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Informal Waste Collection in Kosovo: Challenges and Opportunities (municipalities of Prishtinë/Priština, Lipjan/Lipljan, Fushë Kosovë/Kosovo Polje, Obiliq/Obilić, and Gračanica/Graçanicë)

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Working Towards a Stable Multi-Ethnic Kosovo

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ECMI Kosovo is the principal non-governmental organisation engaged with minority issues in Kosovo, with the overarching aim to develop inclusive, representative, community-sensitive institutions that support a stable multi-ethnic Kosovo. ECMI Kosovo contributes to the developing, strengthening and implementation of relevant legislation, supports the institutionalisation of communities-related governmental bodies, and enhances the capacity of civil society actors and the government to engage with one another in a constructive and sustainable way.

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LIST OF ACRONYMS AND ABBREVIATIONS

ABPE	Advisory Board for Protection of Environment
AMRK	Kosovo Agency on Protection from Radiation and Nuclear Safety
CRC	United Nations Convention on the Rights of the Child
ECMI Kosovo	European Centre for Minority Issues Kosovo
EPAK	Environmental Protection Agency of Kosovo
EU	European Union
GIZ	German Federal Enterprise for International Cooperation
HFA	Health for All
IPA	Instrument for Pre-Accession Assistance
ILO	International Labour Organisation
KEK	Kosovo Energy Corporation
KLMC	Kosovo Landfill Management Company
MESP	Ministry of Environment and Spatial Planning
MLSW	Ministry of Labour and Social Welfare
POE	Public Owned Enterprises
Prishtina REA	Prishtina Regional Enterprise Agency
PRKWM	Plan of the Republic of Kosovo on Waste Management
RADC	Roma and Ashkalia Documentation Centre
SRI Kosova	Schweizer Rohstoffhandel International Kosova
SRKWM	Strategy of the Republic of Kosovo on Waste Management
UN	United Nations
UNDP	UN Development Programme
UNICEF	UN International Children's Emergency Fund
WWRO	Water and Waste Regulatory Office

1. INTRODUCTION

This report aims to provide an overview and analysis of the current state of informal waste collection and management in Kosovo, with a particular focus on the Roma, Ashkali, and Egyptian communities engaged in informal waste collection in Prishtinë/Priština, Lipjan/Lipljan, Fushë Kosovë/Kosovo Polje, Obiliq/Obilić, and Gračanica/Graçanicë. The report also provides an overview of the formal waste collection and management sector in the abovementioned municipalities by analysing the legal framework, role, and competences of public waste collection companies, and municipal/central-level authorities in charge of public services and waste. Moreover, the report presents highlights of a survey conducted with informal waste collectors by ECMI Kosovo, in partnership with HFA and RADC, in the abovementioned municipalities, aiming to obtain a better understanding of their collection efforts, practical needs and challenges faced. Finally, the report discusses existing projects and stakeholders in the informal waste collection sector, while focusing on the challenges and opportunities ahead with the specific aim of improving the working conditions and socio-economic status of vulnerable Roma, Ashkali, and Egyptian community members in Kosovo.

Waste collection and its sorting, transportation, and ultimate management is a complex affair, encompassing several different actors with varying levels of organisation in Kosovo. At the highest level, the Ministry of Environment and Spatial Planning (MESP) is in charge of the overall legal framework—including primary and secondary legislation—regulating waste management, storage, recycling, and the related standards.[1] At the mid-level, regional waste collection companies collect waste from various private and public waste containers in Kosovo, and transport it to large waste collection centres, commonly dubbed "waste depots" or "landfills". These regional companies usually cover several municipalities, who have a say in the management of the companies through a board member they appoint to the Board of Directors. In the region of Prishtinë/Priština, encompassing all five (5) target municipalities of the project (Municipality of Prishtinë/Priština, Lipjan/Lipljan, Fushë Kosovë/Kosovo Polje, Obiliq/Obilić, and Gračanica/Graçanicë), the public regional waste management company handling waste and its management is "Pastrimi", headquartered in Prishtinë/Priština.[2] According to the Law on Public Enterprises and the "Pastrimi" Statute, the latter is owned by the municipalities according to a set percentage of stocks, with the Municipality of Prishtinë/Priština being the largest stockowner

[1] http://mmph-rks.org/en-us/The-Ministry
[2] http://pastrimi.info/index.php?option=com_content&view=article&id=165&Itemid=577&lang=en

with 77% of ownership.[3] In addition to garbage and waste collection, "Pastrimi" also performs secondary functions which it then bills to the respective municipalities (such as washing publicly owned roads, snow removal, etc.) As such, "Pastrimi" carries out an important public service, covering a significant number of citizens stretching over a large number of municipalities, including the capital Prishtinë/Priština. Despite this, or perhaps due to it, "Pastrimi" operates at a financial loss, and has difficulties coping with the growing amount of waste and low payment levels.[4]

Kosovo has a wide-ranging, yet underutilized waste collection market, which has led to the development of an informal waste sector, in addition to the public waste companies that operate in the same field. This informal waste sector, which is present throughout the country, is primarily composed of individual waste collectors engaged in waste collection in an unorganised, fragmented manner.[5] Most recyclable waste comes to private companies from informal waste collectors who, after collecting waste they deem valuable, transport it to private companies and sell it to them. These small-to-medium sized companies hold a license from MESP to engage in waste management operations and run private collection centres that serve as drop-off points for informal waste collectors.

The individual waste collectors, a majority of whom are Roma, Ashkali, and Egyptian community members, work in particularly harsh conditions and for low wages. Generally, they work on an individual basis, or together with their family members, and have specific routes they take in search of waste and other goods they can sell. They operate at a subsistence level, and are in dire need of better equipment and transportation which would improve their collection efforts and reduce costs. They do not have any formal agreements with the operations/individuals that they sell their collected waste and goods to.[6]

This report aims to provide an overview of, primarily, the informal waste collection sector in Kosovo; provide specific information on the number of informal waste collectors, working conditions, types of waste collected and sold, etc., by individual informal waste collectors active in five (5) municipalities in the Prishtinë/Priština region; and finally, identify several opportunities in informal waste collection for Roma, Ashkali, and Egyptian community members in Kosovo. Specifically, this report presents and analyses concrete actions that can improve the economic conditions of informal waste collectors,

[3] http://www.kuvendikosoves.org/common/docs/ligjet/2008_03-L087_en.pdf and http://www.pastrimi.info/index.php?option=com_content&view=article&id=95&Itemid=579&lang=sq

[4] http://www.institutigap.org/documents/17680_POE%20Online%20010315%20-%20En_final.pdf

[5] ECMI Kosovo interviews with private operations and individual waste collectors, January-March 2015.

[6] ECMI Kosovo Report on the Questionnaire conducted in cooperation with its partners with Roma, Ashkali, and Egyptian community members engaged in waste collection under the project "Increasing Employment of Roma, Ashkali and Egyptian Communities through a Recycling Collective", funded by the EU, managed by the EU Office in Kosovo and implemented by ECMI Kosovo, March 2015.

organise informal waste collectors into a formal structure, which would provide a platform for their voices and concerns to be heard, and enhance the long-term sustainability of any such actions.

1.1 METHODOLOGY

In order to obtain a comprehensive overview of informal waste collection and management in the five (5) target municipalities, a combination of quantitative and qualitative methods and data collection techniques was used. This includes a comprehensive review of existing literature and statistics, field research among individuals engaged in informal waste collection, as well as direct meetings with informal waste collectors, municipal and public authorities, and relevant private companies and stakeholders.

In order to obtain relevant and pertinent information from informal waste collectors directly, a general survey was designed and conducted over a period of two (2) months (January-February) with approximately 120 participants. Questionnaires were distributed within five (5) targeted municipalities: Prishtinë/Priština, Fushë Kosovë/Kosovo Polje, Obiliq/Obilić, Gračanica/Graçanicë, and Lipjan/Lipljan; focusing on a balanced ethnic and regional composition of participants from the three (3) communities: Roma, Ashkali, and Egyptians. Participants were asked an array of open-ended questions, ranging from their engagement in waste collection, the number of family members engaged in informal waste collection, transportation routes and modes, the type of materials collected and sold, as well as questions on household economy, prices they get for their collected goods, and the (in)existence of formal agreements with private companies or stakeholders, etc.

The questionnaire was answered directly by informal waste collectors in their working environment, and participants were asked to express their opinions freely and without hindrance or exaggeration. Naturally, some of the information provided cannot be fully verified independently (e.g. household income, general levels of poverty, whether participants received any assistance from other institutions beforehand, etc.). However, in subsequent direct meetings and interviews it was established that the information provided was consistent, and there is no specific reason to doubt the information provided.

More than 50 interviews and direct meetings were conducted with informal waste collectors, municipal authorities (including three meetings with mayors and four meetings with deputy mayors), as well as private companies engaged in informal waste collection, and other stakeholders that have projects

related to the waste collection and management system in Kosovo. These interviews and meetings were guided by the questions in the questionnaire, and were conducted over a period of several months in different locations, in order to obtain as much of a comprehensive overview of Kosovo's informal waste collection sector as possible.

Finally, ECMI Kosovo conducted a comprehensive review of existing literature and reports from national and international organisations, with a view towards obtaining relevant and pertinent information on previous and existing projects, reviewing their experiences and "best practices", and getting as much information on some of the risks and drawbacks faced by said organisations and projects.

2. INSTITUTIONAL AND LEGAL FRAMEWORK ON WASTE COLLECTION AND MANAGEMENT

As briefly outlined in the introduction, different institutions and companies across Kosovo are involved in the management of waste. In the past few years, several legal instruments and policy strategies were adopted to advance the state of waste management in Kosovo. This section will present an overview of these various entities, and their competences, as well as the legal framework and policies pertaining to the subject. The Law on Waste[7] lays down the basic principles on waste, and denotes the government bodies competent for waste management operations and policies.

> The Law on Waste, Article 4, defines waste management as "activities for elusion and reduction of waste production and their effect in environment and in the human health, collection, transportation, treatment, reuse, and processing, recycling and final disposal of waste, including supervision and care even after carrying out these actions."

The priorities for waste management in Kosovo, summed up in the Law on Waste, include the following: the prevention of waste, waste processing, recycling of waste, utilisation of waste, and the disposal of waste in landfills.[8] Both the municipalities and ministry are the primary competent institutional bodies for the management of waste.

2.1 CENTRAL GOVERNMENT INSTITUTIONS AND COMPETENCES IN WASTE MANAGEMENT

The Ministry of Environment and Spatial Planning (MESP) is the main government body in charge of waste management. MESP carries out a wide-range of duties, such as, determining the legislative and policy framework related to waste management, drafting of the central level plan and strategy for waste management and issuing licences for waste management.[9]

[7] *Law on Waste*, (04-/L-060), 2012.
[8] *Ibid,* Article 5/5
[9] *Law on Waste*, Article 14.

