity report; runs the red-flag reviews; oversees the whistleblowing channel; refers cases.
- Rotating Secretariat: hosted by each municipality for six-month terms (first host: North Mitrovica); two staff seconded from host municipality (one legal, one data/IT); maintains the case-registry, website and document repository.
- Working groups:
  - Permits and Planning WG;
  - Waste and Procurement WG;
  - Forestry, Water and Natural Resources WG;
  - Data, Transparency and GIS WG.
- Interface organs with central institutions: standing quarterly liaison meetings with MESPI Inspectorate regional office, APC regional focal point, Basic Prosecution (Mitrovica), OAG regional audit team, IPA-AG, KRPP/PRB, and KEPA; EULEX and the EU Office invited as observers.

#### CORE PREVENTIVE AND DETECTION MECHANISMS

- **Mechanism 1.** Public discretion-point map. Each municipality publishes a consolidated register of all environmental decision points: permit types and legal bases, fee-setting acts, planning instruments in force, active tenders and concessions, inspection plans. Updated quarterly.
- **Mechanism 2.** Joint environmental permit and inspection register. A shared database (GIS-linked) of all municipal environmental permits, screening decisions, inspection visits, findings and sanctions across the four municipalities; access tiered for the public (published fields) and for oversight bodies (full fields). Aligned with KEPA's environmental information systems and the EIA Law's public-information provisions, which the Ministry must make available within 8–15 days of request (Republic of Kosovo, 2010).
- **Mechanism 3.** Service standards and e-tracking. Maximum deadlines required documents and one-stop submission for municipal environmental permits; every application receives a tracking number;

decisions published within 5 days of issuance. Removes the informal 'facilitation' market around permit queues.

- **Mechanism 4.** Procurement and concession red-flag analytics. The Waste and Procurement WG screens every municipal environmental tender and active concession quarterly for: single-bidder patterns; recurrent winners; beneficial-owner overlaps (checked against the Law No. 08/L-265 register); price outliers vs. peer municipalities; contract amendments; and payment delays. Findings go to the municipal procurement officer, with systemic patterns reported to the PRB and the regulatory commission.
- **Mechanism 5.** Conflict-of-interest and asset-declaration support. Standardized COI declarations for all officials in environmental functions; random cross-checks of officials' interests against permit and tender beneficiaries; suspected cases referred to APC, which holds the statutory mandate (OECD, 2026).
- **Mechanism 6.** Protected regional whistleblowing channel. Web, telephone and in-person intake in Serbian, Albanian and English; anonymous option; case handling protocol jointly agreed with APC (statutory supervisor) and police; feedback duty to whistleblowers; annual publication of aggregated statistics.
- **Mechanism 7.** Inspection-integrity protocol. Joint code for municipal environmental and construction inspectors: risk-based inspection plans (RMCEI-aligned, per the harmonization already pursued by the central Inspectorate [IMPEL, 2015]); rotation of inspectors across municipalities every 18 months; mandatory second-inspector verification for sanctions above defined thresholds; documented refusal procedure for improper instructions, with escalation to the Chief Inspector under Law 04/L-175.
- **Mechanism 8.** Plan-integrity procedure. For municipal spatial plans, local waste plans and zoning changes: mandatory corruption risk assessment (methodology borrowed from APC's CoE-based public-risk analysis [OECD, 2026]), ex-ante public consultation records, and SEA compliance verification before assembly adoption.
- **Mechanism 9.** Referral and case-management SOP. Standard operating procedure for forwarding suspected corruption (to police/prosecution), administrative violations (to inspectorate), disciplinary matters (to municipal bodies), and data irregularities (to KEPA/cadastre); a register of referrals with status tracking, so that no case 'disappears'.
- **Mechanism 10.** Citizen and CSO participation. Public hearings on the joint integrity report; environmental CSOs from both communities invited as standing observers to the JEIC; school and media programmes on environmental rights under the Aarhus-derived EIA participation provisions in force (Republic of Kosovo, 2010).

#### RELATIONSHIP TO CENTRAL INSTITUTIONS

The platform is complementary to, and does not substitute for, central jurisdiction. MESPI retains permitting of significant installations, EIA consent and IPPC licensing; the central Inspectorate retains its inspection mandate and its power to instruct local inspectorates (which the protocol converts into structured coordination rather than ad hoc interference); APC retains statutory anti-corruption powers; prosecution and courts retain criminal and judicial functions. The platform's value to central institutions is data quality and

early warning: a consolidated regional view of permits, inspections and tenders that no single central body currently possesses. Conversely, the platform's value to municipalities is a single door through which central instructions, data requests and referrals flow, reducing arbitrary interference and transactional dependency on individual officials.

#### IMPLEMENTATION ROADMAP (2026–2030)

| Phase                                   | Period            | Key milestones                                                                                                                                                                                                                                                                         | Lead                     |
|-----------------------------------------|-------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------|
| <b>Phase 0<br/>Mandate</b>              | Q4 2026           | Four mayors sign negotiation mandate; assembly consultations in all four municipalities; draft MOU and data protocol prepared with MAPLD and MESPI advice.                                                                                                                             | Mayors; MAPLD            |
| <b>Phase 1<br/>Establishment</b>        | Q1–Q2 2027        | MOU signed; assemblies endorse municipal decisions; JEIC constituted; Secretariat (North Mitrovica host) staffed; standing liaison with central institutions agreed; baseline corruption-risk assessment of the four municipalities' environmental functions completed.                | Assembly of the Platform |
| <b>Phase 2<br/>Instruments</b>          | Q3 2027 – Q2 2028 | Discretion-point maps published; joint permit/inspection register operational; service standards and e-tracking piloted in two municipalities; whistleblowing channel live; procurement red-flag analytics first run; inspection-integrity protocol adopted by all four inspectorates. | JEIC; Working Groups     |
| <b>Phase 3<br/>Consolidation</b>        | 2028              | Full rollout to all four municipalities; first joint annual Environmental Integrity Report presented to assemblies and central institutions; training programme for all environmental officials and inspectors (with KEPA, MESPI Inspectorate, APC, KJI for judicial actors).          | Secretariat; JEIC        |
| <b>Phase 4<br/>Evaluation and scale</b> | 2029–2030         | Independent external evaluation (commissioned jointly, financed by donors); lessons codified; consideration of permanent inter-municipal body under Law 03/L-010; handover plan for sustained municipal co-financing.                                                                  | Assembly of the Platform |

