



GLOBAL
INITIATIVE
AGAINST TRANSNATIONAL
ORGANIZED CRIME

UNVEILING GREEN CRIMES

ENVIRONMENTAL CRIME
IN THE WESTERN BALKANS

Anesa Agović
DECEMBER 2025

ACKNOWLEDGMENTS

This research report is an output of the Global Initiative Against Transnational Organized Crime (GI-TOC)'s Observatory of Illicit Economies in South Eastern Europe. This report was produced with the financial support of the UK's Conflict, Stability and Security Fund. Its contents are the sole responsibility of the GI-TOC and do not necessarily reflect the views of the United Kingdom.

The author would like to thank civil society partners for their contributions to the research, especially the Citizens Channel in Albania, Global Analitika in Bosnia and Herzegovina, Forum for Civic Initiatives in Kosovo, LUPA in Montenegro, MEDIUM in North Macedonia and Pokret Tvrđava in Serbia.

Thanks also to Simone Haysom for offering constructive guidelines in shaping this report. Special thanks to the members of the Observatory of Illicit Economies in South Eastern Europe for reviewing the report, as well as to the GI-TOC's Publications and Communications teams for their support.

ABOUT THE AUTHOR

Anesa Agović, a field coordinator for Bosnia and Herzegovina at the GI-TOC, is a committed researcher and journalist, with over 12 years of experience in civil society and media. Her work centres on enhancing society's resilience to crime and corruption, with a strong focus on investigating illicit financial flows and environmental crime.

© 2025 Global Initiative Against Transnational Organized Crime.
All rights reserved.

No part of this publication may be reproduced or transmitted in any form or by any means without permission in writing from the Global Initiative.

Cover: © Elvis Barukcic/AFP via Getty Images

Please direct inquiries to:
The Global Initiative Against Transnational Organized Crime
Avenue de France 23
Geneva, CH-1202
Switzerland
www.globalinitiative.net

CONTENTS

Executive summary	3
Methodology	4
Key points.....	5
Environmental crime exposed	6
Spotlight on environmental crime in the Western Balkans.....	9
Pollution.....	10
Wildlife trafficking.....	14
Fishery crimes	15
Forestry crimes.....	16
Tackling environmental crime.....	18
Responses across sectors.....	24
Mapping a way forward.....	28
Recommendations	28
Notes	30



EXECUTIVE SUMMARY

As the third-largest criminal activity in the world and comprising some of the most lucrative illicit economies, environmental crime is an issue that transcends national borders, and its precise impacts are difficult to determine.¹ The universally accepted definition of environmental crime encompasses all illegal activities that directly harm the environment, including pollution, wildlife trafficking, illegal logging and illegal fishing.² While environmental crime, by definition, poses a threat to our natural environment, it also has consequences for human health. For example, in Serbia alone, an average of 6 592 people die prematurely each year as a result of ambient air pollution, making it the seventh leading cause of death in the country.³ On a global scale, environmental crime is having an increasingly deleterious impact, growing at a rate of 5%–7% per year and causing annual losses of US\$110–US\$281 billion.⁴ Despite being as profitable as illegal drug trafficking, it is more difficult to detect, prosecute and punish, making it particularly attractive to organized crime groups seeking lower sanctions and higher profits.

All major forms of environmental crime are present in the Western Balkans, from illegal logging in Kosovo and Bosnia and Herzegovina and pollution in Albania and Serbia, to the smuggling of endangered species in Montenegro and illegal poaching in North Macedonia.⁵ Environmental crime in the Western Balkans is driven by a number of notable factors, the most evident of which is limited public awareness. Added to this is the low institutional capacity and weak rule of law in the region. Some types of environmental crime also leave few or no traces, are easily concealed, or are deliberately covered up (for example, by arson). This makes it difficult to bring cases to court, and the small number of reported cases shows that there is insufficient evidence gathering and, above all, inadequate investigation. For example, in Bosnia and Herzegovina, 1 939 days after the citizens' association Eko Forum Zenica filed a criminal complaint against a steelworks plant for causing air pollution in the city of Zenica, the chief prosecutor's office suspended the investigation.⁶ Eko Forum reported that the prosecutor's office had reasoned that the parties involved had made efforts to address the complex environmental issues and that there was no deliberate wrongdoing.⁷ It is therefore necessary to strengthen the entire chain of investigation and prosecution, which is one of the areas that measures taken to combat environmental crime should address.

Although the Western Balkans 6 (hereafter 'WB6') countries – namely, Albania, Bosnia and Herzegovina, Kosovo, North Macedonia, Montenegro and Serbia – have legal frameworks in place to protect against environmental crime, experts interviewed for this research report noted that political corruption



FIGURE 1 Types of environmental crime identified in the Western Balkans.

prevents court proceedings from taking place and satisfactory verdicts from being reached.⁸ Indeed, the number of proceedings initiated by prosecutors for crimes against the environment would lead one to believe that the Western Balkans is an ecological haven of clean air, unpolluted rivers and well-preserved forests. In 2021, for example, there were relatively few environmental crime indictments: 80 in Albania, 256 in Bosnia and Herzegovina, 471 in Kosovo, 166 in Montenegro, 113 in North Macedonia and only 13 in Serbia.⁹ While comprehensive data on the total number of environmental crimes committed is difficult to obtain, these figures appear disproportionately low. Interviewees, including crime investigators, environmental activists and legal professionals, consistently emphasized that the number of indictments does not reflect the actual scale of environmental harm or the volume of reported offences.¹⁰ In Bosnia and Herzegovina, for example, available data indicates a very limited number of convictions for environmental crimes, highlighting a significant enforcement gap. In all WB6 countries, information regarding investigations, indictments and court proceedings is often fragmented, not publicly available unless requested and not kept updated.

The Western Balkan countries have also made limited progress in further aligning their policies and legislation with the European Union acquis – the set of common laws, rights and obligations to which member states are bound – in areas such as water management, chemicals and environmental crime.¹¹ This alignment is particularly important given that all six countries are either candidates or potential candidates for EU membership, as compliance with environmental standards is a key part of the accession process.

Methodology

In 2022 and 2023, six civil society organizations, one from each of the WB6, contributed to the Global Initiative Against Transnational Organized Crime (GI-TOC)'s first regional research project on environmental crime in South Eastern Europe.¹² The initiative aimed to build local capacity to better understand and address environmental crime as a form of organized crime. It was also intended to support greater resilience, understood – as defined in the Global Organized Crime Index – as the ability of societies and institutions to prevent, disrupt and recover from the harms caused by organized crime.¹³

These six organizations collected data and conducted 110 interviews with other civil society organizations, media, academia, local government departments, the private sector, law enforcement agencies, anti-corruption units, and international and regional organizations to identify trends, manifestations and community responses to environmental crime. Roughly 35% of interviewees in the region were exposed to vulnerable groups and victims whose experiences were documented with the GI-TOC's commitment to protecting their identities. Each of the participating civil society organizations contributed a national study that analyzed domestic legislation, enforcement practices and the practical challenges of combating environmental crime. These reports represent some of the earliest comprehensive assessments of environmental crime in their respective countries and aim to support local advocacy and policy reform efforts.

In addition to this analysis, each organization presented a set of recommendations that propose solutions to prevent environmental crime and mitigate its harmful consequences. These recommendations address policy reforms, enforcement strategies and community engagement initiatives, providing a multifaceted approach to combat environmental crime effectively.

Key points

- Environmental crime is widespread in the WB6, with Serbia experiencing some of the highest levels of air pollution in the world. River pollution is prevalent in Albania, Kosovo, and Bosnia and Herzegovina; illegal logging in Bosnia and Herzegovina, Montenegro and Kosovo; and wildlife trafficking in Montenegro.
- Despite improved regulations, environmental crime enforcement in the Western Balkans faces significant challenges, requiring multi-sector collaboration and clear distinction between administrative and criminal offences.
- Civil society representatives, journalists and activists are leading the fight against environmental crime and are crucial in raising awareness, reporting violations and pushing for policy changes, but they need more support, funding and resources.
- Citizens often fear reporting environmental crimes, especially when the offenders are powerful entities, highlighting the need for strengthening trust between citizens and authorities. Public awareness about environmental crimes and reporting procedures also remains low, necessitating comprehensive awareness campaigns.
- Prosecutors' offices and the police tend to deprioritize environmental crime investigations, often pursuing lighter sentences for offenders.
- Tackling environmental crime requires strong international cooperation and a multi-stakeholder approach, as promoted by the EU's Lisbon Treaty.¹⁴

The Drina River in Bosnia and Herzegovina has become heavily polluted due to poor waste management practices in the country and neighbouring Serbia and Montenegro.

© Samir Jordamovic/Anadolu via Getty Images





ENVIRONMENTAL CRIME EXPOSED

Environmental crime ranks among the most lucrative transnational criminal activities, generating an estimated US\$110–US\$281 billion annually. It includes offences such as illegal logging, wildlife trafficking, unregulated fishing and hazardous waste dumping.¹⁵ The Financial Action Task Force (FATF) classifies environmental crimes as predicate offences for money laundering and calls on both public and private sectors to improve the detection of financial flows stemming from such activities.¹⁶

Environmental crime is widely acknowledged to be the fourth largest form of criminal activity globally.¹⁷ While it is commonly viewed as an illicit economy relegated to the Global South, the wealthier countries of Europe are also significantly affected. Indeed, for the period 2018–2021, joint efforts by law enforcement agencies in the EU resulted in seizures totalling €8.3 million and 829 people arrested in member states in connection with environmental crime.¹⁸ The EU has prioritized environmental crime in the fight against organized crime, focusing on disrupting criminal networks involved in waste and wildlife trafficking. This includes targeting individuals and networks capable of infiltrating legitimate businesses or setting up their own companies to facilitate these crimes.¹⁹

In April 2024, the EU updated its Environmental Crime Directive, which aims to protect and preserve biodiversity and ecosystems, reduce pollution and improve waste management.²⁰ Given the historically low prosecution rates for environmental crimes in the EU, the updated directive not only introduces new types of environmental offences but also provides for more severe penalties to strengthen the fight against such crimes.²¹ It also empowers civil society and NGOs to bring civil actions in relation to these offences.²² This development is particularly relevant to the Western Balkans, as it aligns with the EU's Green Agenda for the region, signed in 2020, which emphasizes the need to build institutional capacity for environmental monitoring and enforcement. The directive sets a clear benchmark for candidate countries, reinforcing the Green Agenda's goal of strengthening administrative and legal mechanisms to combat environmental crime.²³

As part of their aspirations to join the EU, the countries of the Western Balkans must comply with EU standards on environmental protection and conservation, yet their scores for environmental criminal markets, as measured by the Global Organized Crime Index, are consistently higher than the European average.²⁴ The Index assesses the level of organized crime in 193 countries and their resilience to criminal threats, including environmental crimes related to flora (illegal trade and possession of protected plant species), fauna (poaching and trade of protected animal species) and non-renewable resources (illegal



Serbia has some of the highest levels of air pollution in the world. The situation is particularly severe for communities living near industrial and mining operations, as pictured here in the city of Smederevo. Photo: Pokret Tvdava

extraction and trade of natural resources such as oil, gold and precious metals). The Index examines these crimes under the Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) and relevant national laws. According to the Index, fauna crime levels in the Western Balkans are higher than the European average but lower than the global average, while flora and non-renewable resource crimes are higher than both European and global averages (see Figure 2).

Compared to other criminal markets in the Western Balkans (such as the illicit drug trade, human trafficking and firearms trafficking), environmental crimes appear to have a lower prevalence in the region. However, law enforcement agencies often treat environmental crimes as a low priority compared to other offences, typically imposing minor penalties such as fines, which means that this may not reflect the true scope of the problem. The issue is compounded by inadequate media and civil society coverage, which tends to be inconsistent and focused on isolated incidents rather than providing comprehensive analysis. This sporadic reporting, combined with insufficient investigation, makes it difficult to understand the full extent of environmental crime in the region or to effectively identify illegal activities and their perpetrators.

Country	Fauna crimes	Flora crimes	Non-renewable resource crimes
Albania	3.50	4.00	5.00
Bosnia and Herzegovina	3.50	5.00	4.00
Kosovo	2.50	4.00	4.00
Montenegro	5.00	3.00	3.50
North Macedonia	3.00	4.00	3.50
Serbia	5.00	5.00	5.00
Western Balkan average	3.75	4.17	4.17
European average	3.39	3.00	3.34
Global average	4.90	4.02	4.76

FIGURE 2 Prevalence of environmental criminal markets in the Western Balkan countries.

NOTE: Scores are out of 10, with 10 being the highest level of criminality.

SOURCE: GI-TOC, Global Organized Crime Index 2025

Women in the fight for the future

In the Western Balkans, women are emerging as leading voices in environmental protection. Their activism has gained international attention, including support from Oscar-winning actor Leonardo DiCaprio, whose foundation backed an initiative to protect the rivers of Bosnia and Herzegovina and the wider region.²⁵ On Earth Day in 2023, DiCaprio recognized activists from Bosnia and Herzegovina as one of seven prominent groups from around the world who have fearlessly fought for the protection of the environment, particularly against the construction of hydropower plants, which poses significant environmental risks.²⁶ He specifically acknowledged the work of Lejla Kusturica, leader of the Foundation Atelier for Community Transformation in Bosnia and Herzegovina, as an inspiration for environmental activists worldwide.²⁷ Kusturica led the NGO in lobbying the federal government to ban future construction of power plants.²⁸

A significant victory for environmental activists came in July 2022, when thousands of women united across Bosnia and Herzegovina to campaign against the construction of hydropower plants in the Federation of Bosnia and Herzegovina (BiH). After sustained protests, including physical blockades, legal challenges, political advocacy and media campaigns, the activists managed to put a stop to the construction. However, with only 3% of Bosnia and Herzegovina's territory currently protected, the fight continues to preserve other threatened natural resources, including the country's ancient forests.

One of the most notable examples of successful activism occurred at the Kruščica River, where local women occupied a bridge for over 500 days and nights to prevent the construction of a hydropower plant. Despite facing police violence and harsh winter conditions, the women persisted and ultimately prevailed, later earning multiple awards for their dedication.²⁹ The women had earlier presented their cause at the European Parliament, advocating against hydropower plant construction to guard against river pollution.³⁰ In Albania, the campaign to protect the Valbona River, often described as the country's 'mystical heart', attracted support from local singers and artists, who joined the effort to prevent hydropower development in Valbona Valley National Park.³¹

The latest environmental struggle has emerged in Serbia, where Chinese investment has brought new challenges. Since January 2024, women from the village of Krivelj, in eastern Serbia, have been holding regular protests against a Chinese state-owned company that, according to SeeNews, has invested US\$2.5 billion into Serbian copper mines over five years.³² The women are demanding that the mining company relocate their village due to the environmental impact of open-pit copper mining, citing concerns about land and water contamination.³³

Women's activism across the Western Balkans demonstrates how grassroots movements can effectively challenge environmental threats and strengthen regional resilience. These groups' commitment to preserving natural resources for future generations continues to inspire environmental protection efforts throughout the region. ■



In the Bosnian town of Kruščica, women protested for 500 days against the construction of a hydropower plant. Women activists are emerging as leading voices in environmental protection in the region. Photo: Screengrab from Rewild, The Brave Women of Kruščica, YouTube



SPOTLIGHT ON ENVIRONMENTAL CRIME IN THE WESTERN BALKANS

According to fieldwork conducted for this research, law enforcement agencies typically devote less attention to environmental crimes compared to other criminal activities. Europol has identified seven criminal networks in Europe that specialize exclusively in environmental criminal markets: four focus on waste and pollution crimes and three on wildlife crimes. Beyond this, an additional 12 criminal networks were found to engage in environmental crimes as part of their broader portfolio, frequently combining these with drug trafficking.³⁴

Italian criminal organizations, particularly mafia-style groups, dominate the waste and pollution crimes landscape. These organizations have established operations primarily in Italy, the Netherlands and Spain.³⁵ Investigation findings reveal that criminal networks often employ similar smuggling routes for multiple illegal activities, moving wildlife, humans, firearms and drugs along the same paths.³⁶

Understanding the different types of environmental crimes is essential for comprehending the prevalence of these crimes in the Western Balkan region. In a 2021 report, the Organization for Security and Co-operation in Europe (OSCE) identified several hotspots of environmental crime in the Western Balkans, including illegal waste dumping, fishing and logging.³⁷ In Serbia, for example, the Bor and Kolubara regions suffer from industrial pollution linked to mining, while illegal logging is widespread primarily due to weak enforcement. In North Macedonia, areas around Skopje and Tetovo face severe air pollution and illegal waste dumping. In Bosnia and Herzegovina, the Una-Sana canton and parts of the Republic of Srpska are affected by illegal deforestation and poor waste management. Meanwhile, Skadar Lake in Montenegro is under pressure from unregulated tourism, illegal construction and ecosystem degradation related to infrastructure projects such as the Bar–Boljare highway.³⁸



The construction of a highway between Bar in Montenegro and Boljare in Serbia degraded the ecosystem of Skadar Lake, one of Europe's largest freshwater reserves. © Savo Prelevic/AFP via Getty Images

Research by the GI-TOC has also documented a range of environmental crimes across the WB6, including waste trafficking in Drvar and Bosansko Grahovo (Bosnia and Herzegovina), illegal logging in Jahorina and Bjelašnica (also in Bosnia and Herzegovina), and severe air and water pollution in Bor and Smederevo (Serbia). In North Macedonia, Lake Ohrid faces threats from fish poaching and regulatory capture, while Skadar Lake in Montenegro remains a hotspot for illegal construction and poaching. The GI-TOC's research focuses specifically on criminal markets and illicit activities, and analyzes criminal dynamics and actors that may not appear in climate policy assessments, providing a complementary but more targeted perspective on the region's environmental vulnerabilities.