The Minister of MESP issues waste management licences. The licence can be refused if the waste treatment methods to be used are in conflict with the Law on Waste, particularly regarding environmental protection and human health.

According to the Law on Waste, Article 22, the following licensed entities can perform waste management operations:

Institutions, public or private companies registered under law

The Law on Waste refers to legal sub-acts to regulate the procedure and criteria to obtain waste management licences. Legal persons that hold a licence can only perform in the designated waste management activities. Such activities include the collection, transportation, treatment, reuse, processing, recycling, final disposal and supervision of waste. An application for a waste licence is to be lodged with MESP and should be accompanied with a broad array of documents and certifications as specified in the Administrative Instruction MESP Nr. 09/2014.[10] The necessary documents include a Municipal Environmental Permit for waste management, business registration certificate, fiscal number certificate, tax certificate, plan for waste management, documented university level qualifications of technical manager and a list of equipment and vehicles. Applicants will only receive a licence from MESP if they are able to meet all these requirements. Once the licence has been awarded, it remains valid for a period of up to five (5) years.

LICENCE RELATED COSTS	FEE
Applying for a waste licence	10 EUR
Obtaining a waste licence	500 EUR
Additional activities	200 EUR
Licence duplicate	50 EUR

Figure 2.1: Costs related to waste management licences

Apart from MESP, other ministries take part in certain areas of waste management. The Environmental Protection Agency of Kosovo (EPAK) is responsible for creating databases and information systems for

[10] *Administrative Instruction on Waste Management License*, Ministry of Environment and Spatial Planning, No. 09/2014.

waste management, as well as the compilation of reports. The Ministry of Health and the Ministry of Agriculture, Forestry and Rural Development, together with MESP, are responsible for regulating the management of medical waste. Although government institutions have different mandates, and their communication and coordination could be improved, each of them remains a key player on the state of waste management and recycling. Kosovo has adopted the EU Directive on packaging waste.[11]And while Kosovo's legal framework on waste management is generally in accordance with EU directives, it's the implementation and enforcement of legal acts that encounter numerous problems. As a result, Kosovo is unable to meet the environmental protection standards of the EU, which, consequently, means there are still considerable health risks for citizens.[12]To address and overcome these challenges, measures need to be adopted to improve the legislative framework in the field of environment, policies need to be developed in line with European standards and the institutional capacity of central and local level governments has to be improved.[13]

2.2 CENTRAL STRATEGY AND PLAN FOR WASTE MANAGEMENT

MESP is in charge of drafting the Strategy of the Republic of Kosovo on Waste Management (SRKWM)[14] and the Plan of the Republic of Kosovo on Waste Management (PRKWM).[15]



[11] *Directive 94/62/EC on Packaging and Packaging Waste*, European Parliament and Council, 20 December 1994.
[12] *Kosovo, Country Environmental Analysis Cost, Assessment of Environmental Degradation, Institutional Review, and Public Environmental Expenditure Review,* World Bank, 2013.
[13] *IPA 2012 Annual Programme, Waste Management: 09-2012/02*, European Commission, 2012.
[14] *Strategy of the Republic of Kosovo on Waste Management 2012-2021*, Ministry of Environment and Spatial Planning, 2012.
[15] *Plan of the Republic of Kosovo on Waste Management 2012-2016,* Ministry of Environment and Spatial Planning, 2012.

The SRKWM sets out the vision on waste management for Kosovo. As such, the main objective of the Strategy is to create measures that will reduce the amount of waste. It includes, amongst others, the description and assessment of the existing state of waste management and measures to be taken for municipal, solid and non-hazardous waste management.[16]

The SRKWM is applicable for a period of ten (10) years, and will be reviewed every five (5) years. Its baseline is the establishment of a sustainable system for waste management, in accordance with the standards and requirements of EU directives. Moreover, contributing to increasing employment in Kosovo is one of the main goals of the aforementioned strategy.

The Plan on Waste Management of Kosovo was drafted based on the SRKWM; it is the operational part of the latter. The general aim of the Plan is to reduce the amount of waste, and decrease the level of pollution in compliance with local, EU, and other international standards. It has to contain, amongst others, goals to reduce, reuse, treat or recycle the waste in the territory, and a description of the locations of equipment, and facilities, for waste treatment and disposal.[17]

MESP drafted the PRKWM in cooperation with different stakeholders, such as NGOs and operators providing waste collection services.[18] It was issued for a period of five (5) years, and can be reviewed when deemed necessary.[19] The current PRKWM is implemented within the time frame 2012-2016. The plan sets a comprehensive list of priorities for the period 2012-2016, including contribution to increased employment, education of the public, and the construction of buildings for integrated waste systems (reduction, reuse, recycling, incineration, and disposal).

2.3 KOSOVO LANDFILL MANAGEMENT COMPANY (KLMC)

The Kosovo Landfill Management Company J.S.C (KLMC) is a central, publicly-owned enterprise established by the Law Nr. 03/L-087 on Publicly Owned Enterprises. KLMC is a Joint Stock Company, registered as such in accordance with the Law Nr. 02/L-123 on Business Organisations. It is the sole licensed company authorised and mandated to manage and maintain regional sanitary landfills in the Republic of Kosovo.[20] KLMC operates four (4) Sanitary Landfills and one (1) Transfer Station which serve

[16] *Law on Waste*, Article 9.
[17] *Law on Waste,* Article 10/6.
[18] *Ibid.* Article 10/7.
[19] *Ibid*, Article 10/5.
[20] Annual Report of Activities of the Kosovo Landfill Management Company, Ministry of the Economic Development of Kosovo, 18.03.2013.

as drop-off points for waste collected and transported to the landfills by regional waste companies, as well as private companies engaged in waste collection and management. They are located in the following municipalities:

- Sanitary Landfill in Mirash (Prishtinë/Priština)
- Sanitary Landfill in Dumnicë (Podujevë/Podujevo)
- Sanitary Landfill in Landovicë (Prizren)
- Sanitary Landfill in Velekincë (Gjilan/Gnjilane)
- Transfer Station (Ferizaj/Uroševac)

The landfills are open to both the public and private waste management sector companies, in agreement with the KLMC. The KLMC serves some 23 clients in total, ranging from regional waste companies, municipal waste companies, as well as private companies that deal with waste and related by-products.[21] It had a turnover of slightly over 1 million EUR for the fiscal year 2013.[22] KLMC's relations with several regional waste companies are strained due to alleged non-payment of bills, however, and it has refused to accept waste by the regional waste companies "Pastrimi" and "Ekoregjioni" several times in the past.[23]

2.4 MUNICIPAL LEVEL COMPETENCIES IN WASTE MANAGEMENT

According to the Law on Local Self-Government[24], municipalities are responsible for local economic development, local environmental protection, and waste management (as part of municipal public services). Regarding waste management, all municipalities have the following duties:

- Establishing waste management systems under the principle of waste management hierarchies for their territory, developing local plans for waste management and implementing these plans;
- Drafting the annual report on waste management;
- Regulating the responsibilities and obligations to perform services for waste management, and organising the waste management in their territory.

[21] http://www.kmdk-ks.org/?page=1,5
[22] *Annual Report of Activities of the Kosovo Landfill Management Company*.
[23] http://www.kmdk-ks.org/?page=1,4,25
[24] *Law on Local Self Government,* (03/l-040), 2008, Article 17.

It is possible for two or more municipalities to establish joint agreements on waste management.[25] Moreover, municipalities may issue legislation, legal sub-acts, which tend to regulate the functioning of the competent municipal authority and standards for waste management services.[26]

2.5 OTHER PUBLIC INSITUTIONS DEALING WITH WASTE

- **Water and waste regulatory office (WWRO)**

WWRO is the independent economic regulator for water and solid waste services in Kosovo. Its role is to ensure reliable services at a fair and reasonable price for customers, with respect for the environment and public health.[27]

- **Publicly Owned Enterprises (POE)**

Several regional waste companies, defined as local public enterprises, collect, transport, and dump waste in one or more municipalities. These regional waste companies include: "Pastrimi" in Prishtinë/Priština, "Ekoregjioni" in Prizren, "Ambienti" in Pejë/Peć, "Uniteti" in Mitrovicë/Mitrovica, "Çabrati" in Gjakovë/Đakovica, "EcoHigjiena" in Gjilan/Gnjilane and "Pastërtia" in Ferizaj/Uroševac.

- **Kosovo Agency on Protection from Radiation and Nuclear Safety (AMRK)**

AMRK is an executive governmental agency under the auspices of the Office of the Prime Minister.[28]The main target for the Agency is the adoption of a legal framework related to radiation protection and nuclear safety, licensing and inspection, and the creation of a safe and healthy environment for all citizens.

- **Advisory Board for Protection of Environment (ABPE)**

The Board, established by the Assembly of Kosovo, provides advice to the parliament and the government of Kosovo on environmental matters. The seven (7) members of the board are environmental experts and scientists appointed by the Assembly.[29]

[25] *Law on Waste*, Article 15/2
[26] *Law on Waste*, Article 15 /7
[27] *The State of Waste in Kosovo 2008 Report,* Kosovo Environmental Protection Agency, 2009, Nr 1.3.4.
[28] www.kryeministri-ks.net/?page=2,208
[29] *Law on Environmental Protection*, (03/L-025,) 2009, Article 62.

3 INFORMAL WASTE COLLECTION SECTOR IN KOSOVO

Waste management is a complex industry in Kosovo, encompassing a series of public and private actors at the municipal and national level. Waste is generally collected at designated collection points by regional waste companies, and dumped into landfills without any type of sorting, organisation, or further processing. Government and ministerial strategies dealing with waste management are in existence, and are being implemented, albeit slowly.



Materials gathered at a recycling collection centre in Kosovo. © ECMI Kosovo

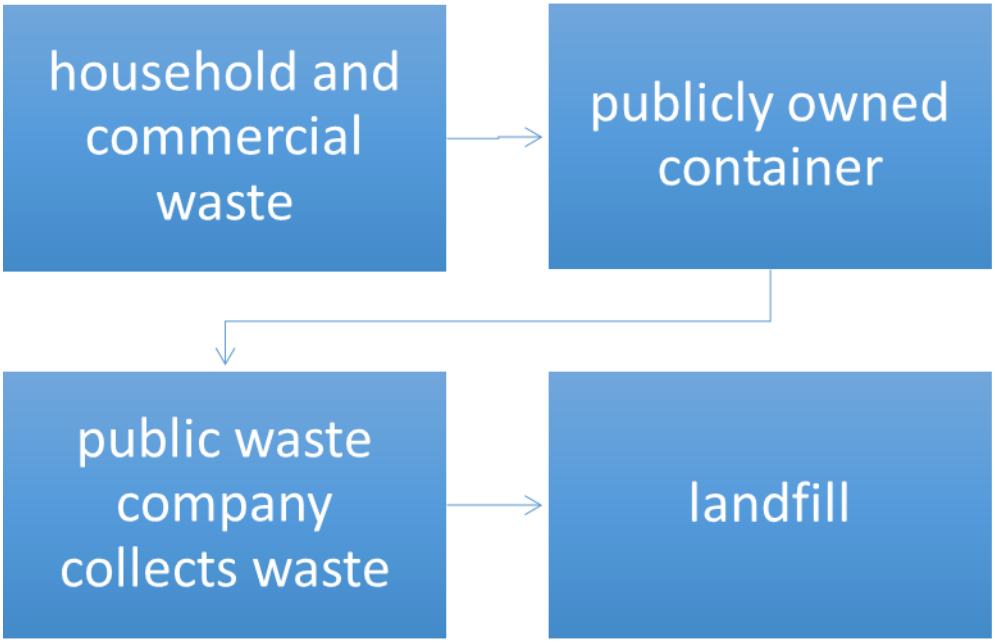
The waste management chain is composed of several actors that represent competing—but also complementary—forces in the waste market.