#### MONITORING, EVALUATION AND INDICATORS

| Objective                                   | Indicator                                     | Baseline            | Target (2029) |
|---------------------------------------------|-----------------------------------------------|---------------------|---------------|
| <b>O1<br/>Discretion-point transparency</b> | Share of mapped environmental decision points | Partial, fragmented | 100%          |

|                                     |                                                                                                                                   |                             |                                                                                           |
|-------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------|-----------------------------|-------------------------------------------------------------------------------------------|
|                                     | publicly available in all four municipalities                                                                                     |                             |                                                                                           |
| <b>O2<br/>Data exchange</b>         | Municipalities transmitting complete permit/inspection data to the joint register on time                                         | 0                           | 4 of 4; ≥90% timeliness                                                                   |
| <b>O3<br/>Permit integrity</b>      | Share of municipal environmental permits issued within published service standard                                                 | Not measured                | ≥85%                                                                                      |
| <b>O4<br/>Procurement oversight</b> | Share of environmental tenders and concessions screened for red flags within the quarter                                          | 0%                          | 100%                                                                                      |
| <b>O5<br/>Whistleblowing</b>        | Channel live; cases referred within statutory deadlines; whistleblower feedback provided                                          | None                        | Channel live from Q1 2028; 100% referral SOP compliance                                   |
| <b>O6<br/>Integrity reporting</b>   | Joint annual Environmental Integrity Report adopted by all four assemblies                                                        | None                        | Annual, starting 2028                                                                     |
| <b>Outcome</b>                      | Number of administrative violations and corruption referrals in environmental matters arising from platform-generated information | Not systematically recorded | Established and rising year-on-year (detection effect), with conviction follow-up tracked |

Evaluation: annual self-assessment by the JEIC plus an independent external evaluation in Phase 4. All indicators disaggregated by municipality to allow peer comparison, a proven integrity incentive in inter-municipal settings.

#### RISK ANALYSIS AND MITIGATION

| <b>Risk</b>                                                                                                                                                                                               | <b>Likelihood impact</b> / | <b>Mitigation</b>                                                                                                                                                                |
|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Political polarisation around Kosovo North governance; platform perceived as partisan or as encroaching on the Dialogue agenda (cf. 2025 parallel-office closures and EU reaction [Jurist, 2025]).</b> | High / High                | Strictly technical, service-delivery framing; bilingual operation; MAPLD and EU Office observer status; no engagement with status questions; MOU under existing cooperation law. |
| <b>Municipal non-cooperation or one municipality blocking decisions.</b>                                                                                                                                  | Medium / Medium            | Consensus-minus-one decision rule for non-substantive matters; rotating host; MAPLD good-offices clause; visible early wins (permit tracking) to build constituency.             |

|                                                                                                                                                                           |                   |                                                                                                                                                                                                       |
|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Central-local friction: central Inspectorate instructions to local inspectorates seen as interference, or platform seen as bypassing central bodies (IMPEL, 2015).</b> | Medium / Medium   | Formal liaison protocol with MESPI/Inspectorate and APC; platform acts as data and coordination layer, never as decision-maker.                                                                       |
| <b>Data-protection and personal-data breaches in the shared register.</b>                                                                                                 | Medium / High     | Legal review against Law No. 06/L-082; tiered access; DPIA before launch; IPA-AG consulted.                                                                                                           |
| <b>Staff capture or platform itself becoming a corruption node.</b>                                                                                                       | Low-Medium / High | JEIC composition mixing administrations and assemblies; CSO observers; published minutes; annual independent evaluation; APC guidance on platform officials' declarations.                            |
| <b>Donor dependency.</b>                                                                                                                                                  | Medium / Medium   | Municipal co-financing schedule from year three; low operating design (secondments, shared systems); integration of platform tasks into job descriptions.                                             |
| <b>Parallel or unconsolidated practices re-emerging, undermining data completeness.</b>                                                                                   | Medium / High     | Early coordination with MAPLD on consolidation; publication duty creates traceability; referral SOP covers data irregularities; EU Dialogue developments monitored without platform taking positions. |

## CONCLUSION

Environmental corruption in Kosovo North is not a single crime, but a system of discretionary opportunities scattered across four small administrations, a dozen central bodies and an unresolved political context. Kosovo's legal framework already contains the necessary instruments: municipal own competences in environmental protection, waste, planning and inspection; central permitting, monitoring and inspection powers; a prevention-focused anti-corruption agency; audit, access-to-information and judicial review mechanisms; and an EU-driven approximation agenda that keeps standards moving upward.

What is missing is connection. The Kosovo North Environmental Integrity Platform proposed here connects the four municipalities to each other and to the central system through a standing, low-cost, legally modest arrangement: shared data, shared oversight of procurement and permits, a protected whistleblowing channel, an inspection-integrity protocol, and a joint annual report that makes integrity performance publicly comparable.

The platform asks nothing of the political process on status questions, and everything of the administrative process on transparency. It is, in that sense, exactly the kind of institution the northern municipalities can build for themselves, and the kind that citizens on both sides of the Ibar can equally verify with their own eyes.

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