Pollution

In the Western Balkans, pollution stands out as one of the most visible and pervasive forms of environmental crime, frequently reported by local communities and documented across multiple countries. These threats range from illegal waste dumping that contaminates rivers and drinking water to industrial emissions that degrade air quality. Pollution in the region can be broadly categorized into two types: widespread pollution (e.g. air pollution) that affects the broader population; and localized contamination from specific illicit activities, such as illegal dumpsites.³⁹ The Western Balkans is rich in natural resources but heavily burdened by pollution hotspots, a result of rapid industrialization, weak environmental enforcement and regulatory gaps. As a result, the region faces some of Europe's most urgent pollution challenges.

Waste crimes

Illegal waste management, or waste crimes, involves the improper collection, transportation, recovery or disposal of waste.⁴⁰ Globally, billions of tonnes of solid waste are improperly managed each year, with more than 40% either uncollected or handled in uncontrolled facilities, including open

umpsites.⁴¹ The waste management sector is vulnerable to criminal exploitation due to its scale, and the high costs and complex regulations involved in waste disposal. Criminal groups, often colluding with corrupt officials, smuggle and illegally dispose of waste, causing harm to vulnerable ecosystems.⁴²

Although the Europol report does not explicitly state whether identified criminal networks in environmental crime originate from the Western Balkans, Serbian nationals have been found to be involved in the illegal dumping of waste from Italy in Bosnia and Herzegovina.⁴³ Between July 2020 and March 2021, journalist Milkica Milojević investigated a case involving the illegal import of 414 tonnes of textile waste from Italy to Bosnia and Herzegovina.⁴⁴ The waste was illegally dumped in several municipalities, including Drvar and Bosansko Grahovo.⁴⁵ It was later revealed that the waste had been imported from Italy by a phantom company founded by three Serbian citizens.⁴⁶ Public attention to the problem intensified after residents of Drvar organized road blockades to stop trucks carrying imported waste, refusing to allow further disposal in their community. These sustained protests compelled the authorities to act, ultimately resulting in the removal of hundreds of tonnes of textile waste, demonstrating how citizen mobilization played a decisive role in confronting the illegal shipment.⁴⁷ Klix reported that despite having the necessary permits, the company lacked waste recycling facilities and the authorities had issued the permits without due diligence.⁴⁸

As a result of stronger enforcement against illegal waste management within Italy, Italian criminal networks have exploited opportunities to profit elsewhere by sending waste outside of the country.⁴⁹ A similar case involving tonnes of Italian waste dumped illegally was reported in Bulgaria in 2020, during a major operation by Italian law enforcement to dismantle a network of traffickers involved in the activity.⁵⁰ In this instance, a member of the criminal network had previously been imprisoned for collaborating with the 'Ndrangheta, the influential Calabrian mafia.⁵¹ In February of that year, in separate incidents, Italian police seized over 25 tonnes of electrical waste at the Italian port of Ancona, intended to be shipped to Albania, and intercepted another attempt to transport waste to Albania by truck later that month.⁵² Waste crimes linked to Italy occur in the Balkans due to the region's geographic location, widespread corruption and profit potential.



Illegal waste management is widespread across the Western Balkans, with open disposal sites a prevalent and ongoing problem in the Kosovan capital of Pristina. © Ermal Meta/AFP via Getty Images

Air pollution

The Western Balkans face severe air pollution, particularly during the winter months, with the region's capitals frequently ranking among Europe's most polluted cities, and sometimes among the world's top 10.⁵³ The situation is especially dire in Serbia, where, according to a study by the World Health Organization, air pollution is responsible for roughly 6 592 premature deaths annually.⁵⁴ In 2019, Serbia recorded 175 pollution-related deaths per 100 000 people, the highest rate in Europe and the ninth-highest globally, surpassing even India.⁵⁵ North Macedonia, Kosovo and Montenegro are also badly affected within the region.

The impact is particularly severe in communities living near industrial and mining operations. In the Serbian city of Požarevac, for example, activist and lawyer Marija Simić Lazarević led opposition to a hazardous waste incinerator in 2018, organizing petitions and filing criminal charges.⁵⁶ According to Simić Lazarević, she and other activists were persecuted and intimidated in response.⁵⁷

The situation is similarly problematic in mining towns such as Majdanpek and Bor.⁵⁸ Various media outlets and official reports have highlighted rising pollution levels in the air and water in Majdanpek, which are adversely affecting the health of local residents and the environment.⁵⁹ The mining operations have even diverted the flow of an important river, leading to disastrous effects on the irrigation of surrounding farmland.⁶⁰ In Bor, air quality measurements have revealed dangerously high levels of toxic metals, including arsenic and cadmium, alongside the presence of other harmful substances such as lead and mercury.⁶¹ A study by the Serbian Institute of Public Health revealed that these conditions have reduced life expectancy in Bor by 10 years, with significantly higher rates of cancer observed.⁶² In a related case, Milenko Jovanovic, an air pollution expert, was dismissed from Serbia's Environmental Protection Agency (SEPA) allegedly after reporting dangerous levels of sulphur dioxide and arsenic in Bor's air, according to an article in *The New York Times*.⁶³ This case is reflective of a broader pattern of weak institutional response to environmental violations. For example, Euronews reported that SEPA has been criticized for raising air pollution thresholds to make hazardous levels appear acceptable.⁶⁴

The European Commission's 2023 report on North Macedonia highlights air pollution as a significant problem in larger urban centres. The country is noted as having made minimal progress on air quality monitoring, with no legislative measures implemented during the reporting period.⁶⁵ Most concerning is the situation in Skopje, where three districts rank among Europe's most polluted areas, showing high levels of fine particulate matter. These microscopic particles pose significant health risks, as they can penetrate the lungs and enter the bloodstream, potentially causing organ damage.⁶⁶

Air pollution is also severe in Kosovo, where it claims approximately 760 lives annually and has an estimated economic impact exceeding €240 million.⁶⁷ The pollution primarily stems from coal power plants, road transport, urban waste dumps, household emissions and industrial operations.⁶⁸ According to a report by the European Commission, the Kosovo B power station, on the outskirts of Pristina, is especially problematic, with dust emissions reaching up to 15 times higher than permitted levels.⁶⁹

The health impact across Kosovo is substantial. In the region of Pristina, authorities recorded 167 550 cases of respiratory disease and 54 784 cases of cardiovascular disease in 2019.⁷⁰ Fushë Kosovë registered 29 522 cases of respiratory disease and 20 331 cases of cardiovascular disease in the same year. The regions of Obiliq and Drenas have reported similarly high rates of respiratory and cardiovascular diseases, indicating the extent of pollution-related health issues in Kosovo.⁷¹



Over 750 lives are lost to air pollution in Kosovo every year, largely due to emissions from power stations. © Thomas Trutschel/Photothek via Getty Images

Montenegro's significant air pollution challenges stem particularly from industrial emissions and the transport sector, with negative impacts on public health including respiratory and cardiovascular diseases. The situation is exacerbated by inadequate monitoring systems and weak enforcement of environmental regulations.⁷² The severity of the problem is illustrated by a 2024 legal case, where a resident of Pljevlja, one of Montenegro's most polluted cities, filed a lawsuit against the state. The lawsuit alleged that the government's failure to address air pollution violates the citizens' right to a healthy environment.⁷³ In February 2025, the Basic Court in Podgorica ruled in favour of the resident, determining that the state is responsible for the air pollution in Pljevlja and had violated citizens' constitutional right to a healthy environment. The court ordered the state to compensate the resident for non-pecuniary damages.⁷⁴

Water pollution

Water pollution in the Western Balkans is a significant environmental and public health concern, one that is exacerbated by weak institutional responses, growing industrial activity and the involvement of organized crime.

In Albania, the Ishem–Erzen river basin ranks among the most contaminated waterways in Europe, with cadmium and lead concentrations exceeding EU standards by more than 100 times.⁷⁵ The two rivers, Ishem and Erzen, which flow through densely populated areas, are heavily polluted with industrial waste, agricultural run-off and plastic debris.⁷⁶ In 2022, a media report noted that despite an investment of over €112 million in wastewater treatment facilities, only 10% of Albanian citizens benefit from these services, leaving the majority exposed to ongoing water pollution.⁷⁷ The report noted that this gap is largely due to the fact that most treatment plants are concentrated in a few urban centres, while many rural and peri-urban areas remain unconnected to the sewerage network. Even in areas where facilities exist, some are non-functional or underused, resulting in untreated wastewater continuing to be discharged into rivers and the sea.⁷⁸

Kosovo faces similar challenges with water treatment infrastructure. The country operates just three small wastewater treatment plants across 38 municipalities, serving only 50 000 people. Consequently, over 1.7 million residents rely on rivers that have become heavily contaminated with untreated sewage, with implications for irrigation practices, agriculture and recreation in addition to reducing biodiversity.⁷⁹ The Pristina River, for example, has become severely degraded to the extent that it is now said to resemble a sewer more than a natural waterway.⁸⁰ Despite some governmental efforts to tackle the problem, environmental experts warn that Kosovo's river pollution could trigger international disputes, as contaminated waters flow into neighbouring countries.

In Bosnia and Herzegovina, the Drina River – which flows from Montenegro, through Bosnia and Herzegovina, and into Serbia – also faces severe pollution challenges. A barrier installed at the Višegrad hydroelectric plant, located downstream from many of the illegal dump sites, captures large amounts of floating debris, including plastic waste, used tires and animal carcasses.⁸¹ While this structure prevents further downstream contamination into Serbia, it also results in significant waste accumulation behind the barrier, particularly during floods when the volume of debris increases.⁸² The floating debris is a stark reminder of the region's failure to enforce basic environmental standards.⁸³

In the Serbian city of Bor, industrial activity has led to significant air and water pollution.⁸⁴ Testing has revealed high levels of arsenic, cadmium, lead and other heavy metals in local water sources, correlating with increased cancer rates and reduced life expectancy among residents.⁸⁵ Despite public protests and formal complaints filed by the City of Bor with environmental authorities, including a 2020 criminal complaint against a Chinese-owned mining company for excessive air pollution, local activists note that official responses have remained inadequate, contributing to a growing public health crisis.⁸⁶

Wildlife trafficking

Wildlife trafficking remains a significant issue within the Western Balkans, with common offences including illegal killing of protected species, use of poisoned baits, and trafficking of birds such as goldfinches and birds of prey. In Albania and Montenegro, illegal hunting and poisoning are widespread, driven by both tradition and commercial trade. Bosnia and Herzegovina and Kosovo struggle with weak legal definitions and poor inter-agency coordination, which makes prosecution of environmental crimes challenging. North Macedonia faces issues with illegal trapping and poisoning, while in Serbia, birds of prey are frequently targeted, and enforcement is undermined by minimal penalties and limited institutional capacity. Across the region, enforcement agencies often lack training and resources, and many cases do not reach court. This highlights the urgent need for stronger legal frameworks, improved data collection, and greater public and political engagement on the issue.⁸⁷

Illegal wildlife poisoning is a widespread and serious threat to biodiversity in the Western Balkans, yet it remains largely unpunished. In Albania, for example, it was not even legally recognized as a crime until 2019. Across the region, enforcement is alarmingly weak – only about 1% of reported poisoning cases reach court, revealing major gaps in legal accountability and institutional response.⁸⁸

In Bosnia and Herzegovina, illegal songbird hunting has seen a notable increase in recent years, fuelled by the involvement of organized crime groups from Italy and the rising number of Italian nationals engaging in hunting tourism.⁸⁹ As reported by local media, including eTrafika, many of these individuals present themselves as tourists but are in fact involved in illegal poaching activities, particularly targeting finch species such as goldfinches.⁹⁰ This trend mirrors a broader pattern observed in Mediterranean countries such as Italy and Croatia, where songbird hunting also has deep cultural roots. The growing demand has placed increasing pressure on local bird populations, positioning Bosnia and Herzegovina as both a source and hotspot for illegal bird hunting and trade.⁹¹

Montenegro's wildlife trafficking challenges gained international attention in 2022 when a lion cub escaped in the coastal town of Budva, exposing the risks posed by illegal exotic animal ownership – both to public safety and to the welfare of the animals kept in unregulated private settings.⁹² This incident exemplifies a broader pattern of wildlife crime in Montenegro, where illegal zoos housing endangered species operate with relative impunity and smuggling networks transport various species, from exotic birds to big cats. These networks extent beyond national borders, connecting local operators to international actors, including hunters from Italy and poachers from Ukraine.⁹³

A telling example of Montenegro's wildlife trafficking challenges is the Montenegrin red viper, a rare, red-coloured variant of the nose-horned viper (*Vipera ammodytes*), a venomous snake species widely distributed across Europe and highly sought after in European online marketplaces. Although this species is protected under the EU Habitats Directive (Annex IV) and the Bern Convention (Appendix II), it lacks legal protection in Montenegro, leaving it vulnerable to unregulated collection and illegal trade – this is especially true of the red variant, which is prized by collectors.⁹⁴ Despite existing legal frameworks prescribing penalties for wildlife crimes,⁹⁵ enforcement remains weak, hampered by several critical gaps.⁹⁶ These include the absence of a state facility for housing seized animals, insufficient border control mechanisms and inadequate training for law enforcement personnel. These systemic weaknesses continue to undermine efforts to combat wildlife trafficking effectively in Montenegro,⁹⁷ and the WB6 more broadly.

Fishery crimes

Illegal, unreported and unregulated (IUU) fishing causes global economic losses estimated at US\$10 billion–US\$23.5 billion annually.⁹⁸ Along with illegal logging and wildlife trade, IUU fishing contributes significantly to the degradation of terrestrial and marine ecosystems, posing a particular threat to endangered species.⁹⁹ Within the Balkans, illegal hunting and fishing are especially persistent challenges in North Macedonia. While hunting and fishing are regulated through a licensing system with designated seasons, authorities regularly apprehend poachers operating outside these legal parameters.¹⁰⁰ Concessionaires frequently misrepresent animal and fish stocks in their areas by inflating numbers beyond legal hunting and fishing quotas. This deception often involves bribing environmental inspectors and experts to produce falsified reports.