P**ublic regional companies** collect waste from designated collection points in urban and rural areas, and then transport said waste to designated landfill sites managed by the Kosovo Landfill Management Company, another publicly-owned enterprise.

Private companies engaged in waste collection, management, and processing buy unsorted, unprocessed waste and other valuables from more than one source. These companies purchase waste from supermarket chains, private and public enterprises, as well as from informal waste collectors.[30] These companies are often licensed by MESP to perform various services of waste collection, transport,

[30] ECMI Kosovo direct meetings with managers from the following companies engaged in waste collection: Rec-Kos, Rrezi Com, E-Plus, Maxhuni Riciklim and SRI Kosova.

storage, management, and processing. The majority of the waste collected and processed by the companies is sold as export.[31]



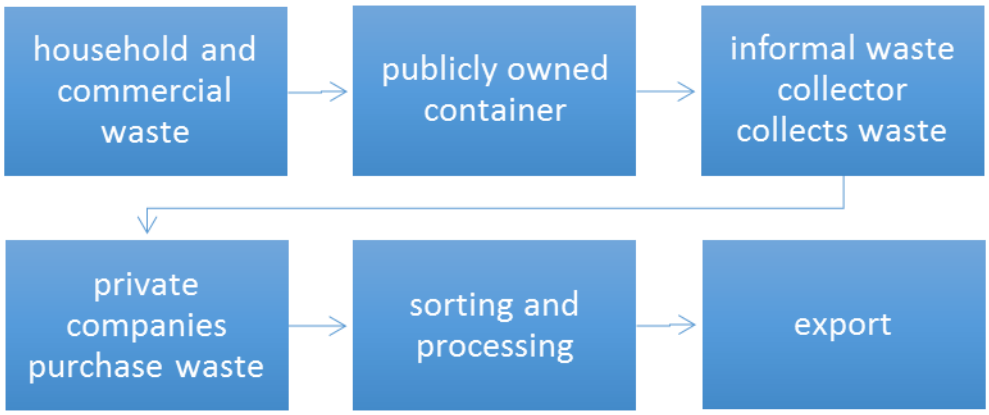
The final, and most important actor for the purposes of this report, are the **informal waste collectors** who primarily belong to the Roma, Ashkali and Egyptian communities. Individual informal waste collectors are the fundamental link between the formal and informal waste sector companies.



Materials gathered at a recycling collection centre in Kosovo. © ECMI Kosovo

[31] ECMI Kosovo interviews with several private companies engaged in waste collection in the Prishtinë/Priština region. Interview with Valdet Azemi, managing director of "S.R.I. Kosova", a private recycling and waste sorting company registered in Fushë Kosovë/Kosovo Polje.

Informal waste collectors go through publicly owned waste containers, owned and managed by regional waste companies, on a given municipal territory and select waste which they then sell to private companies engaged in waste collection and management. In addition to collecting waste from publicly owned waste containers, they also creatively find new sources of waste in informal and illegal dump sites. Informal waste collectors—who represent the largest non-registered, non-formalized waste collectors in Kosovo—are generally not organised around a formal structure, do not have official agreements with private companies, and come from the poorest and most marginalized parts of the society. Informal waste collectors are not licensed by MESP or any other relevant authority, as is required by the Law on Waste for all legal persons engaged in waste collection. They are not licensed for a multitude of reasons, chief among them being insufficient knowledge of the legal requirements and a general fear that they will lose any social welfare benefits they currently receive if formalised by licensing.



3.1 INDIVIDUALS ENGAGED IN INFORMAL WASTE COLLECTION

Informal waste collectors are individuals that collect, transport, and sell waste and other valuables which they collect from waste containers owned and managed by public regional waste companies, as well as from other sources, including restaurants, cafeterias, supermarkets, etc. These informal waste collectors, a majority of whom are of Roma, Ashkali, and Egyptian backgrounds, are almost always poor and marginalized members of society. Lacking in skills and education necessary to attain other jobs, and facing a choice between extreme poverty and waste collection, they turn to the latter as an income-

generating activity that is accessible and does not require special skills.[32] For these individuals, waste collection is usually the only source of earned income.[33] In addition to this being their only source of earned income, they also work in harsh conditions and are continuously exposed to hazardous materials as well as unsafe and unsanitary working environments.



Plastic waste in compound of informal waste collector in Fushë Kosovë/Kosovo Polje © ECMI Kosovo

SOCIO ECONOMIC BACKGROUND OF ROMA, ASHKALI AND EGYPTIAN COMMUNITIES

The Kosovo Human Development Index Report of 2012[34] illustrates that the Roma, Ashkali and Egyptian communities have unemployment rates of, respectively, 60.22, 60.46 and 80% in the private sector. The same low employment figures are also found in the public sector, where these communities remain severely under represented. As a result, and combined with high drop-outs rates from primary schools and low participations shares in higher education[35], employment opportunities for said communities remain scarce.

Members of the Roma, Ashkali and Egyptian communities have the highest unemployment rates compared with other communities in Kosovo. The majority of the community members who are

[32] https://www.ppiaf.org/sites/ppiaf.org/files/publication/Gridlines-44-Informal%20Recycling%20-%20MMedina.pdf
[33] A significant number of them receive social welfare benefits from the Ministry of Labor and Social Welfare and their respective municipality. ECMI Kosovo interviews with individual informal waste collectors, January-April 2015.
[34] http://hdr.undp.org/sites/default/files/khdr2012-eng.pdf

[35] *Community Rights Assessment Report Third Edition*, OSCE Mission in Kosovo, July 2012,

employed are in the lower wage sector, in positions not requiring any professional training.[36] As a result, the vast majority of said communities engage in the informal economy[37], commonly in informal waste collection.

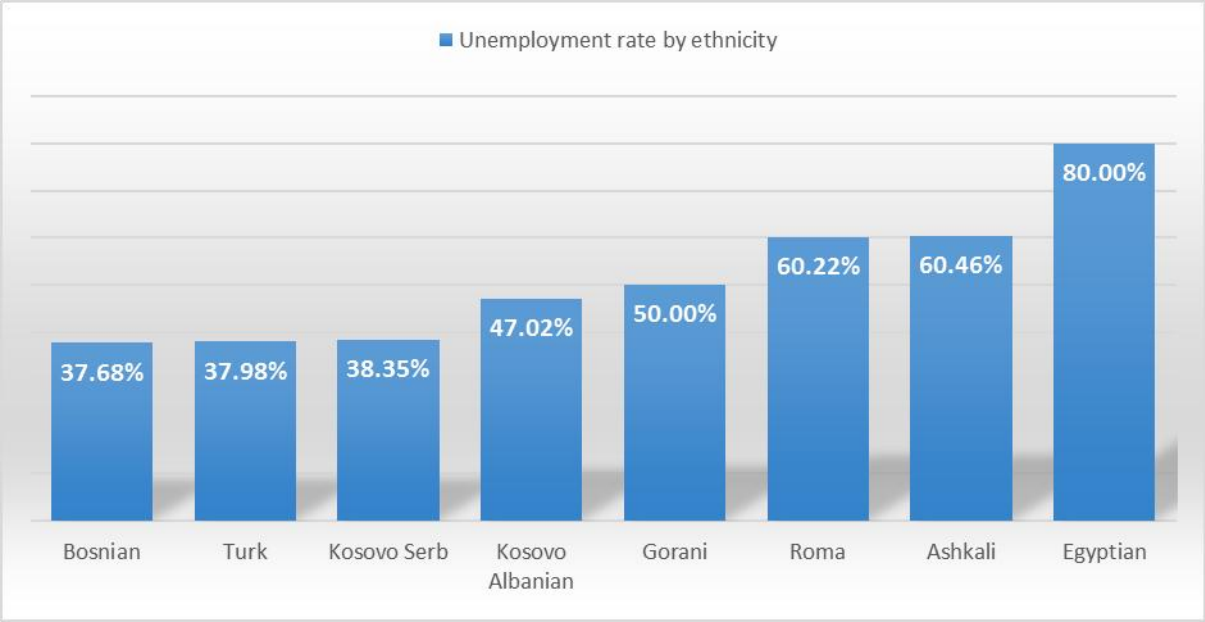


Figure 3.1: Unemployment rate by ethnicity[38]

These waste collectors work in unhygienic and unhealthy conditions, going through rubbish and industrial waste to collect raw materials. To generate income, they then sell recyclable materials to different recycling centres. Formal agreements between the waste collectors and the centres are, generally, not concluded. Hence, the individual waste collector remains extremely vulnerable, as they do not always receive a fair and reasonable price for the raw materials they offer. Consequently, waste collectors from the Roma, Ashkali and Egyptian communities are prone to double discrimination: because of both their ethnicity and marginally-viewed jobs, thus as a result they face social and economic exclusion.

[36] *Strategy for the Integration of Roma, Ashkali and Egyptian Communities in the Republic of Kosovo 2009-2015,* Office of the Prime Minister, 2008.

[37] There is no comprehensive data regarding the actual size of the informal economy in Kosovo. It is estimated that over half of the total employment in Kosovo takes place in the informal economy. See further: KRASNIQI and R. TOPXHIU, *The Informal Economy in Kosovo: Characteristics, Current trends and Challenges*, Journal of Knowledge Management, Economics and Information Technology, 2012.

[38] Unemployment figures by ethnicity from the *Kosovo Human Development Report*, UNDP, 2012.

INFORMAL WASTE COLLECTORS FROM THE ROMA, ASHKALI AND EGYPTIAN COMMUNITIES

In January and February 2015, ECMI Kosovo, in partnership with Health for All and Roma and Ashkalia Documentation Centre, conducted a survey with informal waste collectors and individuals engaged in informal waste collection in the five (5) target municipalities (Prishtinë/Priština, Fushë Kosovë/Kosovo Polje, Lipjan/Lipljan and Gračanica/ Graçanicë). The results of this survey found that the informal waste collection sector—though constrained in several aspects, financially and otherwise—is, nevertheless, thriving at the periphery of the formal waste collection sector. Private operations, and companies collecting and processing waste, are growing and in constant need of quality products.[39] However, a general theme in the responses is that individual informal waste collectors are limited in their efforts due to poor transportation means, insufficient knowledge of the market and limited storage capacities (more storage space would cut down their trips to the private companies thereby reducing their transportation costs), as well as poor and unsanitary working conditions in general.

Currently, no statistics exist on the actual size of informal waste collectors in Kosovo. As the majority of informal waste collectors in Kosovo are from the Roma, Ashkali and Egyptian communities, the figure below depicts the population sizes of these communities in the five (5) target municipalities.

Municipality	Total population	Number of members from the Roma community	Number of members from the Ashkali community	Number of members from the Egyptian community
Prishtinë/Priština	198,897	56	557	8
Lipjan/Lipljan	57,605	342	1,812	4
Fushë Kosovë/Kosovo Polje	34,827	436	3,230	282
Obiliq/Obilić	21,549	661	578	27
Gračanica/Graçanicë	10,675	745	104	3

Figure 3.2: The five (5) target municipalities in Kosovo according to the 2011 Census[40]

The numbers presented below reflect the number of informal waste collectors of the Roma, Ashkali and Egyptian communities who were part of the survey and who expressed their willingness to respond to

[39] ECMI Kosovo interviews with companies "Rec-Kos", "S.R.I. Kosova", April-May 2015.
[40] Statistics are to be found in the report, level, Kosovo Agency of Statistics, 2013.

the questions of the survey. These numbers do not represent the total amount of informal waste collectors in Kosovo.

Municipality	Waste collectors - respondents
Prishtinë/Priština	19
Lipjan/Lipljan	33
Fushë Kosovë/Kosovo Polje	21
Obiliq/Obilić	11
Gračanica/Graçanicë	8
TOTAL	**92**

Figure 3.3: Number of respondents engaged in waste collecting in the five (5) target municipalities

Respondents were asked to give their answers on how many members of their family, if any, are also engaged in collecting waste and other valuables. The table below shows the number of family members engaged in waste collection as a percentage of the total amount of surveyed informal waste collectors.

NUMBER OF FAMILY MEMBERS ENGAGED IN WASTE COLLECTION	% OF TOTAL NUMBER OF WASTE COLLECTORS
1 family member	33%
2family members	25%
3family members	9%
4 and more family members	4%

Figure 3.4: Number of respondents' family member(s) also engaged in waste collecting and other valuables

Most informal waste collectors are assisted by family members in their waste collection efforts. In three (3) cases, respondents indicated that their children also take part in collecting waste. Subsequent visits in the field and meetings/interviews with informal waste collectors also revealed that child labour is more prevalent than initially confirmed by those waste collectors surveyed.[41]

[41] As confirmed to ECMI Kosovo verbally by informal waste collectors, this is due to their reticence to admit to utilising their underage children for labour in a survey or other official document.

In the following question, the respondents were asked to provide the number of family members they currently support with their waste collection efforts. The results are listed in the following figure:

NUMBER OF FAMILIY MEMBERS SUPPORTED BY INCOME FROM WASTE COLLECTION	% OF TOTAL NUMBER OF WASTE COLLECTORS
1-3family members	12%
4-6family members	39%
7-9family members	33%
10 and more family members	10%

Figure 3.5: Number of family member(s) respondents support with their job

The table above shows that large families are generally dependent on the income generated by informal waste collecting efforts.

For the purposes of this survey, respondents were also asked about the amount earned on a monthly basis from informal waste collection. As shown in the graphic below, most of respondents tend to generate a monthly income ranging from 50-100 EUR.

AVERAGE MONTHLY INCOME	% OF TOTAL AMOUNT OF WASTE COLLECTORS
< 50 EUR	21%
50-100 EUR	67%
>100 EUR	12%

Figure 3.6: Average monthly income of the respondents

The following figure depicts the respondents' answers to whether they receive other sources of income, in addition to the income generated through informal waste collection, and, if so, to specify the type of income.

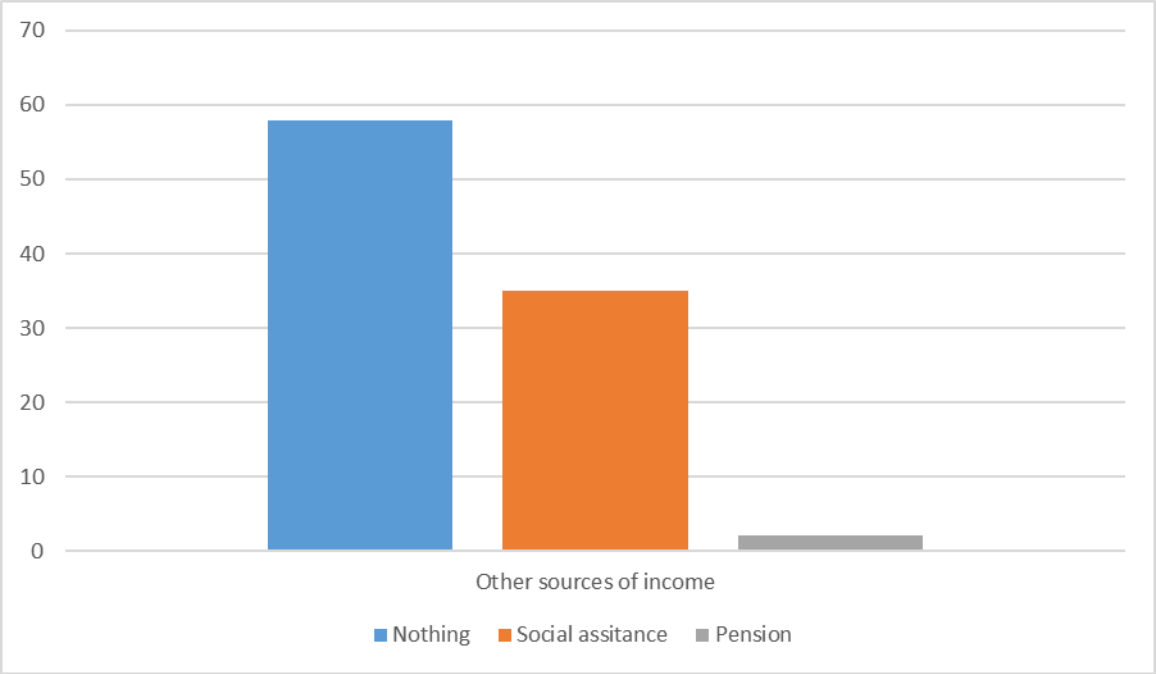


Figure 3.7: Other sources of income of the respondents

The following table shows the types of materials that the surveyed informal waste collectors gather as a percentage of the total amount of material collected.

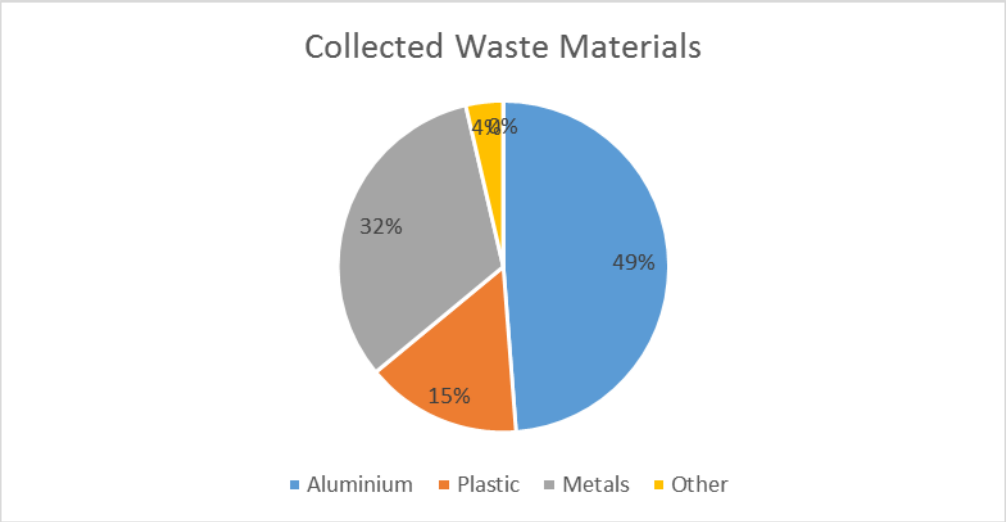


Figure 3.8: Type of waste collected by respondents

The surveyed informal waste collectors mainly collect aluminium cans and metals such as copper and iron from waste sites. Glass bottles and paper take up a rather marginal amount of the collected waste.

Informal waste collectors were then asked what type of equipment they currently utilize to collect and transport the collected waste.

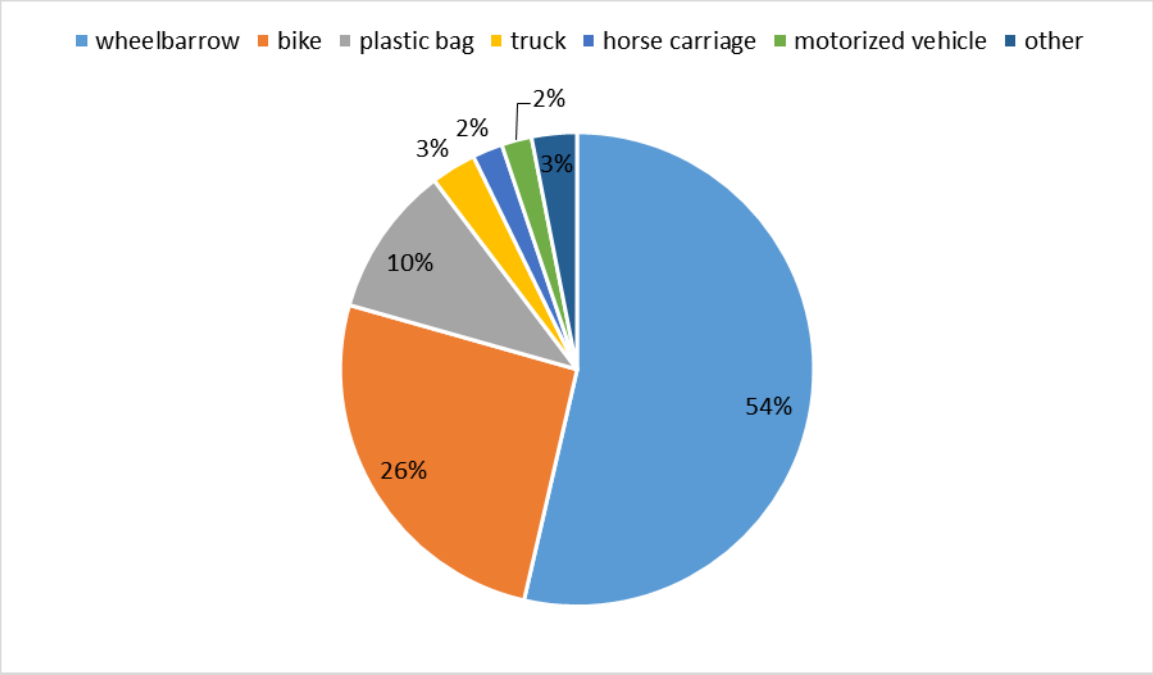


Figure 3.9: Equipment used for waste collection by respondents

As shown in figure 3.9, most of the respondents have a wheelbarrow or bike at their disposal to collect and transport the waste.