The European Commission's 2023 progress report on North Macedonia indicates that the country remains only moderately prepared to address fisheries management challenges, with no significant progress made in recent years. The report identifies critical weaknesses in the capacity of inspection services to combat illegal fishing and notes the absence of effective measures for aquaculture development and fish stock restoration. The Commission advocates for public awareness campaigns about the legal consequences of IUU fishing, particularly emphasizing the protection of vulnerable species like the European eel.¹⁰¹

The declining populations of Ohrid trout and belvica in Lake Ohrid, which straddles the border between North Macedonia and Albania, exemplify the problem of IUU fishing.¹⁰² Media reports regularly document both fish poaching and associated corruption, particularly related to Ohrid trout.¹⁰³ Lake Ohrid, which is Europe's oldest lake, faces mounting threats to its ecosystem from illegal fishing and inadequate cross-border protection measures between Albania and North Macedonia.¹⁰⁴ Bribery

The declining population of Ohrid trout in Lake Ohrid, which lies on the border between North Macedonia and Albania, underlines the threat posed by illegal fishing. © Adnan Beci / AFP via Getty Images



and corruption are widespread, with agreements often made to ensure authorities are absent during poaching activities. In exchange for favours or cooperation, corrupt officials often accept bribes in the form of large quantities of fish.¹⁰⁵

Similar challenges exist in Serbia's Smederevo region, where illegal fishing is widespread, particularly along the Danube River. The region has witnessed severe impacts on protected fish, such as sterlet. In a notable case, two people were arrested after being found with 117 specimens of sterlet that they caught illegally in the vicinity of Smederevo, leading to a criminal complaint being filed against them for illegal fishing.¹⁰⁶

Forestry crimes

Environmental experts have expressed concern about the forests of the Western Balkans, where illegal logging is reaching unprecedented levels due to the soaring demand for timber.¹⁰⁷ In Kosovo, for example, illegal logging stands out as one of the most prominent environmental crimes. It takes various forms, including unauthorized logging in public forests, exploitation of protected areas, mis-reporting of volumes of harvested wood and unlawful logging in private forests, and it intersects with smuggling and fraudulent accounting practices.¹⁰⁸ The situation has worsened recently, with official data showing that while Kosovo permits the harvesting of 1.2 million cubic meters of timber, only 7% of logging operations comply with legal requirements.¹⁰⁹ A major obstacle to forest protection is the poor coordination between forestry institutions and law enforcement agencies, including the police and the judiciary.¹¹⁰ The environmental impact is severe, with Kosovo losing over 700 hectares of forest annually to illegal logging and wildfires.¹¹¹

To counter deforestation in Kosovo, innovative drone technology is being used to disperse seeds. This method proves five times more efficient at reforesting areas than manual planting, covering 1 hectare in just two hours and reaching remote areas more effectively.¹¹² The European Commission's 2023 report for Kosovo acknowledges the country's progress in forestry planning and management through the adoption of new secondary legislation. However, it also notes that its forest strategy and forestry law have yet to be adopted, while deforestation and illegal logging continue to be of serious concern.¹¹³



Illegal logging in the mountains of Jahorina, Visočica and Bjelašnica, pictured here, is reportedly linked to unauthorized construction and money laundering. Photo: GI-TOC

The problem of illegal logging extends to neighbouring countries, including Montenegro and Bosnia and Herzegovina. In Montenegro, it is the most prevalent form of environmental crime, causing financial losses of as much as €20 billion through concession management of forests.¹¹⁴ Bosnia and Herzegovina faces a more complex situation, where illegal logging operations have shifted to remote areas and often involve the complicity of corrupt local authorities and inspectors. A notable pattern has emerged in the mountains of Jahorina, Bjelašnica and Visočica, where illegal logging activities intensify on weekends, especially on Sundays.¹¹⁵ According to interviewees, the activity is directly linked to unauthorized construction in these mountainous areas, as well as to money laundering through construction.¹¹⁶ Criminal groups obtain construction permits using funds from drug trafficking and use illegally harvested timber for building projects.¹¹⁷ In 2018, the Republic of Srpska, one of the two entities within Bosnia and Herzegovina, reported illegal logging losses of approximately €1.5 million, concentrated mainly in the Jahorina area.¹¹⁸

A recent case highlights environmental governance challenges in Bosnia and Herzegovina: the owner of a private company purchased land on Jahorina mountain despite having been under investigation for excessive logging within a concession area for four years. In February 2025, the District Public Prosecutor's Office in Doboj finally filed an indictment against the individual and six others for illegal logging activities that had allegedly caused over half a million euros in damage to forests in Teslić.¹¹⁹



TACKLING ENVIRONMENTAL CRIME

As part of their EU accession ambitions, countries in the Western Balkans are expected to align their legislation with the EU Environmental Crime Directive and strengthen enforcement mechanisms accordingly. While most countries in the region have expressed strong commitments on paper to tackling environmental crime – with the exception of Kosovo, which has yet to fully adopt related legal frameworks – this commitment has not consistently translated into effective action on the ground. According to the European Commission's 2023 country reports, progress in addressing environmental crime remains limited, and efforts need to be significantly intensified. A particular challenge is overcoming the persistent perception that environmental crime is victimless, which continues to undermine enforcement and accountability.

Figure 3 provides an overview of conventions signed by countries in the Western Balkans that address environmental protection and provide the legal framework for international cooperation in combating environmental crime by setting standards and obligations for countries to follow.

INTERNATIONAL CONVENTIONS	RATIFIED AND IMPLEMENTED INTO NATIONAL LEGAL FRAMEWORK					
	ALBANIA	BOSNIA AND HERZEGOVINA	KOSOVO	MONTENEGRO	NORTH MACEDONIA	SERBIA
Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) ¹²⁰	✓	✓	✗	✓	✓	✓
Convention on Environmental Impact Assessment in a Transboundary Context (Espoo Convention)	✓	✓	✗	✓	✓	✓
Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal (Basel Convention) ¹²¹	✓	✓	✗	✓	✓	✓
Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (Aarhus Convention) ¹²²	✓	✓	✗	✓	✓	✓

INTERNATIONAL CONVENTIONS	RATIFIED AND IMPLEMENTED INTO NATIONAL LEGAL FRAMEWORK					
	ALBANIA	BOSNIA AND HERZEGOVINA	KOSOVO	MONTENEGRO	NORTH MACEDONIA	SERBIA
UN Convention against Transnational Organized Crime (UNTOC) ¹²³	✓	✓	✗	✓	✓	✓
Rio Conventions (UN Framework Convention on Climate Change, UN Convention on Biological Diversity, UN Convention to Combat Desertification) ¹²⁴	✓	✓	✗	✓	✓	✓

FIGURE 3 International conventions on environmental protection implemented into the legal framework of Western Balkan countries.

Albania

Albania's environmental legal framework originated with Law No. 7664 in 1993 but has evolved significantly since then.¹²⁵ The 1998 Constitution strengthened environmental protections by guaranteeing citizens access to environmental information and establishing the state's obligation to ensure a healthy environment.¹²⁶ The Criminal Code further supports these constitutional provisions by defining environmental crimes and their penalties in alignment with EU Directive 2008/99.¹²⁷ Additionally, Albania has ratified numerous international environmental treaties and incorporated these into its national legislation to promote sustainable development.

Despite these frameworks, the 2023 European Commission report found Albania to be only moderately prepared in environmental and climate change matters, with limited progress made towards aligning with EU policies.¹²⁸ The EU has outlined several recommendations, including the adoption of new water legislation, increased funding for national water agencies, strengthened environmental assessment procedures, and more rigorous enforcement of existing environmental laws.¹²⁹

In 2023, the OSCE conducted a baseline assessment to identify gaps in Albania's legal framework and institutional cooperation with regard to environmental crime.¹³⁰ While the Criminal Code prescribes penalties of up to three years' imprisonment for serious pollution offences, specific violations are defined by sectorial laws. Most infractions result in administrative penalties, such as fines or restoration orders, but severe offences may lead to criminal prosecution. The effectiveness of Albania's Criminal Code depends heavily on these sectorial regulations.¹³¹

As an EU candidate country, Albania is working to align its environmental legislation with EU directives. This alignment process encompasses various areas, including water and air quality, waste management, industrial pollution control and nature protection, all guided by sustainable development principles and the 'polluter pays' concept.¹³²

In terms of technological advancement, Albania launched a tool within the Digital Commissariat mobile application in 2021 to facilitate reporting of environmental crimes, including water and soil pollution, illegal dumping and noise pollution.¹³³ Although Albania has established a comprehensive legal framework for addressing environmental crime, experts note that successful implementation of these laws requires cross-sector collaboration, capacity-building for authorities, and awareness-raising among the public, media and academia. This implementation process presents a complex challenge, requiring substantial resources, expertise and coordination among diverse stakeholders.

Bosnia and Herzegovina

Environmental legislation in Bosnia and Herzegovina has made significant strides over the past decade, particularly following the ratification of the Aarhus Convention.¹³⁴ However, the country faces a fundamental challenge in the lack of a standardized definition of environmental crime. While initial environmental laws were developed with EU assistance in the early 2000s to align with European directives,¹³⁵ recent legislative updates have occurred at the entity level, with the Federation of BiH adopting the Law on Environmental Protection in February 2021 and the Republic of Srpska passing the Law on Nature Protection in June 2024.¹³⁶

The country's complex political system necessitates that environmental issues are often managed at lower levels of government, including entity, cantonal or municipal level. The Federation of BiH comprises 79 municipalities across its cantons, while the Republic of Srpska contains 63 municipalities. At the municipal level, environmental protection is administered through various departments, including communal affairs, spatial planning and inspections. While current legislation ensures the right of citizens to access environmental information from state bodies, such information is rarely requested, except by activists and civil society representatives, even in cases where citizens directly witness or are affected by environmental crimes.¹³⁷

At the national level, environmental crimes are addressed through specific provisions in the Criminal Code, including the importation of dangerous substances (Article 166), smuggling of hazardous materials that endanger public safety (Article 214) and organizing criminal associations (Article 249).¹³⁸ These violations are categorized into three groups, based on severity and method of execution: misdemeanours, economic offences and criminal acts.¹³⁹ Other environmental offences fall under entity or cantonal jurisdiction, with the Ministry of Foreign Trade and Economic Affairs overseeing the implementation of the Basel Convention and the Ministry of Security managing compliance with the UN Convention against Transnational Organized Crime.¹⁴⁰

Both entities adopted environmental strategies in 2023,¹⁴¹ with plans to enhance judicial expertise in environmental crime. However, the European Commission's 2023 report on Bosnia and Herzegovina notes the country's limited alignment with EU environmental standards, citing fragmented regulatory frameworks and inadequate enforcement capabilities. The report emphasizes the need for a national environmental protection strategy, strengthened legal frameworks, enhanced administrative capacity, stricter pollutant controls and proper implementation of the 'polluter pays' principle.¹⁴²

Although Bosnia and Herzegovina has demonstrated its commitment to various international environmental agreements through national strategies, action plans and policy frameworks – such as the Environmental Protection Strategy of the Federation of BiH and the Republic of Srpska's Environmental Strategy – it still lacks formal procedures for appointing national focal points responsible for implementing the environmental conventions to which it is a signatory party.¹⁴³

Kosovo

Kosovo has aligned its environmental legislation with EU standards, building upon the same foundational principles as European environmental legislation. This alignment is supported by the principles outlined in the Constitution, particularly in Article 52, which emphasizes prevention, responsible use of natural resources, cooperation and public access to environmental information.¹⁴⁴ Kosovo's Constitution recognizes a healthy environment as a fundamental human right and assigns responsibility for protecting nature, biodiversity and national heritage to all citizens. It also requires institutions to

play a key role in environmental protection by considering environmental impacts in their decision-making and ensure citizen participation in this process.

The country's environmental legal framework centres on three primary laws: Environmental Protection, Environmental Impact Assessment and Integrated Pollution Prevention and Control. This framework extends to specific regulations on air and water quality, protection of nature, spatial planning and national parks.¹⁴⁵ In Kosovo, environmental violations can be addressed through either administrative or criminal proceedings.¹⁴⁶ While the Criminal Code of Kosovo clearly defines offences related to environmental damage, indicating that the legal framework is well established, the lack of consistent enforcement and prosecution underscores the need for more effective implementation in practice.¹⁴⁷ The Crime Investigation Division within Kosovo Police's Investigation Department handles serious environmental crimes as part of its broader mandate, which includes interagency and international cooperation against serious crimes, anti-radicalization efforts and combating economic crimes.¹⁴⁸

Under the Law on Local Self-Government, Kosovo's central government has delegated additional environmental responsibilities to municipalities. These include managing forests within centrally authorized areas, including the granting of tree-felling licences according to government-approved guidelines.¹⁴⁹ Environmental oversight is regulated by the Law on the Inspectorate of Environment, Water, Nature, Spatial Planning and Construction, which establishes municipal environmental protection inspectorates. These bodies monitor compliance with environmental, water and nature protection laws with particular emphasis on the conservation of protected species.¹⁵⁰

Despite legislative progress, Kosovo faces significant challenges in enforcing and prosecuting environmental crimes. While international organizations such as the EU Rule of Law Mission in Kosovo (EULEX) provide valuable support in raising awareness and providing training for local authorities,¹⁵¹ serious environmental risks persist. For instance, the NATO-led Kosovo Force (KFOR) monitors some 12 sites where toxic and radioactive materials are stored, many of which are considered unsafe, and conducts monthly assessments with the security forces to reduce environmental hazards. However, Kosovo continues its efforts towards EU alignment, focusing particularly on achieving a green transition and meeting benchmarks in water quality, industrial pollution control and climate change mitigation.¹⁵²

Montenegro

Montenegro's environmental protection efforts were formally established with the 1991 Declaration on the Ecological State, which highlighted the country's commitment to preserving nature.¹⁵³ This commitment was strengthened in the 2007 Constitution, which emphasized the importance of sustainable development and environmental stewardship.¹⁵⁴ These foundational documents set the stage for a comprehensive legal framework, encompassing laws on biocidal products, chemicals, radiation safety, air protection and noise pollution. Montenegro has also developed specific strategies, including the National Sustainable Development Strategy and dedicated spatial plans for national parks and marine reserves.¹⁵⁵ This legal framework is supported by the Law on Inspection Supervision and also the Criminal Code of Montenegro, which contains numerous articles addressing crimes against the environment and crimes related to violations of spatial planning regulations,¹⁵⁶ enforced by the Police Directorate and prosecutor's offices.¹⁵⁷

Montenegro has demonstrated its commitment to global environmental standards by ratifying several international treaties. However, greater public participation and a more sustainable financial framework – including consistent state budget allocations, long-term funding mechanisms for environmental

projects, and support for local-level implementation – are necessary. While Montenegro has made progress in aligning national laws with EU environmental standards, substantial work remains for achieving a green transition, particularly regarding water quality, industrial pollution and climate change.¹⁵⁸ The effectiveness of the legal framework is undermined by provisions that are either too vague or not practically enforceable by authorities, as well as by inadequate institutional knowledge and weak implementation. Additionally, unclear legal definitions of environmental damage further complicate the prosecution of environmental offences.¹⁵⁹

Despite the Environmental Crime Directive being largely incorporated into the Criminal Code, practical implementation of environmental legislation remains challenging, particularly in prosecuting environmental crimes. The Centre for the Training of Judges conducts training programmes focused on environmental crime;¹⁶⁰ however, according to the OSCE, their impact remains limited due to inadequate institutional capacity and poor interagency coordination.¹⁶¹ While these initiatives are a step in the right direction, they have not yet led to significant improvements in the prosecution or enforcement of environmental legislation in Montenegro.¹⁶² Improving the staffing of inspection services to meet European ecological standards is essential, while effective implementation of environmental regulations requires better collaboration among relevant authorities in addition to specialized training of personnel.¹⁶³

The latest OSCE situation analysis on environmental crime in Montenegro reaffirms the need to enhance administrative and technical capacities, improve institutional cooperation with clearly defined responsibilities, and implement stricter criminal policies. It highlights inconsistencies between national legislation and international agreements, such as the CITES treaty and the EU Birds Directive, and advocates for a specialized environmental unit within the Police Directorate.¹⁶⁴

North Macedonia

North Macedonia has established a comprehensive legal framework for addressing environmental protection and criminal prosecution of environmental offences. The primary legislation is the Law on the Environment, which sets out general guidelines for environmental protection and works in conjunction with the Offences Act. This framework is supplemented by specialized laws on inspection supervision, environmental inspection, nature protection, water, ambient air quality and waste management, with additional laws on soil protection and industrial emissions control in development.¹⁶⁵



A waste dump near the cooling towers of a coal-fired power plant in North Macedonia exemplifies the intersecting environmental issues the Balkan region is grappling with. © Robert Atanasovski/AFP via Getty Images

The implementation of environmental protection involves multiple government bodies with distinct responsibilities. The Ministry of Justice ensures alignment with EU environmental directives, while the Ministry of Environment and Spatial Planning oversees environmental protection activities. Criminal prosecution of environmental crimes is handled through collaboration between the Ministry of Interior Affairs, the police, judicial authorities and the State Environmental Inspectorate, with the latter conducting inspections and initiating criminal proceedings.¹⁶⁶

North Macedonia's Criminal Code contains provisions for criminal offences against the environment and nature, which were first introduced in 1996 and have been updated several times since. The Criminal Code outlines penalties and security measures applicable to both individuals and legal entities. A significant recent development was the September 2023 amendment introducing ecocide as a criminal offence, carrying severe penalties for significant environmental damage caused intentionally or through negligence.¹⁶⁷ While the State Environmental Inspectorate views these penalties as preventative or corrective measures for everyone to bear responsibility for environmental damage,¹⁶⁸ scepticism exists about their ability to lead to meaningful change without strong measures to identify and penalize major polluters.¹⁶⁹ Local experts, including academics and civil society activists, have called for the creation of a specialized police unit to focus on ecological crimes.¹⁷⁰ In addition, strengthening inspection and prosecution capabilities through increased staffing and training is much needed.¹⁷¹ A notable gap in the current criminal justice system is its focus on perpetrators rather than victims, with no comprehensive research yet conducted on environmental crime victimization.¹⁷²

Despite two decades of efforts to align environmental legislation with EU standards, significant challenges remain in implementation. There is a gap between the legal provisions and their practical enforcement within the existing regulatory framework.¹⁷³ The 2023 European Commission report specifically notes that North Macedonia has yet to align with EU directives on environmental liability and environmental crime. Additionally, the quality and effectiveness of environmental impact assessments are compromised by the lack of specialized staff and weak institutional and administrative capacity.¹⁷⁴

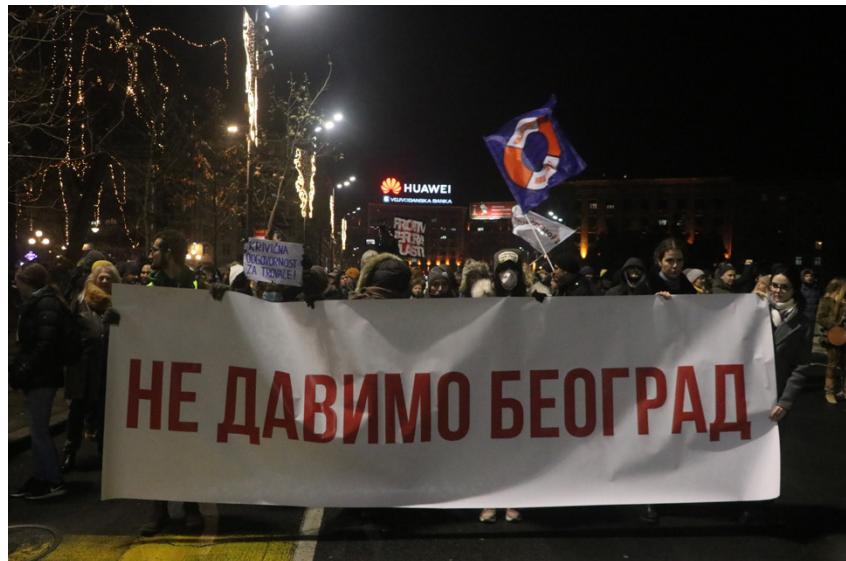
Serbia

Serbia's legal framework for environmental protection is anchored in its Constitution, which establishes the right to a healthy environment and the obligation to protect and improve it.¹⁷⁵ This framework is supported by laws on air protection, waste management, transport of dangerous goods, soil protection, water and nature protection.¹⁷⁶ Serbia has strengthened its environmental commitments through participation in numerous international treaties and conventions aimed at protecting nature.¹⁷⁷

Environmental crime in Serbia is governed by the Criminal Code, which defines violations, establishes prosecution procedures and sets sanctions for offences against a range of environmental regulations, including criminal acts, misdemeanours and economic offences that harm human health, plant and animal life, and natural resources.¹⁷⁸ To enhance enforcement, Serbia established a specialized Unit for Suppression of Environmental Crime and Environmental Protection within the Ministry of Internal Affairs in April 2022.¹⁷⁹

As part of its EU accession process, Serbia has aligned its domestic legislation with EU standards, particularly in the field of environmental protection and climate change mitigation.¹⁸⁰ The 2023 European Commission report identifies several priorities for Serbia: intensifying efforts to combat environmental crime, raising public awareness, and providing targeted training through the CEPOL (EU Agency for Law Enforcement Training) Exchange Programme. The report also recommends aligning

Belgrade citizens protest against air pollution, which is one of the leading causes of death in Serbia. © Filip Stevanovic/Anadolu Agency via Getty Images



planning and construction laws with international standards, adopting EU-compliant environmental impact assessment and strategic environmental assessment legislation, and harmonizing with the EU Environmental Crime Directive.¹⁸¹

To improve environmental monitoring and citizen engagement, the Ministry of Environment launched the gReact (Green Reaction) application in 2022.¹⁸² This digital platform has facilitated public reporting of environmental issues, with nearly 6 000 reports submitted in two years. Of these, 1 954 unique cases were processed, primarily concerning waste management, and roughly 850 issues were successfully resolved.¹⁸³

Responses across sectors

Environmental crime enforcement in Southern Europe (which includes the Western Balkans) presents significant challenges. According to the UN Office on Drugs and Crime (UNODC), while the region has strong criminal penalties for waste-related crimes, with 100% of countries having adequate legislation, other environmental offences receive less attention.¹⁸⁴ Criminal penalties are notably weaker for wildlife trafficking (with only 57% of countries having adequate legislation); pollution (43%); mining (29%); and fishing, deforestation and logging (21%).¹⁸⁵

The situation varies across the WB6, however, with each country facing distinct obstacles. In Bosnia and Herzegovina, for example, environmental crimes are increasingly attractive due to lenient penalties and a common perception that environmental offences do not directly harm human lives.¹⁸⁶ While some perpetrators have criminal backgrounds, approximately one-third are first-time offenders. The problem extends to businesses, particularly in construction, the importation of goods, energy projects and municipal waste management. Prosecutors' offices and police authorities in Bosnia and Herzegovina do not prioritize environmental crime investigations, and there are no specialized departments in police agencies that deal with this issue.¹⁸⁷ Limited police and prosecutorial capacity means that there were 1 980 confirmed indictments and 2 293 convictions of environmental violations in Bosnia and Herzegovina between 2017 and 2021.¹⁸⁸ While these figures may appear relatively high, they contrast with the estimated scale of unreported offences – for example, inspection data suggests that thousands of environmental infractions go unprosecuted annually.¹⁸⁹

The victims of environmental crime

Environmental crime, although often perceived as 'victimless', remains poorly understood due to insufficient research into its true extent and impact.¹⁹⁰ As a highly profitable and rapidly expanding form of transnational organized crime, its complex pattern of victimization – spanning different locations and affected groups – poses substantial difficulties for government and law enforcement responses.¹⁹¹ Understanding who qualifies as a victim of environmental crime further complicates the assessment of its impact. While criminologists and victimologists recognize various affected parties – including individuals, communities (such as indigenous peoples and farming groups), non-human species, local and global environments, and future generations – even nation states can also be considered victims of environmental crime, particularly when crimes such as illegal dumping or resource extraction compromise national sovereignty, contaminate ecosystems, or impose heavy financial and public health burdens.¹⁹²

Research by the UN Environment Programme (UNEP) highlights that environmental health directly influences human health and well-being.¹⁹³ Environmental degradation is estimated to cause between 174 and 234 times more premature deaths annually than armed conflict, with particularly severe impacts on vulnerable populations including the poor, migrant workers and the elderly.¹⁹⁴ The World Health Organization (WHO) further emphasizes that access to clean air, water and green spaces is essential for reducing mortality and morbidity, encouraging healthier lifestyles and supporting mental health.¹⁹⁵ This aligns with public sentiment: a survey conducted in Serbia in 2022 revealed that citizens prioritize environmental protection over economic growth, but lack confidence in institutional responses to environmental challenges.¹⁹⁶

Currently, at least 155 countries acknowledge their citizens' right to a healthy environment through national legislation or international agreements such as the Universal Declaration of Human Rights.¹⁹⁷

The UN Human Rights Council's recognition of a healthy environment as a human right underscores the importance of a rights-based approach to environmental issues.¹⁹⁸ However, despite numerous signed and ratified conventions and adopted laws on national and international levels, the WHO estimates that environmental risks – including air pollution, water contamination and chemical exposure – contribute to 23% of global deaths.¹⁹⁹ Air pollution alone accounts for approximately one in eight deaths, primarily through non-communicable diseases.²⁰⁰

The impact of air pollution extends beyond human health to affect social and economic development. In Bosnia and Herzegovina, for example, mortality from exposure to air pollution has an estimated annual economic cost of US\$1 billion–US\$1.8 billion,²⁰¹ representing 4.1%–7.4% of the country's 2023 GDP (US\$24.2 billion).²⁰² World Bank statistics indicate the annual death toll from air pollution to be 3 300 in Bosnia and Herzegovina, 1 600 in North Macedonia and 760 in Kosovo.

According to World Bank data from 2019, the mortality rate attributed to air pollution per 100 000 population varies considerably across the Western Balkans. The highest rates were recorded in Montenegro (115.2) and Bosnia and Herzegovina (113.9), followed by North Macedonia (95.6) and Serbia (71.5). Albania reported a lower rate of 49.7, while no data was available for Kosovo. These figures highlight the severe public health impact of air pollution across the WB6 and underscore the urgent need for stronger environmental and air quality policies.²⁰³

Environmental crimes also undermine crucial economic sectors such as food production, construction and public services. These illicit activities create unfair competition for legitimate businesses, increase consumer costs, and provide opportunities for criminal income generation and money laundering. Additionally, the significant environmental damage caused by these illicit economies imposes substantial financial burdens on governments for remediating or managing the consequences.²⁰⁴ ■

In Serbia, environmental crime enforcement faces similar obstacles to Bosnia and Herzegovina, primarily due to corruption and insufficient capacity within state administration and inspectorates.²⁰⁵ Although environmental crime detection has increased notably – with 2022 showing a 43% rise compared to 2021, 34% compared to 2020, and 10% compared to 2019 – judicial responses remain inadequate to address and deter offences effectively.²⁰⁶ In 2023, only 378 convictions resulted from 2 047 reported cases, including just 47 prison sentences and 101 fines. While timber theft cases are more frequently prosecuted, due to easier detection, serious pollution crimes rarely result in convictions (with just three in 2023), despite carrying prison sentences of up to five years.²⁰⁷

Montenegro's environmental protection system faces persistent criticism from civil society for being ineffective, and for intersecting with corruption and other misdemeanours. Court analysis reveals a pattern of minimal fines, often further reduced on prompt payment, particularly benefiting large projects such as hotels and concrete factories. Since 2018, misdemeanour courts have issued 23 rulings based on the Environmental Impact Assessment Act, with 78% of cases resulting in fines – many far below the prescribed minimum of €2 000 – and 18% resulting in acquittals.²⁰⁸

Albania has taken a stricter stance on environmental crimes since 2019, updating its Criminal Code to include offences such as pollution and waste management, with penalties ranging from fines to lengthy prison sentences.²⁰⁹ However, the country's environmental protection system lacks a clear distinction between administrative and criminal offences, has no unified system for reporting and prosecuting environmental crimes, and enforcement and prosecution are inconsistent.²¹⁰ In 2021, only 80 of 314 registered environmental crime cases reached court, with just 65 resulting in convictions.²¹¹ When pursuing indictments in 2021, prosecutors in Albania found that roughly a third of the requests were for a fine, while two-thirds requested a prison sentence for the perpetrator.²¹² The low level of punishment is due to insufficient evidence and inadequate investigation, highlighting the need for stronger enforcement and coordination of the entire criminal justice chain, comprising inspectorates, police, prosecution and the courts.²¹³

Kosovo reported 2 272 environmental offences between 2018 and 2023, covering such crimes as pollution, environmental degradation or destruction, illegal possession of dangerous substances or waste, and illegal hunting and fishing.²¹⁴ Despite some investigative efforts, particularly in cases involving illegal extraction of gravel from river beds,²¹⁵ judicial proceedings remain slow and penalties are rare. Similarly, North Macedonia shows increasing environmental crime accusations but declining convictions.²¹⁶ Most sentences are conditional or with relatively low fines imposed, ranging from €300 to €1 000.²¹⁷

Environmental crime investigation challenges across the region include the rapid dispersion of pollutants, complicating evidence collection and potentially leading to false negative conclusions about environmental offences.²¹⁸ The fragmented nature of environmental crime statistics in the Western Balkans further hampers assessment efforts, although the media, civil society and environmental activists continue to monitor and report on cases, highlighting the need for better enforcement and greater regional cooperation.

Environmental activism in the Western Balkans

Environmental crime in the WB6 meets with varying responses from media, civil society and government institutions.

In Bosnia and Herzegovina, local coverage remains limited due to a shortage of specialized environmental journalists and dedicated news platforms.²¹⁹ This gap has led to greater interest from foreign media than domestic outlets. Notably, rural communities typically demonstrate swift mobilization against environmental threats affecting their immediate surroundings, while urban responses tend to be slower, typically requiring intervention from civil society organizations.²²⁰ Environmental activists and journalists face concerning levels of intimidation and violence from private investors involved in or profiting from environmentally harmful projects and, at times, from law enforcement. They operate in an environment that lacks proper documentation of hazards and offers little support for whistleblowers or others exposed to environmental threats.²²¹ Meanwhile, the involvement of the academic community is minimal, often limited to producing industry-friendly studies that risk misleading the public.²²²

In Albania, although media and civil society reporting on environmental crimes has increased, there is widespread mistrust in institutional responses. Citizens are often hesitant to report environmental violations – especially those involving influential companies or powerful individuals – due to fears of retaliation and a lack of confidence that authorities will ensure accountability.²²³ The situation is exacerbated by unclear reporting mechanisms and poor information dissemination. While initiatives like the OSCE handbook aim to clarify local government responsibilities when it comes to dealing with environmental crime,²²⁴ weak enforcement and irregular monitoring persist. Media outlets such as Citizens Channel play a vital role in exposing environmental issues and advocating for solutions.²²⁵

In Serbia, the grassroots organization Pokret Tvrđava has emerged as a prominent environmental defender since 2018. Its activism includes organizing road and railway blockades to demand adherence to environmental laws and filing a criminal complaint against HBIS (Serbia Iron and Steel LLC), a Chinese-owned steel manufacturing company, for pollution violations.²²⁶ Despite facing both legal challenges and extra-institutional pressure, Pokret Tvrđava continues to advocate for accountability and environmental justice.²²⁷

Montenegro's environmental movement, led by NGOs including the Eco-team, has pushed for amendments to environmental laws to increase penalties for minor offences and reduce corruption. These organizations emphasize the importance of improving judicial understanding of environmental impacts, highlighting the need for better-informed legal frameworks.²²⁸

Throughout the Western Balkans, media outlets and civil society organizations serve as essential watchdogs in the fight against environmental crime. Despite operating under significant risks, these groups continue to expose environmental abuses and advocate for stronger protections, playing a crucial role in ensuring accountability and justice. ■



Air quality measurements in the Serbian town of Bor have revealed alarming levels of toxic metals, including arsenic and cadmium concentrations far above the legal limit. Photo: Pokret Tvdava



MAPPING A WAY FORWARD

As the Western Balkan countries pursue EU accession, aligning national environmental legislation and enforcement practices with the updated EU Environmental Crime Directive is both a requirement and an opportunity. Despite formal commitments and ratified treaties, the region still struggles with implementation gaps, weak institutional capacity and limited interagency coordination.