Informal Waste collector from Fushë Kosovë/Kosovo Polje. *© ECMI Kosovo*

The participants were subsequently asked if they have an agreement with companies where they bring the collected waste. Only one (1) respondent out of 88 stated to have such an agreement.

To conclude, the respondents were asked what specific assistance or equipment they most urgently need to improve their collection efforts, increase their efficiency and improve their safety and working conditions. The vast majority of the respondents indicated that they needed improved transport.

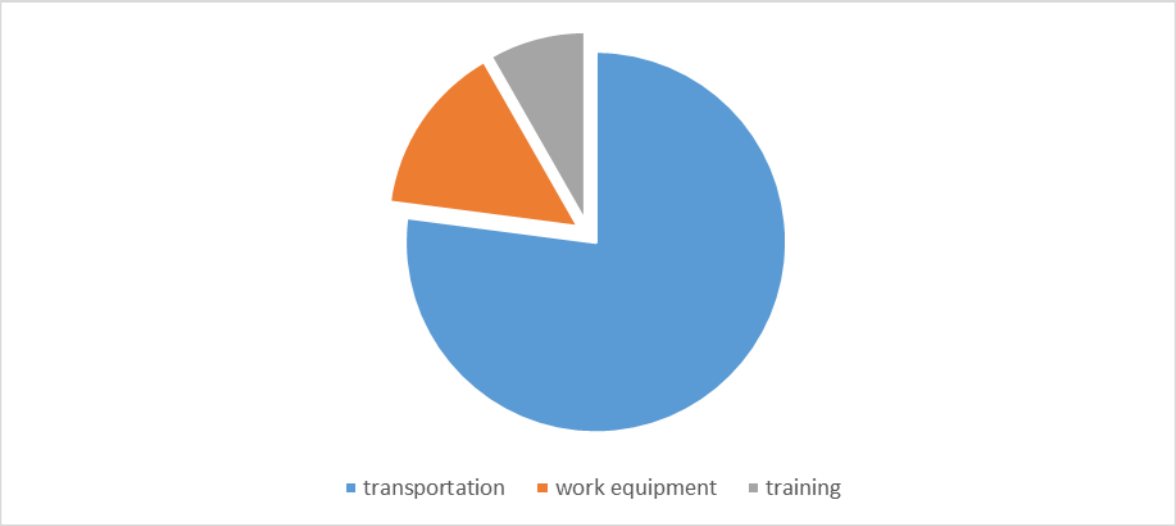


Figure 3.10: Needs of respondents

3.2 CHILD LABOUR AND INFORMAL WASTE COLLECTION

Kosovo is not a member of the United Nations (UN), and therefore, not a signatory party to the UN Convention on the Rights of the Child (CRC), though Article 22 of the Constitution of the Republic of Kosovo refers to the CRC.[42] Owing to a high prevalence of poverty and lacking or insufficient education, children belonging to the marginalised Roma, Ashkali, and Egyptian communities in Kosovo are frequently engaged in activities that could be classified as child labour in Kosovo, according to the Law on Labour.[43] Children belonging to these communities often engage in street work and begging, but many of them are also engaged in informal waste collection, either on their own or in support of their family.[44] Generally, they are not the main source of income for the family, but act as a significant contributor to it. More often than not, they work long hours begging or selling in the streets, or are

[42] *Constitution of the Republic of Kosovo*, Article 17.
[43] *Kosovo: 2013 Findings on the Worst Forms of Child Labor*, United States Department of Labor, 2013.
[44] *Ibid.*

exposed to harmful and hazardous materials when collecting waste and other valuables in container bins.[45]

Though the Law on Labour prohibits child labour under the age of fifteen (15) for general work and eighteen (18) for work with hazardous materials, an International Labour Organisation (ILO) study found that children as young as ten (10) are engaged in child labour, often with unsafe or hazardous materials such as waste, pesticides, etc.[46] A similar study, conducted by UNICEF, has found that some 87% of the children that work also attend school, made possible by the shift system,[47] particularly in urban areas. However, of the remaining 13% that work but do not attend school, a disproportionate number of them belong to the Roma, Ashkali, and Egyptian communities.[48] During the implementation of the UNICEF-funded project *Enhancing Access to and Retention in Education for Vulnerable and Disadvantaged Children*, implemented by ECMI Kosovo in partnership with UNICEF from May 2013 through October 2014, similar trends and numbers were noticed and reported. ECMI Kosovo and UNICEF targeted Roma, Ashkali, and Egyptian children not enrolled in school or in danger of dropout by supporting municipal authorities in enhancing their programs and planning with a view towards increasing enrolment and avoiding dropouts that affect these three communities disproportionately, also as a result of child labour amid general poverty.[49]

ECMI Kosovo's survey with informal waste collectors in Fushë Kosovë/Kosovo Polje, Lipjan/Lipljan, Obiliq/Obilić, Prishtinë/Priština, and Gračanica/Graçanicë, conducted in partnership with Health for All and Roma and Ashkalia Documentation Centre, has tackled the issue of child labour in informal waste collection in the abovementioned municipalities, and has tried to ascertain the prevalence, type of work performed, school attendance and associated issues directly with the parents of those children involved in informal waste collection.[50] As Figure 3.4 from the previous chapter illustrates, the vast majority of informal waste collectors operate in tandem with family members, though in most cases they did not

[45] *Curbing child labour in Kosovo: Let children be children*. International Labor Organisation, 09 February 2015.
[46] *Ibid.*
[47] Many schools in Kosovo, particularly those in urban areas, operate in several shifts in order to cope with the growing number of school children and inadequate schooling facilities.
[48] *Child Labour in Kosovo A Study on Working Children*, UNICEF.
[49] For more information on the project, objectives and results, please visit the following webpage http://ecmikosova.org/?p=3480
[50] ECMI Kosovo conducted a wide-ranging survey and questionnaire with informal waste collectors belonging to the Roma, Ashkali, and Egyptian communities from January-February 2015 in the five (5) target municipalities. In addition, ECMI Kosovo staff visited the five municipalities numerous times and met with informal waste collectors, private companies and operations engaged in waste collection, municipal officials, and other stakeholders. ECMI Kosovo also conducted field visits to the homes of individual waste collectors, where it conducted interviews and was able to ask direct questions—and receive answers—on a variety of topics covering child labour, schooling, socio-economic conditions, etc. These visits and interviews were conducted from January-April 2015 in the five target municipalities.

specify whether that includes underage children. In our direct interviews and visits, however, we were able to confirm that children under eighteen (18) and sometimes as young as fifteen (15) are often engaged in support of their family.[51] In other cases, children aged nine (9) and twelve (12) were not enrolled in school because, in the words of their parents, they cannot make enough money through waste collection to purchase supplies and clothing for school.[52] In subsequent interviews with some fifty (50) individual informal waste collectors, we were able to discern a trend of underage children either working collecting waste, or not enrolled in school for a variety of reasons, chief amongst them being high levels of household poverty leading to a general tendency towards using underage children to perform menial tasks in support of the household economy.[53]

The Ministry of Labour and Social Welfare (MLSW) has taken steps towards reducing and ultimately eliminating child employment, with a particular focus on child employment in dangerous and hazardous conditions such as waste collection. The MLSW, supported by the ILO, has adopted Administrative Instruction 05/2013 on the Prevention and Prohibition of Hazardous Child Labour in Kosovo. It has also drafted the Kosovo Action Plan for Prevention and Elimination of the Worst Forms of Child Labour, which aims to find "quick and solutions" to the problem of child employment. Similar initiatives have been initiated by the Kosovo Chamber of Commerce, which has been urging its membership to adopt codes of conduct and regulations "combating child labour in their respective supply chains and communities"; some 40 companies have done so thus far.[54]

Taking into account the fact that child labour is common, and quite frequent, in the informal waste collectors, and considering that a relatively large number of those individuals interviewed by ECMI Kosovo and who are engaged in informal waste collection, have acknowledged they are sometimes assisted by underage family members in their work, ECMI Kosovo aims to take every precaution necessary to, among others: a) inform and train selected participants that child labour is unlawful and detrimental to the physical and mental development of children, b) that it is harmful to their education and their ability to focus properly and give proper attention to their studies and coursework, c) that it is dangerous to their health and well-being. ECMI Kosovo also intends to take every step necessary to promote and realise standards of work that are respectful of the fundamental rights and principles

[51] Interview with informal waste collector E.K. in Fushë Kosovë/Kosovo Polje, 17 April 2015. The Law on Labour stipulates that individuals younger than 18 cannot work with hazardous materials.
[52] Interview with B.B informal waste collector in Fushë Kosovë/Kosovo Polje, 17 April 2015.
[53] Interviews took place over several months and were conducted directly, face-to-face, by ECMI Kosovo staff with some 50 individuals engaged in informal waste collection together with family members.
[54] *Fight against child labour gaining momentum in Kosovo, UN agency says*. UN News Centre. 09 February 2015.

enshrined in Kosovo's Constitution, legislation and the Convention on the Rights of the Child, while being cognizant of the need to create better opportunities and working conditions for the men and women engaged in informal waste collection in the five target municipalities.

4 CHALLENGES AND OPPORTUNITIES IN INFORMAL WASTE COLLECTION

Previous chapters provided an overview of the current state of informal waste collection in Kosovo, with a particular focus on five (5) municipalities in the Prishtinë/Priština region. As informal waste collection is a field that encompasses several actors on both the collecting and processing side of waste, a combination of opportunities remains to be explored for the benefit of informal waste collectors from the Roma, Ashkali and Egyptian communities.

As has been discussed extensively in previous chapters of this report, informal waste collectors from the Roma, Ashkali, and Egyptian communities are an extremely vulnerable group of individuals, suffering from high unemployment and poverty rates, relatively low levels of education, and poor marketable skills for the current job market in Kosovo. In addition, many of them support their families, which often tend to be rather large, with their work. For many of them, informal waste collection is the only source of income except social assistance benefits. Many of them work in harsh conditions without proper safety equipment and tools, and they have been exposed to unsanitary and hazardous materials for many years. Their needs are almost always immediate and urgent.