A collective, multi-sectoral approach – involving government, civil society, the private sector, academia and local communities – is crucial for ensuring meaningful progress. Collaboration fosters more sustainable and effective outcomes than isolated efforts, enhancing both enforcement and public accountability in the fight against environmental crime.

In light of these findings, the following recommendations outline key actions needed to strengthen environmental crime prevention and enforcement across the Western Balkans. Grounded in the challenges and good practices identified throughout this report, they aim to support legislative alignment with EU standards, enhance institutional capacity and promote a whole-of-society approach to environmental protection.

Recommendations

- Institutional capacity should be enhanced through the recruitment of experts and professional training. Strengthening management and controls at Western Balkan border crossings is vital for detecting cases of smuggling protected animal species.
- Combating environmental crime in the Western Balkans demands collective action from governments, civil society, academia, the private sector and local communities to protect the environment and foster sustainable development.
- Civil society organizations need greater support in their efforts to build community resilience to environmental crime. This should include the provision of comprehensive resources, specialized training programmes and adequate funding mechanisms, alongside strategic partnerships with academic institutions to enhance their investigative and preventive capabilities.
- Legal frameworks need to be updated to meet international standards, while public awareness campaigns should emphasize the importance of protecting the environment. These parallel efforts are critical to empowering communities to actively participate in preventing these crimes and safeguarding their environment.

- The international community must strengthen its response to environmental crime through coordinated action and demonstrate stronger political resolve to dismantle criminal networks that profit while destroying ecosystems, threatening species and fuelling illicit financial flows.
- Law enforcement agencies require improved institutional capacity and stronger controls on the ground to monitor and verify reports of environmental crime effectively. An important step is the establishment of dedicated environmental crime units within police forces, staffed by trained specialists.
- Police, prosecutors and the judiciary need specialized training on the far-reaching consequences of environmental crime. This training must be coupled with increased support for human resource development across these institutions to build lasting expertise.



In the Republic of Srpska, the financial losses caused by illegal logging, concentrated in the Jahorina area, amounted to around €1.5 million in 2018.
Photo: GI-TOC



NOTES

- 1 European Council, The EU's fight against environmental crime, 4 March 2024, <https://www.consilium.europa.eu/en/infographics/eu-fight-environmental-crime-2022>.
- 2 Earth League International, Environmental crime convergence, June 2023, <https://earthleagueinternational.org/wp-content/uploads/2023/06/ELI-Environmental-Crime-Convergence-Report-June-2023.pdf>.
- 3 World Health Organization, Health impact of ambient air pollution in Serbia, October 2019, <https://www.who.int/europe/publications/item/WHO-EURO-2019-3543-43302-60694>; Health Effects Institute, Trends in air quality and health in Southeast Europe: A State of Global Air special report, 2022, <https://www.stateofglobalair.org/resources/report/trends-air-quality-and-health-southeast-europe>.
- 4 European Council, The EU's fight against environmental crime, 4 March 2024, <https://www.consilium.europa.eu/en/infographics/eu-fight-environmental-crime-2022>.
- 5 See, for example, Baton Isniqi, Saws destroying the 'Sharri' National Park, World Wide Fund for Nature (WWF), 23 December 2020, <https://www.wwf.am/?1473441/Saws-destroying-the-Sharri-National-Park>.
- 6 Eko Forum, *Istraga se obustavlja nakon 1939 dana - ni kanton ni federacija ne žele provoditi istragu o krivičnom djelu onečišćenja okoliša*, 8 January 2021, <https://www.ekoforumzenica.ba/tag/kantonalno-tuzilastvo-zdk>; Samir Lemeš, Rusting promises and a judicial marathon, Heinrich Böll Stiftung, 2 February 2021, <https://ba.boell.org/en/2021/02/02/zahrdala-obecanja-i-pravosudni-maraton>.
- 7 Ibid.
- 8 Interviewees included crime investigators, environmental journalists, civil society activists, legal experts, and policymakers familiar with environmental enforcement and regulatory gaps.
- 9 For Albania, see: General Power of Attorney of Albania, *Raport i prokurorit të përgjithshëm mbi gjnedjen e kriminalitetit për vitin 2021*, March 2022, https://www.pp.gov.al/rc/doc/Raporti_Vjetor_Kuvendit_per_Kriminalitetin_2021_31_03_22_PP_6411.pdf; data for Bosnia and Herzegovina comes from an interview with the Judicial Analytics and Reporting Department of the High Judicial and Prosecutorial Council (HJPC), by email, 14 December 2023; data for Kosovo comes from a response to request for public information by Kosovo's prosecutor's office, by email, 21 May 2024; for Montenegro, see: Prosecutorial Council of Montenegro, 30 March 2022, <https://zakoni.skupstina.me/zakoni/web/dokumenta/zakoni-i-drugi-akti/447/2806-16203-00-72-22-8.pdf>; for North Macedonia, see: Екоцидот и официјално е ново кривично дело, правниците сметаат дека тешко ќе се докажува, Radio Mof, 17 March 2024, <https://www.radiomof.mk/ekocidot-i-oficijalno-e-novo-krivichno-delopravnicite-smetaat-deka-teshko-kje-se-dokazhuva>; for Serbia, see European Commission, Commission staff working document: Serbia 2023 report, 8 November 2023, https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD_2023_695_Serbia.pdf.
- 10 Interview with the Judicial Analytics and Reporting Department of the HJPC of Bosnia and Herzegovina, by email, 29 September 2024.
- 11 European Commission, Strategy and reports: 2023 Enlargement Package, https://neighbourhood-enlargement.ec.europa.eu/enlargement-policy/strategy-and-reports_en.
- 12 The civil society organizations involved were Citizens Channels in Albania, Global Analitika in Bosnia and Herzegovina, Forum for Civic Initiatives in Kosovo, LUPA in Montenegro, MEDIUM in North Macedonia and Pokret Tvrđava in Serbia.
- 13 GI-TOC, Global Organized Crime Index, Resilience, <https://ocindex.net/crime/resilience>.
- 14 See European Parliament, Treaty of Lisbon, <https://www.europarl.europa.eu/about-parliament/en/in-the-past/the-parliament-and-the-treaties/treaty-of-lisbon>.
- 15 FATF, Environmental crime, <https://www.fatf-gafi.org/en/publications/Environmentalcrime/Environmental-crime.html>.

16 Kateryna Boguslavská, Environmental crime data added to money laundering risk indicators in Basel AML Index, Basel Institute on Governance, 27 July 2022, <https://baselgovernance.org/blog/environmental-crime-data-added-money-laundering-risk-indicators-basel-aml-index>.

17 Environmental Crime Directive, European Commission, https://environment.ec.europa.eu/law-and-governance/environmental-compliance-assurance/environmental-crime-directive_en.

18 European Council, How the EU fights environmental crime, <https://www.consilium.europa.eu/en/infographics/eu-fight-environmental-crime-2018-2021>.

19 Europol, EU policy cycle – EMPACT, <https://www.europol.europa.eu/crime-areas-and-trends/eu-policy-cycle-empact>.

20 European Commission, Environmental crime directive, https://environment.ec.europa.eu/law-and-governance/environmental-compliance-assurance/environmental-crime-directive_en.

21 Linklaters, Green justice: EU unveils tough new measures to combat environmental crimes, <https://www.linklaters.com/en/insights/blogs/businesscrimelinks/2024/may/green-justice-eu-unveils-tough-new-measures-to-combat-environmental-crimes>.

22 Under Directive (EU) 2024/1203 on the protection of the environment through criminal law, civil society organizations and NGOs are granted specific procedural rights to participate in environmental criminal proceedings. See Article 15: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX%3A32024L1203>.

23 European Commission, Guidelines for the implementation of the Green Agenda for the Western Balkans, 6 October 2020, https://neighbourhood-enlargement.ec.europa.eu/system/files/2020-10/green_agenda_for_the_western_balkans_en.pdf.

24 GI-TOC, Global Organized Crime Index 2025, <https://ocindex.net>.

25 Igor Todorović, Leonardo DiCaprio backs campaign to protect Bosnian rivers, Balkan Green Energy News, 23 September 2020, <https://balkangreenenergynews.com/leonardo-dicaprio-backs-campaign-to-protect-bosnian-rivers>.

26 These include the diversion of river flows into pipes, which often leaves riverbeds dry and causes severe disruption to aquatic ecosystems. Many small hydropower plants are built in protect or ecologically sensitive areas, often without adequate environmental impact assessments. See Omer Karabeg, *Mini hidroelektrane, pogrebna preduzeća za reke u Srbiji i BiH*, Radio Slobodna Evropa, 20 January 2019, <https://www.slobodnaevropa.org/a/most-mini-hidroelektrane-srbija-bih/29719399.html>; and Barbara Pavlaković, Small hydropower plants in Western Balkan countries: status, controversies and a proposed model for decision making, *Energy, Sustainability and Society*, 12 (2022), <https://energsustainsoc.biomedcentral.com/articles/10.1186/s13705-022-00335-7>.

27 Leonardo DiCaprio podržao bh. okolišne aktiviste: 'Vi ste inspiracija!', Bljesak.info, 21 April 2023, <https://bljesak.info/gospodarstvo/ekologija/video-leonardo-dicaprio-podrzao-bh-okolisne-aktiviste-vi-ste-inspiracija/417427>.

28 Sladan Tomić, *Oni su sačuvali rijeke: Od nemoralnih ponuda preko prijetnji i batina do ucjena*, Udruženje mreža za izgradnju mira, 28 July 2022, <https://www.mreza-mira.net/vijesti/ekovijesti/oni-su-sacuvali-rijeke-od-nemoralnih-ponuda-preko-prijetnji-i-batina-do-ucjena>.

29 European Rivers Network, Goldman Environmental Prize for the 'brave women of Kruščica', 17 June 2021, <https://www.ern.org/en/goldman-environmental-prize-for-the-brave-women-of-kruscica>.

30 WWF, Brave Balkan women protecting our rivers, 8 March 2019, <https://www.wwf.mg/en/?344373/Brave-Balkan-Women-Protecting-Our-Rivers>.

31 WWF, Albanians rally against hydropower plants in the Valbona National Park, 4 November 2016, <https://wwf.panda.org/es/?2283471/Albanians-rally-against-hydropower-plants-in-the-Valbona-National-Park>.

32 Iskra Pavlova, China pours \$2.5 bln into Serbian copper mines over five years, SeeNews, 20 May 2024, <https://seenews.com/news/china-pours-25-bln-into-serbian-copper-mines-over-five-years-858233>.

33 In Serbian village, women fight to escape encroaching mine, Al Jazeera, 20 April 2024, <https://www.aljazeera.com/gallery/2024/4/20/in-serbian-village-women-fight-to-escape-encroaching-mine>.

34 Europol, Decoding the EU's most threatening criminal networks, 2024, <https://www.europol.europa.eu/cms/sites/default/files/documents/Europol%20report%20on%20Decoding%20the%20EU's%20most%20threatening%20criminal%20networks.pdf>.

35 Ibid.

36 INTERPOL, Environmental crime, <https://www.interpol.int/Crimes/Environmental-crime>.

37 Lukas Rüttinger et al, Regional Assessment for South-Eastern Europe. Security implications of climate change, OSCE, 2021, <https://www.osce.org/files/f/documents/a/a/484148.pdf>.

38 Ibid.

39 Luisa Olivi, The public's perception of the seriousness of environmental crimes related to environmental pollution and illegal waste trade: A case study of the Province of Brescia, Italy, *Journal of Illicit Economies and Development*, 2022, <https://jied.lse.ac.uk/articles/10.31389/jied.147>.

40 Europol, Environmental crime, <https://www.europol.europa.eu/crime-areas/environmental-crime>. The dumping and illegal transport of various kinds of hazardous waste is regarded as being in contravention of the 1989 Basel Convention on the Control of Transboundary Movement of Hazardous Wastes and Other Wastes and their Disposal.

41 UN Department of Economic and Social Affairs, The Sustainable Development Goals Extended Report 2022, https://unstats.un.org/sdgs/report/2022/extended-report/Extended-Report_Goal-11.pdf.

42 UNODC, Beyond borders: Combating waste crime for climate resilience and circular prosperity, 2023, <https://www.unodc.org/unodc/en/frontpage/2023/December/beyond-borders-combating-waste-crime-for-climate-resilience-and-circular-prosperity.html>.

43 S Mišljenović, *Protesti građana zbog otpada, koji je u vrećama stigao iz Italije: U Drvaru još čekaju da se smeće ukloni*, Novosti, 4 July 2020, https://www.novosti.rs/vesti/naslovna/republika_srpska/aktuelno.655.html:874206-PROTESTI-gradjana-zbog-otpada-koji-je-u-vrecama-stigao-iz-Italije-U-Drvaru-jos-cekaju-da-se-smece-ukloni.

44 Milkica Milojević, *Policija u Italiji istražuje aferu 'Drvar': Da li će otpad biti vraćen u Padovu*, Srpskainfo, 23 August 2020, <https://srpskainfo.com/policija-u-italiji-istrazuje-aferu-drvara-da-li-ce-otpad-bititi-vracen-u-padovu>.

45 Fahrudin Vojić, *Zašto je Švicarsku zabrinuo italijanski otpad deponovan u BiH?*, Al Jazeera, 11 August 2020, <https://balkans.aljazeera.net/teme/2020/8/11/zasto-je-svicarsku-zabrinuo-italijanski-otpad-deponovan-u-bih>.

46 Interview with journalist Milkica Milojević, 5 January 2023, by phone.

47 *Protest Drvarčana: Traže da se tekstilni otpad vrati u Italiju*, Al Jazeera, 7 July 2020, <https://balkans.aljazeera.net/videos/2020/7/7/protest-drvarcana-traze-da-se-tektstilni-otpad-vrati-u-italiju>.

48 *Policija u Italiji istražuje aferu otpada u Drvaru: Da li će biti vraćen u Padovu?*, Klix, 23 August 2020, <https://www.klix.ba/vijesti/bih/policija-u-italiji-istrazuje-aferu-otpada-u-drvaru-da-li-ce-bititi-vracen-u-padovu/200823013>; Milkica Milojević, *Epilog afere 'Italijanski Otpad': Da li će gradani zagadivaču platiti millionsku odštetu?*, Inforadar, 19 March 2021, <https://inforadar.ba/epilog-afere-italijanski-otpad-da-li-ce-gradani-zagadivacu-platiti-millionsku-odstetu>; *Rješenje za otpad iz Italije: Struka dala sud, spaljivanje zadnji način*, Akta, 5 August 2020, <https://www.akta.ba/vijesti/bih/121586/rjesenje-za-otpad-iz-italije-struka-dala-sud-spaljivanje-zadnji-nacin>.

49 Federica Marsi, *Italy's war on illegal waste*, Politico, 2 November 2020, <https://www.politico.eu/article/italys-war-on-illegal-waste>.

50 Vittorio Malagutti, *Waste trafficking: A dirty Italian affair poisons the Balkans*, Worldcrunch, 23 March 2021, <https://worldcrunch.com/world-affairs/waste-trafficking-a-dirty-italian-affair-poisons-the-balkans>.

51 Ibid.

52 Italian police seizes 25 tonnes of waste electrical equipment bound for Albania, Exit, 26 February 2020, <https://exit.al/en/italian-police-seizes-25-tonnes-of-waste-electrical-equipment-bound-for-albania>.

53 BIRN, *Soaring air pollution in region stokes health fears*, Balkan Insight, 4 January 2023, <https://balkaninsight.com/2023/01/04/soaring-air-pollution-in-region-strokes-health-fears>.

54 WHO, *Health impact of ambient air pollution in Serbia: A call to action*, October 2019, <https://www.who.int/europe/publications/i/item/WHO-EURO-2019-3543-43302-60694>.