Bearing in mind that *informal waste collectors* perform waste collection in an informal, unregulated, and unlicensed manner, and that they do not pay taxes or other fees for access to publicly-owned and managed container bins, it can be safely concluded that there is a vested interest in the informal waste collectors themselves, in not formalizing and/or licensing their waste collection activities. Licensing fees as decided by MESP are prohibitively high for poverty-stricken waste collectors, and the list of requirements, including environmental permits from MESP and municipalities, for licensing as a business owner and operator is also quite extensive.[55] In addition, as many of them are recipients of social welfare assistance from the government due to their poor economic condition, there is a hesitance towards any formalization and licensing as they fear they will lose access to social welfare if formalized and paying taxes.[56]

[55] For a list of requirements and a breakdown of the fee structure please see Chapter 2.
[56] ECMI Kosovo interviews with informal waste collectors, January-May 2015.

Therefore, ECMI Kosovo recommends that a balanced, nuanced, and sensitive approach needs to be taken when addressing issues faced by individual informal waste collectors in Kosovo. As their needs are immediate and urgent, and their willingness to get formalized and licensed is less than enthusiastic, there is a need for short-to-medium term solutions that address pressing needs while laying the groundwork for longer-term, sustainable solutions in the future. Such solutions can be varied in nature and scope, depending on the needs of specific beneficiaries within a given municipality. They can include, but are not limited to, the provision of trainings on market conditions and how to improve their waste collection efforts through better knowledge of what the market demands, supplying them with tools and supplies needed for more efficient waste collection, trainings on valuable waste and materials other than those currently collected, subsidizing them through joint NGO-institutions-private sector schemes, establishing links with additional private waste companies in order to increase the pool of potential buyers, setting up short-term collection points subsidies through projects-institutions-municipal authorities, as well as a host of other measures that can have a direct impact on their day-to-day collection efforts and generate income. It should be noted, however, that previous attempts at subsidising recycling initiatives within households and neighbourhoods have not borne fruit; citizens continued to mix recyclable and non-recyclable waste and dump waste into containers with non-recyclables. This was due to a variety of reasons, including insufficient subsidies to make recycling worth the effort for households, low public awareness by citizens on the benefits of recycling and limited campaigns designed to raise the public's awareness on recycling, as well as inadequate coordination and communication between the actors involved.

SHORT-TERM RECOMMENDATIONS

1. BETTER WORKING CONDITIONS FOR INFORMAL WASTE COLLECTORS

An essential requirement for individuals to remain healthy and productive as they go about their daily working duties is a good working environment and proper equipment and tools as necessary for the type of work they perform. Informal waste collectors perform important work and are part of the overall waste management chains—albeit in an informal, unofficial capacity—but they do not benefit from said management chain in equipment, tools, or safety clothing. As we have seen in the survey, direct contacts with informal waste collectors, and extensive research, informal waste collectors suffer from poor working conditions, insufficient equipment and tools necessary for sanitary working conditions.

Waste collectors also lack sufficient knowledge and information on safe and sanitary working procedures to be followed when performing dangerous work with unhygienic and hazardous materials.

Due to abovementioned reasons, this represents a valuable opportunity for institutions and organisations seeking to improve working conditions for informal waste collectors through the provision of trainings in safe and sanitary working conditions, best practices in informal waste collection, and in supplying informal waste collectors with proper equipment and tools necessary for better and safer working conditions in this difficult, potentially dangerous economic activity.

2. IMPROVED TRANSPORTATION LEADING TO REDUCED COSTS AND LESS DOWNTIME

A significant part of the overall income/profit ratio in informal waste collection is the cost of transportation, both in actual money spent on transportation and in the time required to transport collected waste from containers to storage and finally to private companies that purchase said waste. The vast majority of surveyed informal waste collectors do not use motorised vehicles for waste collection, relying on either wheelbarrows, bicycles with various types of baskets used as transportation storage, or on collecting on foot with only a large sack used to carry collected waste from container bins to the private companies.[57] Some waste collectors hire a private truck to transport collected waste from their storage facility (usually their own backyard), to the private companies. This is both costly, eating up to 50% of income generated during a given week for some collectors, and a limiting factor on their ability to go out and collect that day as they must take care of the logistics (including loading the truck) during the day.[58] The resulting cost, in reduced income and increased downtime coupled with insufficient transportation means for the vast majority of informal waste collectors that cannot afford to hire private transportation, severely limits their ability to expand their activities which would generate additional income.

As part of our survey, we asked informal waste collectors what their most urgent needs were and what, specifically, would most improve their daily life as informal collectors, and the vast majority (more than 80%) cited improved transportation as their most urgent need. Informal waste collectors specifically mentioned moto-cultivators as a preferred transportation mode of theirs; however, as a large majority of them use either a wheelbarrow or a sack for transportation, other transportation tools can also be highly effective in improving their daily life by: a) reducing costs, b) significantly reducing the time and

[57] ECMI Kosovo survey and direct interviews with informal waste collectors, January-May 2015.
[58] *Ibid.*

effort it takes to transport collected waste from point A to point B, c) making it easier for them to collect and store more waste, and d) making frequent trips to the drop-off points possible during a given day.

As such, there is a genuine opportunity for institutions and other organisations to enhance the capacity of informal waste collectors to generate higher income, through the provision of better transportation in the form of either motorised vehicles, tricycles with larger baskets, or any other transportation tool as specified and decided upon at a later stage.

MEDIUM-TERM RECOMMENDATIONS

ESTABLISHING A FORMAL STRUCTURE LEADING TO BETTER REPRESENTATION OF THE INFORMAL WASTE COLLECTION SECTOR

The informal waste collection sector in Kosovo, and particularly Roma, Ashkali, and Egyptian community members engaged in collecting waste and other valuables as part of the sector, face a multitude of challenges as outlined in this report. One of the major challenges they face, and a severely limiting factor in their (in)ability to escape poverty through better coordination and support programs through Kosovo's institutions, is their lack of any formal structure or organisation that would have their voice heard and interests represented with municipal and central-level authorities. While private companies licensed for waste collection and management do have an avenue to discuss issues and problems faced by them, individual informal waste collectors are not licensed, do not have any formal links with licensing authorities in the waste sector, and are not part of the overall debate on waste, waste management, the environment, and upcoming initiatives on recycling in accordance with Kosovo's EU agenda.

As has been outlined previously in this report, and as will be discussed in some detail in the following paragraph, individual informal waste collectors are a highly vulnerable group that is engaged in waste collection primarily as a way to provide basic income for themselves and their families. Individual waste collectors are chiefly interested in immediate solutions for their most urgent problems such as poor and costly transportation, a lack of work tools and work safety issues faced on a daily basis. As such, it is imperative that as a short-term goal, their immediate situation be improved.

However, in order for their socio-economic well-being to fundamentally improve and for many of them to hopefully escape poverty and begin to think of waste collection as a business and not merely as a means of survival, individual informal waste collectors are in need of better organisation, through a

formal structure, leading to representation in the debate on waste and recycling that is on-going in Kosovo. This structure, which may be a non-governmental organisation, an Association, or any other format as provided by law, would not only represent individual informal waste collectors vis-à-vis the government and municipal authorities, but would also lobby the government and municipal authorities for employment, better working conditions, improved transportation tools, etc. It would also act as a link between private companies and individual informal waste collectors, thereby reducing potential downtime and increasing productivity through improved communication and coordination.

LONG-TERM RECOMMENDATIONS

1. ENABLING ACCESS TO PUBLICLY-MANAGED LANDFILLS

As we have seen above in Chapter 2, public, licensed landfills in the Republic of Kosovo are currently managed and maintained by the KLMC, a publicly-owned enterprise. KLMC's mandate is to maintain and manage regional landfills, which are used by regional public and private companies as a final depository for unwanted waste. KLMC does this by striking agreements with public and private companies (currently KLMC has 23 agreements with such companies), and by charging said companies for access to the landfills. Companies have access to the landfills in a limited fashion; they are allowed to dump unwanted waste into designated areas of the landfills, but are not allowed to take waste out of the landfills. This is also true for individual waste collectors.

There exists a fair opportunity for institutions and organisations to, through agreements with KLMC and regional waste companies, open up access to publicly-owned enterprises for informal waste collections. Opening up access to landfills for informal waste collectors would significantly improve access to resources for waste collectors, introduce new materials hitherto untapped by collectors, enhance their capacities to generate income in a structured, consistent manner, and it would also help KLMC and other waste authorities maintain and manage public landfills for a longer period of time due to reduced waste from waste collection. This, combined with better working conditions and improved transportation from/to the landfills, would be of significant benefit to the informal waste collectors as well as Kosovo in general.

However, opening up access to landfills for individual informal waste collectors is a complex affair that requires not only coordination between the KLMC as manager of the landfills and individual waste collectors themselves, but also communication and coordination between the former and various

municipal and central-level actors and experts on waste, health and occupational hazards. While informal waste collectors are likely to be trained on health risks related to waste collection in container bins, they will most certainly not have been trained for waste collection within landfills themselves. This, coupled with the previously mentioned challenges, necessitates communication, coordination, as well as trainings for informal waste collectors prior to any initiatives towards opening up landfills for waste collection. One possible way this could be accomplished in a safe and efficient way would be through the establishment of a pre-dump sorting facility staffed by informal waste collectors, including for example through a conveyor belt, which would have access to non-hazardous waste before it was dumped into the landfill, though the exact details and components of this system would have to be determined at a later stage after extensive research.

LICENSING OF INDIVIDUAL INFORMAL WASTE COLLECTORS

The Law on Waste foresees that companies and other entities performing waste-related activities shall undergo a licensing procedure which sets forth rights and responsibilities, according to applicable legislation and sub-legal acts, for waste collectors. As mentioned above, individual informal waste collectors are not licensed and therefore operate in an informal, unregulated manner. As such, their access to containers and other resources is provisional and can be curtailed at any time, without notice. Additionally, municipalities have begun implementing projects which shall, in due time, completely remove container bins and replace them with underground bins, particularly in the city centre.[59] These two processes represent potential risks to their business activities and may disrupt them entirely if they are not allowed to formally become a part of the waste management system.

Bearing this in mind, a licensing scheme for informal waste collectors could be introduced in order to formalise this unofficial sector, provide long-term access to resources to informal waste collectors, ensure that proper procedures are followed when collecting waste, and finally collect taxes and provide protection as afforded to all licensed waste collectors under the law. There are several potential risks with this, including a prohibitively high licensing fee for waste collectors as discussed in Chapter 2, Figure 2.1, high barrier for entry for untrained, unequipped informal waste collectors, and a potential unwillingness from informal waste collectors to participate in a licensing scheme. Nevertheless, a well-devised licensing scheme has the potential to turn informal, unlicensed waste collectors into formal, licensed and—most importantly—tax-paying business-operators, thus ensuring the long-term

[59] The Municipality of Mitrovicë e Jugut/Južna Mitrovica and Municipality of Prishtinë/Priština have begun replacing some of their normal container bins with underground bins.

sustainability of their business and waste collection in general. This would have the added benefit of making their work not only more official, but also more dignified. There is a certain social stigma attached to informal waste collection which, with proper licensing and equipment (uniforms, badges, etc.), would either be lessened or disappear altogether in the long-run as informal waste collection is slowly integrated into the structures of the formal waste collection and management sector.