55 World Bank Group, *Going green means cleaner air, healthier living in the Western Balkans*, 17 May 2021, <https://www.worldbank.org/en/news/feature/2021/05/17/going-green-means-cleaner-air-healthier-living-in-the-western-balkans>.

56 Interview with Marija Simić Lazarević, Požarevac, Serbia, 22 November 2023.

57 Ibid.

58 Interview with Irena Barbulović, councillor from the Ne damo initiative, Majdanpek, Serbia, 29 November 2023.

59 See, for example, Iskra Krstić, *Rudarski grad Majdanpek: simbol destrukcije okoliša, ali i otpora*, Biltén, 21 October 2022, <https://www.biltén.org/?p=43134>; Majdanpek je čekaonica za smrt, u svakoj porodici bar jedan oboleo od raka, Ozon Press, 7 October 2022, <https://www.ozonpress.net/politika/majdanpek-je-cekaonica-za-smrt-u-svakoj-porodici-bar-jedan-oboleo-od-raka>; Institute of Public Heath of Serbia Dr Milan Jovanovic Batut, *Health Statistical Yearbook of the Republic of Serbia*, 2019, <https://www.batut.org.rs/download/publikacije/pub2019a.pdf>; Ekološki odgovor, *Ubijanje zlatonosne reke*, 19 June 2023, <https://ekoloskiodgovor.rs/ubijanje-zlatonosne-reke>; Savetnik SZO: *Objasniti zašto je studija o zagađenju u Srbiji kasno objavljena*, 7 October 2021, <https://novaekonomija.rs/vesti-iz-zemlje/savetnik-szo-objasniti-zasto-je-studija-o-zagadjenju-u-srbiji-kasno-objavljena>; Institute of Public Heath of Serbia Dr Milan Jovanovic Batut, *Unapređenje upravljanja kontaminiranim lokalitetima u Srbiji*, 2020, <https://degradacijazemljista.sepa.gov.rs/?p=1277>.

60 Just Finance International, *Despair among Serbian farmers when their land is confiscated*, 23 February 2024, <https://justfinanceinternational.org/2024/02/23/despair-among-serbian-farmers-when-their-land-is-confiscated>; Business and Human Rights Resource Centre, Serbia: *Zijin Mining's expansion in Bor and Majdanpek prompts land confiscation claims and environmental concerns*, <https://www.bhrrc.org/tr/en-son-haberler/serbia-zijin-minings-expansion-in-bor-and-majdanpek-prompts-land-confiscation-claims-and-environmental-concerns>.

61 When you breathe arsenic for 150 euros more, Vreme, 29 April 2025, <https://www.vreme.com/en/drustvo/kad-dises-arsen-za-150-evra-vise>.

62 Interview with councillor Irena Živković, president of the Freedom and Justice Party in Bor, Serbia, 21 December 2023; see also Branko Pešić, *If this continues, we will not survive*, Vreme, 16 March 2022, <https://www.vreme.com/en/vreme/ako-se-ovako-nastavi-opstanka-nam-nema>; Study:

industrially contaminated sites throughout Serbia threaten human health, Balkan Green Energy News, 23 September 2021, <https://balkangreenenergynews.com/study-industrially-contaminated-sites-throughout-serbia-threaten-human-health>.

63 Andrew Higgins, Serbia hails Chinese companies as saviors, but locals chafe at costs, *The New York Times*, 27 March 2021, <https://www.nytimes.com/2021/03/27/world/europe-serbia-chinese-companies-pollution.html>.

64 Milivoje Pantovic and Chris Harris, Is Serbia manipulating data to cover up its air pollution problem?, Euronews, 7 January 2021, <https://www.euronews.com/my-europe/2021/01/07/is-serbia-manipulating-data-to-cover-up-its-air-pollution-problem>.

65 European Commission, North Macedonia 2023 Report, 8 November 2023, https://enlargement.ec.europa.eu/north-macedonia-report-2023_en.

66 Ajit Niranjan, 'The air tastes like burnt plastic': Skopje's chronic pollution problem, *The Guardian*, 20 September 2023, <https://www.theguardian.com/world/2023/sep/20/air-tastes-like-burnt-plastic-skopje-chronic-pollution-problem-north-macedonia>.

67 World Bank, Western Balkans Regional AQM - Western Balkans Report – AQM in Kosovo, October 2019, <https://documents1.worldbank.org/curated/en/214511576520047805/pdf/Air-Pollution-Management-in-Kosovo.pdf>.

68 Besnik Boletini and Qëndrim Bunjaku, *Ajri kërcënëm për jetën*, Çohu, 11 November 2020, <https://preportr.cohu.org/sq/hulumtime/Ajri-kercenim-per-jeten-326>; Environmental Protection Agency, Annual report on the state of the air in Kosovo in 2019, 2020, https://ammk-rks.net/assets/cms/uploads/files/Ajri/Raporti_p%C3%ABr_gjendjen_e_ajrit_n%C3%AB_Kosov%C3%AB_per_vitin_2019_ok-min.pdf.

69 European Commission, Enlargement and Eastern Neighbourhood, Annex 4 to the Commission Implementing Decision on the financing of the annual action plan in favour of Kosovo for 2021: Action Document for 'EU for Environment', https://enlargement.ec.europa.eu/document/download/0e664aaf-a8f5-4ae1-a74c-992d1e330953_en.

70 Environmental Protection Agency, Annual report on the state of the air in Kosovo in 2019, 2020, https://ammk-rks.net/assets/cms/uploads/files/Ajri/Raporti_p%C3%ABr_gjendjen_e_ajrit_n%C3%AB_Kosov%C3%AB_per_vitin_2019_ok-min.pdf.

71 Ibid.

72 UN Economic Commission for Europe, UNDA Project 1819AE: Montenegro – Improving air quality, <https://unece.org/environment-policy/environmental-performance-reviews/unda-project-1819ae-montenegro-improving-air>; European Environment Agency, Montenegro – air pollution country fact sheet, <https://www.eea.europa.eu/themes/air-country-fact-sheets/2023-country-fact-sheets/montenegro-air-pollution-country>.

73 Lela Šćepanović, *Gradjanka protiv države Crne Gore zbog zagadenja vazduha u Pljevljima*, Radio Slobodna Evropa, 16 January 2024, <https://www.slobodnaevropa.org/a/crna-gora-pljevlja-tuzba-zagadjenje/32776810.html>.

74 Danilo Ajković, Court accepts Hrković's lawsuit: State responsible for air pollution in Pljevlja, *Vijesti*, 18 February 2025, <https://en.vijesti.me/tv/shows/746011/Court-accepts-Hrkovic%27s-lawsuit%2C-holding-state-responsible-for-air-pollution-in-Pljevlja>.

75 Interview with Lulzim Bauman, circular economy and waste management expert for Kosovo and Albania, 2 December 2022.

76 Entenela Ndrevataj, *Jeta pranë rrjedhës së lumi Ishëm, mes përmbytjeve dhe ndotjes nga mijëra kilogram mbetje*, Citizens, 2 February 2021, <https://citizens-channel.com/2021/02/02/jeta-prane-rrjedhes-se-lumit-ishem-mes-permbytjeve-dhe-ndotjes-nga-mijera-kilogram-mbetje>; Elira Kadriu, *Nivel i lartë i ndotjes në basenin e Ishmit rrezik për jetën e banorëve*, Citizens, 28 July 2020, <https://citizens-channel.com/2020/07/28/nivel-i-larte-i-ndotjes-ne-basenin-e-ishmit-rrezik-per-jeten-e-banoreve>.

77 *Mbi 112 milionë euro për impiantet, por ujërat e ndotura derdhen në det të patrjituara*, Vox News, 21 July 2022, <https://www.voxnews.al/investigim/2-milione-euro-per-impiantet-por-ujerat-e-ndotura-derdhen-ne-det-te-p-i14821>.

78 Ibid.

79 Drenushe Ramadani, Kosovo, the country that exports sewage, Prishtina Insight, 20 May 2022, <https://prishtinainsight.com/kosovo-the-country-that-export-mags-sewage>.

80 Kyle Kavanagh Sweeney, Kosovo's looming water security problem, Prishtina Insight, 6 November 2017, <https://prishtinainsight.com/kosovos-looming-water-security-problem>; Xhorxhina Bami, Pipe dreams: Much of Kosovo still waiting for proper sewage system, Balkan Insight, 9 February 2022, <https://balkaninsight.com/2022/02/09/pipe-dreams-much-of-kosovo-still-waiting-for-proper-sewage-system>.

81 Lejla Mujagić, Locals express concern about pollution of Drina River, N1 Info, 4 April 2018, <https://n1info.ba/english/news/a252614-locals-express-concern-about-pollution-of-drina-river>; Saule Akhmetkaliyeva, Illegal landfill sites in the Balkans affecting water pollution, Eurasian Research Institute, <https://www.eurasian-research.org/publication/illegal-landfill-sites-in-the-balkans-affecting-water-pollution>.

82 Eldar Emrić, 'New year, old problems': Bosnia river plagued with tonnes of trash once again, Euronews, 12 January 2024, <https://www.euronews.com/green/2024/01/12/new-year-old-problems-bosnia-river-plagued-with-tonnes-of-trash-once-again>; Reuters, Bosnia's spoiled beauty: An emerald river is once again choked with trash, Radio Free Europe/Radio Liberty, 13 January 2024, <https://www.rferl.org/a/bosnia-drina-river-garbage-health-world-heritage-trash/32766976.html>.

83 Charlotte Elton, If we all cycled like the Dutch, CO2 emissions would drop by 690 million tonnes, Euronews, 3 June 2023, <https://www.euronews.com/green/2023/06/03/on-your-bike-if-we-all-cycled-like-the-dutch-global-emissions-drop-nearly-700-million-tonn>; Eldar Emrić, Tons of trash clogs a river in Bosnia. It's a seasonal problem that activists want an end to, AP News, 12 January 2024, <https://apnews.com/article/bosnia-garbage-drina-river-pollution-visegrad-bc7c900dcd5f59adb00c75cbd3bea5c7>.

84 M Obradović, *Privatizacija RTB-a: rešavanje problema ili prodaja u bescenje*, Danas, 19 August 2018, <https://www.danas.rs/vesti/ekonomija/privatizacija-rtb-a-resavanje-problema-ili-prodaja-u-bescenje>; Svetlana Božić Krainčanić, *Ko je odgovoran za pojačano zagađenje vazduha u Boru?*, Radio Slobodna Evropa, 18 October 2019, <https://www.slobodnaevropa.org/a/zagadjenje-vazduh-bor/30221781.html>; Bor: *Krivična prijava protiv direktora kineskog Zidina zbog zagađenja*, Radio Slobodna Evropa, 2 December 2019, <https://www.slobodnaevropa.org/a/bor-krivi%C4%8Dna-prijava-protiv-direktora-kineskog-zi%C4%91ina-zbog-zaga%C4%91enja-/30303844.html>; Boris Mrkela, *Mještani ugroženi nakon što je kineski Zijin utostručio proizvodnju u kombinatu bakra u Srbiji*, Just Finance International, 17 May 2022, <https://justfinanceinternational.org/2022/05/17/mjestani-ugrozeni-nakon-sto-je-kineski-zijin-utostrucio-proizvodnju-u-kombinatu-bakra-u-srbiji>; *Prekomerno zagadenje sumpor dioksidom u Boru*, Radio Slobodna Evropa, 3 July 2019, <https://www.slobodnaevropa.org/a/30034478.html>.

85 Interview with Dragoslav Stančulović, president of the local community, Oštrelj, Bosnia and Herzegovina, 15 December 2022; interview with activist Vesna Predić – Petrović, Oštrelj, Bosnia and Herzegovina, 15 December 2022; interview with councillor Dragan Marković, leader of the United Opposition in Bor, Serbia, 21 December 2022; interview with councillor Irena Živković, president of the Freedom and Justice Party, Bor, Serbia, 21 December 2022; Milan Jovanovic Batut, *Improving Contaminated Sites Management in Serbia*, Institute of Public Health of Serbia, 2020.

86 Serbian town sues Chinese company Zijn over air pollution, Euractiv, 16 September 2020, https://www.euractiv.com/section/politics/short_news/serbian-town-sues-chinese-company-zijn-over-air-pollution; interview with Dejan Lekić, Former Assistant Director at Serbian Environmental Protection Agency, Belgrade, 6 February 2023.

87 Successful Wildlife Crime Prosecution in Europe (SWIPE), *Uncovering the Invisible: Successes and Challenges for Wildlife Crime Prosecution in Europe*: European Summary Report, March 2023, https://stopwildlifecrime.eu/wp-content/uploads/2023/08/SWIPE-European-Summary-Report_2023.pdf.

88 Global Voices, *Illegal wildlife poisoning depletes Balkan biodiversity, yet only 1% of cases reach court*, 26 May 2022, <https://globalvoices.org/2022/05/26/illegal-wildlife-poisoning-depletes-balkan-biodiversity-yet-only-1-of-cases-reach-court>.

89 SWIPE, *Uncovering the Invisible: Successes and Challenges for Wildlife Crime Prosecution in Europe*: European Summary Report, March 2023, https://stopwildlifecrime.eu/wp-content/uploads/2023/08/SWIPE-European-Summary-Report_2023.pdf.

90 Vanja Stokić et al, *Italijanski krivolovci predstavljeni kao turisti u BiH*, eTrafika, 5 February 2025, <https://etrafika.net/drustvo/95652/italijanski-krivolovci-predstavljeni-kao-turisti-u-bih>.

91 SWIPE, *Uncovering the Invisible: Successes and Challenges for Wildlife Crime Prosecution in Europe*: European Summary Report, March 2023, https://stopwildlifecrime.eu/wp-content/uploads/2023/08/SWIPE-European-Summary-Report_2023.pdf.

92 Marija Janković, *Pronađen lav u Crnoj Gori: Policija utvrđuje kako je životinja stigla u Budvu*, BBC News, 9 February 2022, <https://www.bbc.com/serbian/lat/balkan-60319036>; WWF: *Odbjegli lav u Budvi ukazuje na problem krijumčarenja životinja*, Ekovjesnik, 9 February 2022, <https://ekovjesnik.com/clanak/4816/wwf-odbjegli-lav-u-budvi-ukazuje-na-problem-krijumcarenja-zivotinja>; Danka Caković, *Environmental life in Montenegro*, OSCE, 2023, https://www.osce.org/files/documents/c/8/570285_1.pdf.

93 Božidar Jelovac, NVO 'Breznica': *Ukrajinci ubijaju zaštićenu divljač u Nacionalnim parkovima Crne Gore - ustrijelili divojarca*, DAN, 23 December 2022, <https://www.dan.co.me/vijesti/drustvo/nvo-breznica-ukrajinci-ubijaju-zasticenu-divljac-u-nacionalnim-parkovima-crne-gore-ustrijelili-divojarca-5152813>; interview with Aleksandar Dragićević, environmental activist in Podgorica, 1 December 2022.

94 Nada Kovačević, *Crveni poskok sa Ade se prodaje na evropskim sajtvima*, Pobjeda, 19 March 2022, <https://www.pobjeda.me/clanak/crveni-poskok-sa-ade-se-prodaje-na-evropskim-sajtvima>; Horned viper species overview, Ontosight, <https://ontosight.ai/glossary/term/horned-viper-species-overview--67a198706c3593987a590f5e>.

95 Criminal Code of Montenegro, <https://www.paragraf.me/propisi-crnegore/krivicni-zakonik-crne-gore.html>.

96 Interview with a Montenegrin police officer, Podgorica, 7 February 2023.

97 Andela Minić, *Inspektori 'žmure' na šverc životinja*, RTCG, 8 September 2023, <https://rtcg.me/vijesti/drustvo/465226/inspektori-zmure-na-sverc-zivotinja.html>; *Bez prihvatilišta nema ni borbe protiv krijumčarenja životinja*, Analitika, 12 February 2022, <https://www.portalanalitika.me/clanak/bez-prihvatilista-nema-ni-borbe-protiv-krijumcarenja-zivotinja>.