A similar licensing scheme in the Former Yugoslav Republic of Macedonia, supported by USAID, has seen some success in licensing informal waste collectors in cooperation with the publicly-owned waste management enterprise "Komunalna Higiena". Informal waste collectors were supplied with ID cards and their activities were officially recognised as business activities.[60]

2. ESTABLISHING A FORMAL STRUCTURE TOWARDS BETTER BUSINESS CONDITIONS FOR THE INFORMAL WASTE COLLECTION SECTOR

The informal waste collection sector in the Prishtinë/Priština region—and particularly individual informal waste collectors in said region—is not currently organised in a way that would see actors, companies and individuals coming together to discuss issues of common concern shared by both. The vast majority of individual waste collectors do not have agreements with private companies, and private companies often cite the lack of an organised structure and a "common voice" as an impediment to increased waste collection and profits for both parts of the sector.[61] Informal waste collectors, on the other hand, lack the knowledge, resources, and technical know-how required for the establishing and running such a formal structure, and many of them are unaware of the benefits such an organisation would bring.[62]

A formal structure, in the form of an Association, Non-governmental Organisation, Cooperative, Social Enterprise etc., would, among others, act as a platform for its members to vocalise opinions and needs to the competent public authorities on waste management, recycling, local economic development, and employment. Membership would not be limited to informal waste collectors, but would also be open to relevant private companies and authorities competent in the field of waste management. Such a structure would also act as a platform for the formalisation of the informal waste collectors' profession and would contribute in perceiving such a profession in a more positive light. The structure would also assist in increasing the informal waste collectors' bargaining rights in relation with interested companies, and would help ensure the long-term sustainability of their fledgling positions vis-à-vis employment, income-generation, workers' rights, etc.

[60] http://www.plasticrecycling.org.mk/en/news/news_14.html
[61] "S.R.I. Kosova" Managing Director, Valdet Azemi, May 12, 2015.
[62] ECMI Kosovo survey and direct meetings with informal waste collectors, January-May 2015.

Importantly, Kosovo has not adopted a specific law on the establishment of social enterprises yet. Although there is no specific law on the issue, setting-up a social enterprise will have to meet the legal framework of two specific laws: firstly, the Company Law (Law No. 02/L- 123 on Business Associations),[63] and secondly, the Non-profit Law (Law No. 03/L-134 on Freedom of association in non-governmental organisations).[64] Recently, a Draft Law on the Amendment and Supplementation of the Law on Public Enterprises has been approved, which will lay the legal groundwork to register certain social enterprises as public enterprises owned by the Republic of Kosovo by initially removing them from the competence of the Kosovo Privatization Agency. This decision was made by the Assembly of the Republic of Kosovo.[65]

5 ECMI KOSOVO'S PROJECT ON INFORMAL WASTE COLLECTION

ECMI Kosovo is currently implementing the project "Increasing Employment of Roma, Ashkali and Egyptian communities through a Recycling Collective", funded by the European Union Office in Kosovo. The project, implemented in partnership with Health for All and Roma and Ashkalia Documentation Centre, aims to increase employment of informal waste collectors coming from the aforementioned communities by, among other activities, formalising their existing waste collection and recycling endeavours, assisting them in establishing a formal mechanism in charge of organisational aspects of their work and products, and by offering them trainings on a broad array of topics ranging from safety conditions, personal health, supplies and market best-practices. The project targets informal waste collectors who are already engaged in informal waste collection in five (5) municipalities in the Prishtinë/Priština region: Prishtinë/Priština, Fushë Kosovë/Kosovo Polje, Lipjan/Lipljan, Obiliq/Obilić, and Gračanica/Graçanicë. As part of the project, ECMI Kosovo conducted a survey with informal waste collectors in the abovementioned municipalities and the information gathered from the survey suggests that: a) informal waste collection is an important source of income for waste collectors, b) that informal waste collectors work in harsh conditions handling unsanitary and hazardous materials, c) that they have urgent needs for better transportation and other equipment, and that d) informal waste collectors are fragmented and would benefit from some form of organisation or formal structure.

[63] http://www.unmikonline.org/regulations/unmikgazette/02english/E2008regs/RE2008_26_ALE02_L123.pdf
[64] http://www.gazetazyrtare.com/e-gov/index.php?option=com_content&task=view&id=333&lang=en
[65] http://www.kryeministri-ks.net/?page=2,9,4083

Municipality	YES	NO	UNDECIDED
Prishtinë/Priština	16	1	2
Lipjan/Lipljan	29	4	/
Fushë Kosovë/Kosovo Polje	24	/	/
Obiliq/Obilić	10	/	1
Gračanica/Graçanicë	8	/	/
TOTAL	**87**	**5**	**3**

Figure 1.1: Number of respondents who want to participate in the project

As can be seen in Figure 1.1, the majority of respondents expressed their desire to participate in the project. Five (5) individuals were not interested in participating for unknown reasons, while three (3) remained uncertain.

The data collected from the surveys also show an urgent need for an immediate improvement of the harsh conditions that waste collectors are subjected to. Given that one of the main objectives is to improve the overall working conditions of participants, it is of utmost importance that the project aims to reduce the possibility of participants developing certain health diseases from exposure to such environments and hazardous materials. Therefore, the project foresees a number of training sessions on health risks and other related issues for the informal waste collectors from the Roma, Ashkali and Egyptian communities.

The overall goal of the project is to increase and, when applicable, formalise employment possibilities, while assisting selected participants to improve their working skills, increase their links with private waste companies, improve access to resources, and provide necessary tools and equipment for healthy and efficient work. ECMI Kosovo has established contacts with several organisations and institutions that are currently implementing projects or have implemented projects in the same or similar fields.[66] In order to combine synergies and avoid possible duplication of work and projects, ECMI Kosovo intends to cooperate with EU-funded and other projects in the best interest of our beneficiaries. As the project is limited in time and resources, establishing links and cooperation with other stakeholders will enforce

[66] Among the examples mentioned hereunder also other, however rather low scaled, recycling initiatives exist such as The Ideas Partnership Recycling Initiative in Fushë Kosovë/Kosovo Polje and the Kosovo Cap project with the aim to collect plastic bottle caps and trade them with a recycling company in exchange for wheelchairs for disabled Kosovars.

the overall impact on the target group. The following are some of the stakeholders ECMI Kosovo has established links with:

- **GIZ, the International Development Agency of Germany**

GIZ currently implements, through the Ministry of Local Government Administration of Kosovo, a project on waste management, for the period 2006-2016 in Kosovo.[67] The project focuses on the municipal level, and provides support for local authorities and regional waste utilities with the introduction of economically efficient and environmentally sound waste management systems. The involvement of citizens, through identifying participatory procedures, is essential to this initiative. The project's aim is that municipalities assume responsibilities for waste management in a citizen-centred way, based on a clear legal framework in accordance with EU standards.

- **Danish Refugee Council**

Another stakeholder, The Danish Refugee Council (DRC) is currently implementing an EU-funded project whose main aim is to increase employment by formalising the informal waste collection sector in Mitrovicë/Mitrovica. As part of the project, the DRC is going to build a physical building to house a social enterprise, who will act as an agent on behalf of the informal waste collectors.

- **Prishtina REA Project in Vushtrri/Vučitrn**

Apart from those specified stakeholders, the Prishtina Regional Enterprise Agency (Prishtina REA) is also implementing an EU-funded project in the municipality of Vushtrri/Vučitrn aimed at waste collection and recycling, including building a recycling plant. ECMI Kosovo and Prishtina REA have discussed cooperation mechanisms in detail and intend to pursue the topic in the interest of both projects and their beneficiaries.

[67] http://www.giz.de/en/worldwide/21121.html

COOPERATING WITH COMPANIES ENGAGED IN PRIVATE WASTE COLLECTION

From our information meetings with mayors, municipal directors of public services, potential participants, as well as from our direct meetings with several recycling companies in the five (5) target municipalities, we have identified the following companies as leaders in purchasing waste and other collected materials from informal collectors, and in generally having a working relationship with said informal collectors. These are private enterprises/companies that serve as collection and processing points for waste that is not covered by regional waste collection companies. As such, they have working relations not only with other private companies that produce waste as a by-product of their own activities, but also with informal waste collectors. The latter collect waste in container bins, and other dump sites, and then transport and sell that waste to the companies. The companies are licensed[68] to act as collection and processing points for waste and generally engage in sorting, baling, and processing waste in preparation of exporting said waste. They do not engage in wholesale waste collection themselves, but do have an interest in opening up new avenues of cooperation with both the formal and the informal waste collection sectors.[69] The companies are:

- "**Rec-Kos**", in Fushë Kosovë/Kosovo Polje, collects and shreds a wide range of materials, including PET bottles and other plastic waste, various types of metals including copper, aluminium. It is also the largest recycling company in the five (5) target municipalities.
- "**Rrezi Com**" in Fushë Kosovë/Kosovo Polje, collects mainly PET bottles, hard plastics, and limited quantities of metals. All of the collected materials are sorted, shredded, and sold for export.
- "**E-Plus**" in Prishtinë/Priština, collects various types of metals (aluminium, zinc, etc.), PET bottles, hard plastics, as well as accumulators. They have no baling machine, and outsource some of the work to larger companies. A majority of their products are sold as export.
- "**Maxhuni Riciklim**" in Obiliq/Obilić, collects various types of PET bottles and plastic products. It is based in the village of Milloshevë/Miloševo, close to Plemetin/Plemetina, a village inhabited mostly by Roma, Ashkali, and Egyptians. It also exports the vast majority of its products.

[68]Enver Tahiri, Head of Chemical and Waste Division at the MESP, 5 May 2015. MESP provided ECMI Kosovo with a list of licenced private companies engaged in waste collection and sorting. Tahiri also added that some private companies and/or operations engaged in waste collection in an informal manner do not have licences.
[69]ECMI Kosovo interviews with several medium-sized companies engaged in collecting, storing, and processing waste in the Prishtinë/Priština region, January-April 2015.

- "**SRI Kosova**" in Fushë Kosovë/Kosovo Polje, is a sister company of SRI AG (based in Lucerne, Switzerland). SRI Kosova collects paper, cardboard, plastic bottles, films, aluminium cans and prepares them for additional processing. The vast majority of its products are exported.

Generally, the aforementioned companies do not have any formal agreements with informal waste collectors on pricing and transportation, and purchase materials depending on the need of the individual. This allows them to diversify their supplies and avoid excess waste, but it has the side effect of not providing any security to the informal waste collectors; there is no guarantee their collected waste will be purchased by any of the companies. Additionally, as Kosovo is not a signatory party to the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal[70], companies registered in Kosovo cannot export waste and related materials to European countries; most recyclable waste is exported to Turkey and other non-EU countries.[71]

Cooperating with potentially interested companies and fostering increased cooperation between ECMI Kosovo, individual informal waste collectors, and interested companies already engaged in waste management, are seen as promising solutions to reach the project's stated objectives. Such cooperation may potentially result in improving, amongst other benefits, employability opportunities for the target group and would reach a wider scope with greater results, rather than when working separately.

This cooperation may also result in the informal waste collectors benefitting from additional income opportunities. Specifically, the participating informal waste collectors would likely become actors in the waste management process, gain stability, get exposed to humane working conditions, establish links with other potential employers, and increase their network, amongst other possibilities. Moreover, through these stated opportunities, our target group, the informal waste collectors coming from Roma, Ashkali and Egyptian communities, would be seen as legitimate workers in a more formal system, who are able to advocate for their rights in a unified manner. Though discussion on exact prices offered to informal waste collectors were largely avoided by the abovementioned companies, they tend to be fairly stable and predictable—though not lucrative—for the informal waste collectors. The following information was gathered from meetings with recycling companies, informal waste collectors, as well as other stakeholders dealing with recycling and related projects:[72]

[70] http://www.basel.int/Portals/4/Basel%20Convention/docs/text/BaselConventionText-e.pdf
[71] ECMI Kosovo interviews with private waste and recycling companies in Kosovo, January-May 2015.
[72] These figures vary significantly due to, among others, seasonal factors (plastic is easier to collect during spring and summer than in winter), the size of the purchase, consistency in supplying high-quality material to recycling companies, etc. It is

 **PET BOTTLES**	0.15-0.40 cents EUR/kg, depending on type and quality
 **GENERAL PLASTIC**	0.8-0.20 cents EUR/kg, depending on type and quality
 **METAL**	0.15-0.60 cents EUR/kg, depending on type and quality
 **PAPER**	0.5-0.10 cents EUR/kg, depending on type and quality

Type of materials and prices quoted by companies and informal waste collectors in the survey and in meetings

important to note, however, that these figures should not be taken as definitive but merely as indicative of the real prices due to companies not wanting to share trade secrets, and informal waste collectors citing lower than average prices due to the winter factor (meetings were held from January-March 2015).

6 CONCLUSION

Rapid urbanisation and migration from rural to urban areas after the conflict in 1999, economic growth leading to a boost in consumption and a rise in demand for goods, and increasing levels of mobility are increasingly putting a strain on the waste collection and management system in Kosovo. Due to limited resources and an insufficient infrastructure and organisational system, public utility and waste management companies are unable to cope with the rising rate of waste in Kosovo. They face the difficult task of providing collection services to all households in an efficient and environmentally sound manner, while facing infrastructure constrains and relatively low collection rates. As a result, an informal waste collection sector has emerged over the years, encompassing a wide variety of actors; from individual waste collectors trying to earn their daily living and all the way to relatively large private companies that serve as waste collection points before sorting, baling, and other processes related to waste. This informal sector in Kosovo has the potential to provide self-employment and reduce poverty for individual waste collectors, spurs investment and growth in private companies, while simultaneously helping the environment through reduced overall waste and increased recycling of existing waste.

Since the vast majority of informal waste collection functions outside formal channels, individual waste collectors are unable to benefit from structural integration in the waste management system that they, albeit through an intermediary, participate in. Individual waste collectors are a net benefit to the local economy and the municipality they collect waste in by taking waste and turning it into a tradable commodity, but they often operate in an unorganised, fragmented manner which sometimes leads to the creation of new, unofficial waste points, thereby increasing costs for public companies and municipalities. As they generally operate alone or in tight-knit communities (often family members or their children), they do not benefit from pooling resources together with other waste collectors, generally do not use common modes of transport which could lead to a reduction in costs and time spent collecting, and must negotiate and strike deals with companies as a single voice, thereby losing the benefits that a larger, more organised group or structure would bring.

In this report, we have aimed at giving an overall picture of the formal and informal waste management sectors in Kosovo, while briefly analysing the legal framework and offering some ideas on potential actions that can improve working conditions for existing informal waste collectors, enhance their skills and access to resources, and organize the sector around a formal structure that would both be the voice of the informal waste collection sector, and acts as a platform for the sector—and particularly its most vulnerable part, the individuals engaged in waste collection—to discuss and hopefully solve common

issues and problems faced by the sector as a whole. These actions do not necessarily provide a ready-made solution which will solve the issue of poverty leading to waste collection, but do, nevertheless, provide a solid starting point which, when combined, will undoubtedly improve the existing precarious situation.

Taking into account the findings and information presented in this report, and keeping in mind that the ultimate goal of ECMI Kosovo's project is, as the name implies*, Increasing Employment of Roma, Ashkali, and Egyptian Communities through a Recycling Initiative*, we believe that the best way forward is to establish a formal structure which would, among others: organise informal waste collectors under a common roof, provide a single address and entity through which to raise their concerns with a common voice, provide assistance in collection and transportation, as well as an attempt to negotiate better terms with existing recycling companies. A formal structure, be it an Association, Social Enterprise, NGO, or any other structure, established to the benefit of the Roma, Ashkali, and Egyptian communities engaged in recycling would also provide for ownership of the social enterprise by aforementioned communities, enhancing the ability of the structure to function and deliver results benefitting the community. A sense of ownership by the communities involved is important in overcoming challenges that the structure might face, including, but not limited to, lack of awareness and information on the purpose of the structure, a hesitance to cooperate for fear of losing social benefits through the formalisation of their informal work,[73] and other obstacles that might come up in its work.

In doing so, and in laying the groundwork for an effective and long-lasting improvement in the self-employment of Roma, Ashkali, and Egyptian community members in Kosovo, ECMI Kosovo intends to benefit from the experience and best-practices of its partners and other stakeholders engaged in similar projects in Kosovo.[74] ECMI Kosovo has established contacts with several private operations and companies engaged in informal waste collection, and has agreed with them to look into specific and concrete steps to be taken that would be mutually beneficial to the beneficiaries of the project and the companies involved, thereby helping create market linkages between individual waste collectors and private companies. These linkages will give rise to new relations between individuals and companies in the informal waste collection sector, thereby increasing incomes and reducing poverty.

Ultimately, a formal structure will provide the necessary framework and organisation that will: organise and coordinate the work of disparate informal waste collectors in the five (5) target municipalities;

[73] Such fears were directly expressed to ECMI Kosovo during meetings with communities and their representatives.
[74] Consultations have taken place with several stakeholders and there are initial agreements to cooperate in various areas, including in the establishment of the social enterprise and in increasing employment.

engage in economic activities that are hitherto unavailable to informal waste collectors and shield them from possible risks; invest any profits back in the community by hiring waste collectors (thus increasing employment); and also invest in trainings, workshops, and other activities aimed at improving their working conditions, as well as increase their knowledge of the labour market.

For these reasons, ECMI Kosovo will assist, within the means of the project it is implementing and as financed by the EU, individual waste collectors from the Roma, Ashkali, and Egyptian communities currently engaged in informal waste collection in the five (5) target municipalities to organise their work in a structured, coherent and beneficial manner to their economies and general well-being.

7. ANNEXES

RELEVANT LEGISLATION, DOCUMENTS AND POLICY FRAMEWORK

1. Law on Waste No.04/L-060

http://www.kuvendikosoves.org/common/docs/ligjet/Law%20on%20Waste.pdf

2. Law on Local Self Government No.03/L-040

http://www.assembly-kosova.org/common/docs/ligjet/2008_03-L040_en.pdf

3. Law on Environmental Protection No.03/L-025

http://www.kuvendikosoves.org/common/docs/ligjet/2009_03-L-025_en.pdf

4. Law on Waters No. 04/L-147

http://www.kuvendikosoves.org/common/docs/ligjet/2004_24_en.pdf

5. European Parliament and Council Directive 94/62/EC of 20 December 1994 on packaging and packaging waste

http://europa.eu/legislation_summaries/environment/waste_management/l21207_en.htm

6. Strategy of the Republic of Kosovo on Waste Management

http://www.kryeministri-ks.net/repository/docs/STRATEGY_OF_THE_REPUBLIC_OF_KOSOVO__on_WASTE_MANAGEMENT.pdf

7. Plan of the Republic of Kosovo on Waste Management

http://mmph.rks-gov.net/repository/docs/+PRKMM_Ang_701821.pdf

8. Guidelines for Good Practices on Setting up Social Enterprises for Roma Communities

http://www.undp.ro/libraries/projects/Ghid_UNDP_EN.pdf

9. Questionnaire “Increasing Employment of Roma, Ashkali, and Egyptian Communities Through a Recycling Collective”

10. Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and Their Disposal

http://www.basel.int/Portals/4/Basel%20Convention/docs/text/BaselConventionText-e.pdf

Questionnaire

"Increasing Employment of Roma, Ashkali, and Egyptian Communities Through a Recycling Collective"

Name: _____

Date: _____

Municipality: _____

Please provide as many details as you can

1. Are you currently engaged in collecting waste and valuables in waste containers and other receptacles in Kosovo?

2. In which municipalities do you currently collect waste and other valuables?

3. Do you collect waste and other valuables on your own or do you have a partner?

4. How many members of your family, if any, also engage in collecting waste and valuables?

5. How many members of your family, if any, do you support with your work?

6. What type of waste do you generally collect (plastic, metal, paper, etc.)?

7. What equipment do you currently own and utilize in your collection of waste?

8. Where and to whom do you sell the collected goods and valuables?

9. Do you sell all goods to the same buyer, or do you have more than one buyer?

10. If yes, are your buyers divided by the goods they will buy (for example, Buyer A buys only plastic, Buyer B buys metal, etc.)?

11. Do you sell to individuals or to larger companies engaged in recycling?

12. Is there a set price for these goods or do you negotiate each and every time?

13. Do you have any formal agreement with buyers on price, duration of contract, and frequency of deliveries?

14. What is your estimated monthly income earnings from the waste/valuables collected?

15. Do you and/or your family have other sources of income?

16. Have you ever received any training on health or sanitation issues from any public institutions, non-governmental organisation, or international organisation? If yes, was the training valuable to you?

17. Have you ever received any equipment or tools from any public institution, non-governmental organisation, or international organisation?

18. If yes, what types of equipment or tools have you received and were they useful in increasing your efficiency and/or improving your day-to-day work conditions?

19. What do you consider to have been the positive side of those trainings/equipment, and what could be improved?

20. Is there anything that trainings/equipment provided have not addressed properly or have address in insufficient detail?

21. What do you consider to be an urgent and essential issue that needs to be tackled and/or improved in your working conditions? In what way could a non-governmental organisation help you in improving your health, sanitation, and/or, your working conditions?

22. Are you in need of specific tools, equipment or training that would improve your working conditions?

23. Are you interested in participating in a project, funded by the European Union Office in Kosovo, and implemented by the European Centre for Minority Issues in Kosovo designed to improve your skills, health and sanitation, as well as improve your employability and increase your employment prospects in the market?

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