98 Illegal, unregulated and unreported (IUU) fishing is in contravention to controls imposed by various regional fisheries management organizations. Parliamentarians for

Global Action, Campaign for the protection of the oceans & implementation of SDG 14: The three treaties to address illegal, unreported, and unregulated fishing, https://www.pgaction.org/pdf/2020/factsheet-three-treaties_en.pdf; WWF, Illegal, unreported and unregulated fishing, <https://www.wwf.org.uk/what-we-do/illegal-unreported-unregulated-fishing>.

99 World Bank, Illegal logging, fishing, and wildlife trade: The costs and how to combat it, October 2019, <https://pubdocs.worldbank.org/en/482771571323560234/WBGR1017Digital.pdf>.

100 Authorities step up patrols to curb illegal fishing at Lake Doirani during spawning season, Ekathimerini, 11 April 2025, <https://www.ekathimerini.com/news/environment/1266743/authorities-step-up-patrols-to-curb-illegal-fishing-at-lake-doirani-during-spawning-season>; Richard Mertens, In North Macedonia, an ancient lake faces modern threats, Yale Environment 360, 18 June 2024, <https://e360.yale.edu/features/lake-ohrid-ancient-lakes-climate-change>.

101 European Commission, North Macedonia 2023 Report, 8 November 2023, https://neighbourhood-enlargement.ec.europa.eu/document/download/28a9322a-3f18-434e-89d2-0890c90b2f96_en?filename=SWD_2023_693%20North%20Macedonia%20report.pdf.

102 Sonja Ajanovska, Немилосрдно истребување на рибниот фонд во Охридско езеро, Denes Magazin, 12 February 2021, <https://denesmagazin.mk/nemilosrdno-istrebuvane-na-ribniot-fond-vo-ohridsko-ezero>.

103 Goran Naumovski, More than 100 pieces of Ohrid trout illegally caught in Lake Ohrid were seized, Sloboden Pečat, 2021, <https://www.slobodenpecat.mk/en/odzemeni-nad-100-parchinja-ohridska-pastrmka-nezakonski-ulovena-vo-ohridskoto-ezero>; Fishing nets were found and seized in Lake Ohrid with 93 pieces of fish caught, Sloboden Pečat, 2023, <https://www.slobodenpecat.mk/en/najdeni-i-odzemeni-ribarski-mrezhi-vo-ohridsko-ezero-so-uloveni-93-parchinja-riba>.

104 Macedonian Institute for Media, Illegal fishing, neglect pose risks to Lake Ohrid, Transitions, 19 July 2024, <https://tol.org/client/article/illegal-fishing-neglect-pose-risks-to-lake-ohrid.html>.

105 Interview with an environmental activist in Ohrid, 8 March 2024.

106 Uhapšeni zbog nedozvoljenog ribolova: Na mrežu hvatali vrstu ribe koja je strogo zaštićena, Pink.rs, 2021, <https://pink.rs/chronika/334258/uhapseni-zbog-nedozvoljenog-ribolova-na-mrezu-hvatali-vrstu-ribe-koja-je-strogo-zasticena>.

107 BIRN, Chopping down the future: Heating crisis worsens illegal logging in Balkans, Balkan Insight, 21 September 2022, <https://balkaninsight.com/2022/09/21/chopping-down-the-future-heating-crisis-worsens-illegal-logging-in-balkans>.

108 EULEX, Illegal wood-cutting: One of Kosovo's most difficult rule of law issues, 17 September 2012, <https://www.eulex-kosovo.eu/?page=3,11,2146>.

109 Forestry agency: The level of illegal logging in Kosovo has increased, Koha, 29 September 2022, <https://www.koha.net/en/arberi/345887/agjencia-e-pyjeve-eshte-rritur-nivel-i-prerjeve-ilegale-te-pyjeve-ne-kosove>.

110 Baton Isniqi, Saws destroying the 'Sharri' National Park, WWF, 23 December 2020, <https://www.wwf.am/?1473441/Saws-destroying-the-Sharri-National-Park>.

111 Baton Isniqi, Saws destroying the 'Sharri' National Park, WWF, 23 December 2020, <https://www.wwf.am/?1473441/Saws-destroying-the-Sharri-National-Park>; Kosovo loses more than 700 hectares of forest annually, TRT World, <https://www.trtworld.com/video/news/kosovo-loses-more-than-700-hectares-of-forest-annually-18171932>.

112 Fatos Bytyci, Seed-dropping drones seek to halt Kosovo's deforestation, Reuters, 14 May 2024, <https://www.reuters.com/business/environment/seed-dropping-drones-seek-halt-kosovos-deforestation-2024-05-14>.

113 European Commission, Kosovo 2023 Report, 8 November 2023, https://neighbourhood-enlargement.ec.europa.eu/document/download/760aacc4-4e88-4667-8792-3ed08cdd65c3_en?filename=SWD_2023_692%20Kosovo%20report_0.pdf.

114 Lela Šćepanović, Koncesije uništile crnogorske šume i oštetile budžet, Radio Slobodna Evropa, 26 November 2021, <https://www.slobodnaevropa.org/a/crna-gora-koncesije-sume-budzet/31581657.html>; Danka Cakovic, Environmental crime in Montenegro, OSCE, 2023, https://www.osce.org/files/documents/c/8/570285_1.pdf.

115 A Dučić, Istražili smo bespravnu sjeću šume i gradnju apartmana na Bjelašnici, Fokus, 2022, <https://www.fokus.ba/vijesti/bih/istražili-smo-bespravnu-sjecu-sume-i-gradnju-apartmana-bjelasnici/2407120>; Center for Investigative Reporting, Bjelašnica: Bespravna sjeća šume za novi kompleks, Voice of America, 23 July 2020, <https://ba.voanews.com/a/cin-2020-sjeca-sume-bjelasnica/5514547.html>.

116 Interview with an investigative journalist, Sarajevo, 8 August 2024.

117 Ibid.

118 Karolina Rastija, Šumokradice su lani posjekle šume u vrijednosti 2,89 miliona KM, Agroklub, 3 March 2018, <https://www.agroklub.ba/sumarstvo/sumokradice-su-lani-posjekle-sume-u-vrijednosti-289-miliona-km/40619>.

119 Andrijana Pisarević, Isjekao državnu šumu pa kupio pola planine od Srpske, Capital, 1 February 2024, <https://www.capital.ba/isjekao-drzavnu-sumu-pa-kupio-pola-planine-od-srpske>; Tužilaštvo trebalo četiri godine za optužnucu protiv Srđana Klječanina, BN, 17 February 2025, <https://www.rtvbn.com/4072132/tuzilastvu-trebale-cetiri-godine-za-optuznucu-protiv-srdjana-kljecanina>.

120 CITES, List of contracting parties, <https://cites.org/eng/disc/parties/chronolo.php>.

121 Basel Convention, Parties to the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, <https://www.basel.int/Countries/StatusofRatifications/PartiesSignatories/tabcid/4499/Default.aspx>.

122 Convention on Access to Information, Public Participation in Decision-Making and Access to Justice in Environmental Matters (Aarhus Convention), UN Treaty Collection, https://treaties.un.org/Pages/ViewDetails.aspx?src=IND&mtdsg_no=XXVII-13&chapter=27.

123 UN Convention against Transnational Organized Crime, Chapter XVIII: Penal matters, UN Treaty Collection, https://treaties.un.org/pages/ViewDetails.aspx?src=TREATY&mtdsg_no=XVIII-12&chapter=18&clang=_en.

124 Joint Liaison Group of the Rio Conventions, Forests: Climate change, biodiversity and land degradation, https://unfccc.int/resource/docs/publications/forest_eng.pdf.

125 European Commission, Albania 2023 Report, 8 November 2023, https://neighbourhood-enlargement.ec.europa.eu/system/files/2023-11/SWD_2023_690%20Albania%20report.pdf; UNEP and LEAP, Law No. 7664 on Environmental Protection, <https://leap.unep.org/countries/al/national-legislation/law-no-7664-environmental-protection>.

126 Republic of Albania, Law No. 162/2014 on the Protection of the Environment, as amended, Official Bulletin, available at: <https://qbz.gov.al/preview/635d44bd-96ee-4bc5-8d93-d928cf6f2abd>.

127 Republic of Albania, Criminal Code of the Republic of Albania, Law No. 7895, dated 27.01.1995, as amended, Official Bulletin, available at: <https://qbz.gov.al/preview/a2b117e6-69b2-4355-aa49-78967c31bf4d>.

128 European Commission, Albania 2022 Report, 12 October 2022, <https://neighbourhood-enlargement.ec.europa.eu/system/files/2022-10/Albania%20Report%202022.pdf>.

129 Ibid.

130 Interview with Elton Qendro, National Advisor at OSCE Presence in Albania, 12 December 2022.

131 OSCE, Baseline assessment: On the inspection, investigation, and punishment of environmental contraventions and crimes in Albania, January 2023, <https://www.osce.org/files/documents/d/9/546515.pdf>.

132 European Commission, Chapters of the acquis, https://neighbourhood-enlargement.ec.europa.eu/enlargement-policy/conditions-membership/chapters-acquis_en; interview with environmental crime expert Luan Mema, General Directorate of the State Police, Tirana, Albania, 5 December 2022.

133 Ministry of the Interior (Albania), *Krimet mjedisore denoncohen edhe në Komisariatin Dëxhital/Çuç: 5 rubrika specifike në aplikacion. Mjet në duart e publikut për të raportuar paligjshmerinë në mjedis*, December 2021, <https://arkiva.mb.gov.al/krimet-mjedisore-denoncohen-edhe-ne-komisariatin-dixhital-cuci-5-rubrika-specifike-ne-aplikacion-mjet-ne-duart-e-publikut-per-te-raportuar-paligjshmerine-ne-mjedis>.

134 Interview with Azra Mulahasanović, Public Affairs Department of the OSCE Mission to Bosnia and Herzegovina, Sarajevo, 8 December 2023.

135 Safet Mušić, *Ekološki kriminal u Bosni I Hercegovini: visoko profitabilan kriminal sa niskim rizikom*, Global Analitika, November 2023, <https://mislioprirodi.ba/wp-content/uploads/2024/02/Ekoloski-kriminal-u-BiH-Global-Analitika.pdf>.

136 Eko Forum Zenica, *Ukaz o proglašenju Zakona o Zaštiti Okoliša*, Official newspaper of the Federation of Bosnia and Herzegovina, no 15/21, https://www.ekoforumzenica.ba/wp-content/uploads/2021/02/Zakon_o_zastiti_okolisa_FBiH_15_21.pdf; Advokat Prnjavorac, *Zakon o Zaštiti prirode Republike Srpske*, <https://advokat-prnjavorac.com/zakoni/Zakon-o-zastiti-prirode-Republike-Srpske.pdf>.

137 Safet Mušić, *Ekološki kriminal u Bosni I Hercegovini: visoko profitabilan kriminal sa niskim rizikom*, Global Analitika, November 2023, <https://mislioprirodi.ba/wp-content/uploads/2024/02/Ekoloski-kriminal-u-BiH-Global-Analitika.pdf>.

138 Ministry of Security (Bosnia and Herzegovina), Criminal Code of Bosnia and Herzegovina, <http://msb.gov.ba/anti-trafficking/zakonodavstvo/zakoni/?id=3868>.

139 Nedžad Korajlić et al, *Kriminalističko – kriminološke specifičnosti ekološkog kriminaliteta*, Univerzitska Hronika, 3 (2010), <https://casopis.fmpf.edu.ba/images/casopis/3/3-11.pdf>.

140 Interview with Admir Alagić, Spokesperson for the Ministry of Security, 26 January 2024, online.

141 Parliament of the Federation of BiH, *Federalna strategija zaštite okoliša 2022. – 2032.*, August 2022, https://parlamentfbih.gov.ba/v2/userfiles/file/Materijali%20u%20proceduri_2022/Feder_%20strat_za%C5%A1t_okoli%C5%A1a%20-%20bos.pdf; Bosnia and Herzegovina Environmental Strategy and Action Plan 2030+, Стратегија Заштите Животне Средине Републике Српске 2022. – 2032. усвојена, <https://esap.ba/sr/environmental-strategy-of-republica-srpska-2022-2032-adopted>.

142 European Commission, Bosnia and Herzegovina 2023 Report, 8 November 2023, https://neighbourhood-enlargement.ec.europa.eu/document/download/e3045ec9-f2fc-45c8-a97f-58a2d9b9945a_en?filename=SWD_2023_691%20Bosnia%20and%20Herzegovina%20report.pdf.

143 Ibid.

144 Albinot Maloku, *Legislacioni i Republikës së Kosovës në fushën e mjedisit*, Global Challenge, 4, 3 (2015), https://www.academia.edu/20046363/Legislacioni_i_Republik%C3%ABs_s%C3%AB_Kosov%C3%ABs_n%C3%AB_fush%C3%ABn_e_mjedisit.

145 OSCE Mission in Kosovo, *Qeverisja efektive e mjedisit kërkon mbikqyrje të fuqishme parlamentare*, December 2007, <https://www.osce.org/files/f/documents/6/9/30094.pdf>.

146 EFACE, The EU's promotion of environmental protection through criminal law in Kosovo, <https://efface.eu/eus-promotion-environmental-protection-through-criminal-law-kosovo/index.html>.

147 Official Gazette of the Republic of Kosovo, Criminal Code of the Republic of Kosovo, <https://gzk.rks-gov.net/ActDetail.aspx?ActID=18413>.

148 Kosovo Police, Investigation Department, <https://www.kosovopolice.com/en/departments/investigation-department>.

149 Analysis of the Kosovo legislation in the environmental field by legal expert Rinon Arifi, September 2022; Antigonë Isufi and Egzon Dahsyla, Calls to ban small power plants at first water protection summit, Prishtina Insight, 17 October 2022, <https://prishtinainsight.com/calls-to-ban-small-power-plants-at-first-water-protection-summit>; Rinon Arifi, Sustainable economic development and environmental protection – The current situation and challenges in Kosovo, LinkedIn, 11 May 2022, <https://www.linkedin.com/pulse/sustainable-economic-development-environmental-protection-rinon-arifi/>; Albinot Maloku, *Legislacioni i Republikës së Kosovës në fushën e mjedisit*, Global Challenge, 4, 3 (2015), https://www.academia.edu/20046363/Legislacioni_i_Republik%C3%ABs_s%C3%AB_Kosov%C3%ABs_n%C3%AB_fush%C3%ABn_e_mjedisit.

150 Ibid.

151 EULEX, EULEX raises awareness of environmental crimes in partnership with the EU- funded Project HAPE, <https://eulex-kosovo.eu/?page=2,11,2892>; OSCE, OSCE Mission supports Kosovo in the fight against environmental crime, 10 December 2021, <https://www.osce.org/mission-in-kosovo/507920>.

152 European Commission, Kosovo 2023 Report, 8 November 2023, https://neighbourhood-enlargement.ec.europa.eu/document/download/760aacca-4e88-4667-8792-3ed08cdd65c3_en?filename=SWD_2023_692%20Kosovo%20report_0.pdf.

153 Government of Montenegro, *Analiza o ostvarenjima i izazovima ekološke države Crne Gore (za verifikaciju)*, <https://www.gov.me/dokumenta/08ef36b7-8ba3-437d-a2c1-7f734b5e883a>.

154 Parliament of Montenegro, Constitution of Montenegro, <https://www.skupstina.me/me/ustav-crne-gore>.

155 Government of Montenegro, *Zakonska regulativa iz oblasti životne sredine*, <https://www.gov.me/clanak/119719-zakonska-regulativa-iz-oblasti-zivotne-sredine>.

156 Government of Montenegro, *Zakon o inspekcijskom nadzoru*, <https://www.gov.me/dokumenta/2d94d04d-3039-4c7d-8b9a-d2aea801f013>.

157 Paragraf, *Krivični zakonik Crne Gore*, updated 31 March 2021, <https://www.paragraf.me/propisi-crnegore/krivicni-zakonik-crne-gore.html>.

158 European Commission, Montenegro 2023 Report, 8 November 2023, https://neighbourhood-enlargement.ec.europa.eu/document/download/e09b27af-427a-440b-a47a-ed5254aec169_en?filename=SWD_2023_694%20Montenegro%20report.pdf.

159 Danka Caković, Environmental crime in Montenegro, OSCE, 2023, <https://www.osce.org/files/f/documents/c/8/570285.pdf>.

160 Milica Kandić, *Progres na pauzi: Izvještaj iz sjenke za Poglavlje 27 – životna sredina i klimatske promjene*, Green Home, January 2022–May 2023, https://www.greenhome.co.me/wp-content/uploads/2023/08/Izvjestaj-iz-sjenke_MNE.pdf.

161 Danka Caković, Environmental crime in Montenegro, OSCE, 2023, <https://www.osce.org/files/f/documents/c/8/570285.pdf>.

162 Ibid.

163 *Fale i inspektori za ekološki kriminal*, Kodex.me, 25 June 2013, <https://kodex.me/clanak/21150/fa-le-i-in-spek-to-ri-za-eko-lo-ski-kri-mi-nal>.

164 Danka Caković, Environmental crime in Montenegro, OSCE, 2023, <https://www.osce.org/files/f/documents/c/8/570285.pdf>.

165 Danka Caković, Environmental crime in Montenegro, OSCE, 2023, <https://www.osce.org/files/f/documents/c/8/570285.pdf>; Jugoslava Dukovska, Report on environmental corruption in the Republic of North Macedonia, OSCE, 2020, <https://www.osce.org/files/f/documents/5/7/527568.pdf>.

166 Government of the Republic of North Macedonia, Cooperation in strengthening environmental enforcement, 4Neworks Conference, Rome, 28–29 September 2023, <http://bit.ly/3HCaBzv>.

167 Government of North Macedonia, Кривичен Законик, <http://bit.ly/3PCRoyz>.

168 Екоцидот и официјално е ново кривично дело, правниците сметаат дека тешко ќе се докажува, Radio Mof, 17 March 2024, <https://www.radiomof.mk/ekocidot-i-oficijalno-e-novo-krivichno-delo-pravnicite-smetaat-dekateshko-kje-se-dokazhuva>.

169 Sinisa Jakov Marusic, Environmentalists want to see North Macedonia's 'ecocide' law enforced, BIRN, 9 September 2022, <https://balkaninsight.com/2022/09/09/environmentalists-want-to-see-north-macedonias-ecocide-law-enforced>.

170 Ognen Čančarevik, Експерти бараат формирање на сектор за борба против еколошки криминал од МВР, Telma, 13 May 2024, <https://telma.com.mk/2024/05/13/eksperti-baraat-formirane-na-sektor-za-borba-protiv-ekoloshki-kriminal-od-mvr>.

171 Ibid.

172 Gordana Lažetić and Elena Mujoska Trpevska, Izazovi zaštite životne sredine u Republici Severnoj Makedoniji, *Temida*, 25, 3 (2022), <https://doiserbia.nb.rs/img/doi/1450-6637/2022/1450-66372203283L.pdf>.

173 Jugoslava Dukovska, Report on environmental corruption in the Republic of North Macedonia, OSCE, 2020, <https://www.osce.org/files/f/documents/5/7/527568.pdf>.

174 European Commission, North Macedonia 2023 Report, 8 November 2023, https://neighbourhood-enlargement.ec.europa.eu/document/download/28a9322a-3f18-434e-89d2-0890c90b2f96_en?filename=SWD_2023_693%20North%20Macedonia%20report.pdf.

175 Constitution of the Republic of Serbia, 2006, https://www.paragraf.rs/propisi/ustav_republike_srbije.html.

176 See Official Gazette of the Republic of Serbia, Law on Air Protection, https://www.paragraf.rs/propisi/zakon_o_zastiti_vazduha.html; Law on Transport of Dangerous Goods, https://www.paragraf.rs/propisi/zakon_o_transportu_opasne_robe.html; Law on Soil Protection, https://www.paragraf.rs/propisi/zakon_o-zastiti-zemljista-republike-srbije.html; Law on Water, https://www.paragraf.rs/propisi/zakon_o_vodama.html; Law on Water, https://www.paragraf.rs/propisi/zakon_o_vodama.html; Law on Nature Protection, https://www.paragraf.rs/propisi/zakon_o_zastiti_prirode.html.

177 Ministry of Environmental Protection (Republic of Serbia), <https://www.ekologija.gov.rs/lat/dokumenta/medjunarodni-ugovori-i-sporazumi/medjunarodni-ugovori-i-sporazumi>.

178 Government of the Republic of Serbia, Criminal Code, https://www.mpravde.gov.rs/files/Criminal%20%20%20Code_2019.pdf.

179 *U Srbiji formirana policijska jedinica za suzbijanje ekološkog kriminala*, Radio Slobodna Evropa, 30 March 2022, <https://www.slobodnaevropa.org/a/jedinica-za-suzbijanje-ekoloskog-kriminala-i-za%C5%A1titu-zivotne-sredine-srbija-policija/31778060.html>.

180 Ministry of European Integrations (Republic of Serbia), *Vodič kroz pregovore Srbije i Evropske unije: Poglavlje 27 – Životna sredina*, <https://www.mei.gov.rs/srl/obuka/e-obuke/vodic-kroz-pregovore-srbije-i-evropske-unije/klasteri/klaster-4/poglavlje-27-zivotna-sredina>.

181 European Commission, Serbia 2023 Report, 8 November 2023, https://neighbourhood-enlargement.ec.europa.eu/document/download/9198cd1a-c8c9-4973-90ac-b6ba6bd72b53_en?filename=SWD_2023_695_Serbia.pdf.

182 *Gradani od sutra mogu da prijave ekološke probleme: Putem poziva, poruke ili gReact aplikacije*, *Telegraf Biznis*, 30 January 2022, <https://biznis.telegraf.rs/info-biz/3451651-gradjani-od-sutra-mogu-da-prijave-ekoloske-probleme-putem-poziva-poruke-ili-greact-aplikacije>.

183 Ministry of Environmental Protection (Republic of Serbia), *Putem gReact-a za dve godine stiglo gotovo 6.000 prijava građana*, 1 February 2024, <https://www.ekologija.gov.rs/lat/saopstenja/vesti/putem-greact-a-za-dve-godine-stiglo-gotovo-6.000-prijava-gradjana>.

184 UNODC, Global analysis on crimes that affect the environment – Part 1: The landscape of criminalization, May 2024, https://css.unodc.org/documents/data-and-analysis/Crimes%20on%20Environment/ECR_1.Legislative_Review.pdf.

185 Ibid.

186 Nedžad Korajlić et al, *Kriminalističko – kriminološke specifičnosti ekološkog kriminaliteta*, *Univerzitetska Hronika*, 3 (2010), <https://casopis.fmpe.edu.ba/images/casopis/3/3-11.pdf>.

187 Interview with an environmental activist in Sarajevo, 1 July 2024.

188 Interview with the Judicial Analysis and Reporting Department of the HJPC of Bosnia and Herzegovina, 29 September 2024, by email.

189 Interview with representatives of inspection institutions and activists in Sarajevo, Subotica and Skopje, June 2025.

190 Eileen Skinnider, Victims of environmental crime: Mapping the issues, International Centre for Criminal Law Reform and Criminal Justice Policy, March 2011, <https://globalinitiative.net/analysis/victims-of-environmental-crime-mapping-the-issues>.

191 Environmental Crime and its Victims Conference, 17–18 September 2012, book of abstracts, edited by Toine Spapens, Marieke Kluin and Rob White, <https://www.taylorfrancis.com/books/edit/10.4324/9781315580005/environmental-crime-victims-rob-white-toine-spapens-marieke-kluin>.

192 Eileen Skinnider, Victims of environmental crime: Mapping the issues, International Centre for Criminal Law Reform and Criminal Justice Policy, March 2011, <https://globalinitiative.net/analysis/victims-of-environmental-crime-mapping-the-issues>.

193 UNEP, Healthy environment, healthy people, <https://www.unep.org/news-and-stories/story/healthy-environment-healthy-people>.

194 UNEP, Healthy environment, healthy people, Thematic report, 23–27 May 2016, <https://wedocs.unep.org/bitstream/handle/20.500.11822/17602/K1602727%20INF%20Eng.pdf?sequence=1&isAllowed=y>.

195 WHO, Healthy environments for healthier populations: Why do they matter, and what can we do?, 2019, <https://iris.who.int/bitstream/handle/10665/325877/WHO-CED-PHE-DO-19.01-eng.pdf?ua=1>; UNEP, Six reasons why a healthy environment should be a human right, 13 April 2021, <https://www.unep.org/news-and-stories/story/six-reasons-why-healthy-environment-should-be-human-right>.

196 UNDP, *Koliko je za javnost u Srbiji važna zdrava životna sredina?*, https://www.undp.org/sites/g/files/zskgke326/files/2022-06/undp_rs%20Istra%C5%BEivanje%20

%C5%A0ta%20javnost%20u%20Srbiji%20misli%20o%20%C5%BEivotnoj%20sredini-converted.pdf.

197 UN, Universal Declaration of Human Rights, <https://www.un.org/en/about-us/universal-declaration-of-human-rights>.

198 UNEP, Landmark UN resolution confirms healthy environment is a human right, 6 December 2021, <https://www.unep.org/news-and-stories/story/landmark-un-resolution-confirms-healthy-environment-human-right>.

199 WHO, Healthy environments for healthier populations: Why do they matter, and what can we do?, 2019, <https://iris.who.int/bitstream/handle/10665/325877/WHO-CED-PHE-DO-19.01-eng.pdf?ua=1>.

200 Ibid.

201 World Bank, Western Balkans Regional AQM - Western Balkans: Report – AQM in Bosnia and Herzegovina, October 2019, <https://documents1.worldbank.org/curated/en/11728157651511584/pdf/Air-Quality-Management-in-Bosnia-and-Herzegovina.pdf>.

202 World Bank, Bosnia and Herzegovina: Macro Poverty Outlook, October 2024, <https://thedocs.worldbank.org/en/doc/d5f32ef28464d01f195827b7e020a3e8-0500022021/related/mpo-bih.pdf>.

203 WHO, Mortality rate attributed to household and ambient air pollution, age-standardized (per 100,000 population), World Bank Group, 2019, <https://data.worldbank.org/indicator/SH.STA.AIRP.P5?end=2019&start=2019&view=chart>.

204 Interview with an environmental activist in Bihać, Bosnia and Herzegovina, 15 July 2024.

205 Interview with Dejan Lekić, Former Assistant Director at Serbian Environmental Protection Agency, Belgrade, 6 February 2023.

206 Serious and Organized Crime Threat Assessment (Republic of Serbia), Environmental crime, <https://socta.mup.gov.rs/en/environmental-crime>.

207 Statistical Office of the Republic of Serbia, Adult perpetrators of criminal offences, 2023, <https://publikacije.stat.gov.rs/G2024/PdfE/G20241186.pdf>.

208 Crna Gora: Eko-tim zaključio da loša kaznena politika stimuliše štete u životnoj sredini, Antikorupcija, 23 March 2023, <https://antikorupcija.info/crna-gora-eko-tim-zaključio-da-losa-kaznena-politika-stimulise-stete-u-zivotnoj-sredini>.

209 Ministry of Justice (Republic of Albania), Criminal Code of the Republic of Albania, <https://qbz.gov.al/preview/a2b117e6-69b2-4355-aa49-78967c31bf4d>.

210 Interview with Luan Mema, environmental crime expert with the General Directorate of State Police, 5 December 2022, Tirana, Albania.

211 Public Prosecutor's Office (Republic of Albania), *Raport I Prokutorit të Përgjithshëm mbi gjendjen e kriminalitetit për vitin 2021*, https://www.pp.gov.al/rc/doc/Raporti_Vjetor_Kuvendit_per_Kriminalitetin_2021_31_03_22_PP_6411.pdf.

212 Ibid.

213 Interview with Luan Mema, environmental crime expert with the General Directorate of State Police, 5 December 2022, Tirana, Albania.

214 Interview with a representative from the Kosovo Police, 16 May 2024, by email.

215 Shkelqim Hysenaj, *Nxjerrja e zhavorrit ua merr jetën lumenjev në Kosovë*, Radio Evropa e Lire, 18 September 2022, <https://www.evropaelire.org/a/degradimi-i-lumenjeve-/32039647.html>.

216 Екоцидот и официјално е ново кривично дело, правниците сметаат дека тешко ќе се докажува, Radio Mof, 17 March 2024, <https://www.radiomof.mk/ekocidot-i-oficijalno-e-novo-krivichno-delo-pravnicite-smetaat-deka-teshko-kje-se-dokazhuva>.

217 Akademik, Инфографик – Еко криминал, 15 December 2021, <https://akademik.mk/infografik-eko-kriminal>.

218 Aleksandra Petrović, *Istrage ekocida su kao zapleti iz romana Agate Kristi*, Politika, 26 June 2023, <https://www.politika.rs/sr/clanak/559243/Istrage-ekocida-su-kao-zapleti-iz-romana-Agate-Kristi>.

219 Sladan Tomić, *Ekološke teme većinom zanimljive bh. medijima samo kad se desi incident*, Mediacentar Online, 17 June 2021, <https://media.ba/bs/magazin-novinarstvo/ekoloske-teme-vecinom-zanimljive-bh-medijima-samo-kad-se-desi-incident>.

220 Interview with Suada Numić, Federal Ministry of Environment and Tourism of Bosnia and Herzegovina, by email.

221 Interview with Sara Bosnić, Ministry for European Integration and International Cooperation of the Republic of Serbia, 7 February 2024, online.

222 Interview with Tihomir Dakić and Redžib Skomorac of the Centre for Environment, Banja Luka, Bosnia and Herzegovina, online, 5 June 2024.

223 The Resource Environmental Centre Albania, <https://rechqiperi.org>.

224 OSCE, Handbook on the competencies of the local government in preventing environmental crime, 6 May 2020, <https://www.osce.org/presence-in-albania/451606>.

225 Entenela Ndrevataj, *Jeta pranë rrjedhës së lumiit Ishëm, mes përmbytjeve dhe ndotjes nga mijëra kilogram mbetje*, Citizens, 2 February 2021, <https://citizens-channel.com/2021/02/02/jeta-prane-rrjedhes-se-lumit-ishem-mes-permbytjeve-dhe-ndotjes-nga-mijera-kilogram-mbetje>; Elira Kadriu, *Nivel i lartë i ndotjes në basenin e Ishmit rrezik për jetën e banorëve*, Citizens, 28 July 2020, <https://citizens-channel.com/2020/07/28/nivel-i-larte-i-ndotjes-ne-basenin-e-ishmit-rrezik-per-jeten-e-banoreve>; Entenela Ndevataj, *Në ujërat e lumit Ishëm lundrojnë 733.000 kg mbetje, dikur shërbente për ujë të pijshëm*, Citizens, 3 November 2020, <https://citizens-channel.com/2020/11/03/ne-ujerat-e-lumit-ishem-lundrojne-733-000-kg-mbetje-dikur-sherbente-per-uje-te-pijshem>.

226 Protest u Smederevu: Gušimo se, upomoći!, Mondo, 9 November 2018, <https://mondo.rs/Info/Drustvo/a1151351/Smederevo-Protest-ispred-Zelezare-zbog-zagadjenja.html>.

227 Interview with Anika Živanović, an activist with Pokret Tvrđava, Smederevo, Serbia, 12 November 2023.

228 Crna Gora: Eko-tim zaključio da loša kaznena politika stimuliše štete u životnoj sredini, Antikorupcija, 23 March 2023, <https://antikorupcija.info/crna-gora-eko-tim-zaključio-da-losa-kaznena-politika-stimulise-stete-u-zivotnoj-sredini>.



GLOBAL INITIATIVE

AGAINST TRANSNATIONAL
ORGANIZED CRIME

ABOUT THE GLOBAL INITIATIVE

The Global Initiative Against Transnational Organized Crime is a global network with over 700 Network Experts around the world. The Global Initiative provides a platform to promote greater debate and innovative approaches as the building blocks to an inclusive global strategy against organized crime.

www.globalinitiative.net