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Report on Advancing Regional Action on Single-Use Plastics Phase-Out and Circular Plastic Packaging Solutions in the Western Balkans Six

Contents

List of abbreviations

AFD	French Development Agency *(Agence Française de Développement)*
AI	Administrative Instruction
AKEM	Waste Economy Agency of Albania
AKM	Environment Agency of Albania
CE	Circular Economy
DRS	Deposit Return Scheme
EEA	European Environment Agency
EPR	Extended Producer Responsibility
EU	European Union
GAWB	Green Agenda for the Western Balkans
GEF	Global Environment Facility
GIZ	German Agency for International Cooperation *(Deutsche Gesellschaft für Internationale Zusammenarbeit)*
INSTAT	Institute of Statistics of Albania
KEPA	Environmental Protection Agency of Kosovo*
KfW	German Development Bank *(Kreditanstalt für Wiederaufbau)*
LSG	Local Self-Government Unit
MBT	Mechanical Biological Treatment
MEP	Ministry of Environmental Protection
MESP	Ministry of Environment and Spatial Planning
MESPI	Ministry of Environment, Spatial Planning and Infrastructure
MoFTER	Ministry of Foreign Trade and Economic Relations
MoU	Memorandum of Understanding
MRF	Material Recovery Facility
MRV	Monitoring, Reporting and Verification
MSW	Municipal Solid Waste
NECP	Energy and Climate Plan
NGO	Non-Governmental Organisation
OECD	Organisation for Economic Co-operation and Development
PAYT	Pay As You Throw
PET	Polyethylene Terephthalate
PRO	Producer Responsibility Organisation
RCC	Regional Cooperation Council

* This designation is without prejudice to positions on status, and is in line with UNSCR 1244/1999 and the ICJ Opinion on the Kosovo declaration of independence

SAA	Stabilisation and Association Agreement
SEA	Strategic Environmental Assessment
SMEs	Small and Medium-sized Enterprises
SUP	Single-Use Plastics
UNDP	United Nations Development Programme
UNEP	United Nations Environment Programme
WB6	Western Balkans Six
WEEE	Waste Electrical and Electronic Equipment

List of tables

List of figures

1. Executive summary

This report supports the Regional Cooperation Council (RCC) Secretariat in advancing a coordinated regional approach to the phase-out of single-use plastics (SUP) and the transition to circular plastic packaging across the Western Balkans Six (WB6). It is prepared under the consultancy Support to the RCC Secretariat in Advancing Regional Action on Single-Use Plastics Phase-Out and Circular Plastic Packaging Solutions in the WB6 and operationalises the 2023 Regional Joint Statement on Plastic Pollution, while aligning with key EU policy directions, including the EU Single-Use Plastics Directive, the EU Plastics Strategy and the Circular Economy Action Plan, as well as the Barcelona Convention's marine litter objectives.

The report is structured around two complementary purposes:

1. to provide a comparative regional landscape assessment of plastic packaging and SUP management, and
2. to propose common and WB6 tailored recommendations that are realistic for implementation capacity and investment conditions in the WB6.

A central finding of the analysis is that the WB6 face a dual challenge, on one hand reducing the most problematic SUP items that dominate litter streams and visible pollution, while on the other simultaneously fixing the system backbone needed to deliver circular outcomes for plastic packaging. In practice, this backbone consists of functioning Extended Producer Responsibility (EPR) systems and, where relevant, Deposit Return Schemes (DRS), sufficient collection and sorting infrastructure, and effective enforcement. The report therefore positions circular plastic packaging not only as an environmental priority but as an industrial and competitiveness issue for a region that exports packaged goods to the EU and relies on imported packaging formats and external markets for secondary raw materials. Without packaging designed for recyclability and meaningful recycled content, even major waste sector reforms will struggle to deliver measurable circularity.

The report recommends strengthening producer responsibility governance, using EPR fee modulation to reward recyclable/reusable formats and penalise problematic designs, and explicitly linking EPR/DRS spending priorities to quantified outcomes, particularly the reduction of the top five SUP items, improved recyclability, and recycled-content targets, so that financing flows directly support verified progress. It further highlights demand side levers, notably public procurement, as a practical mechanism to shift markets. Contracting authorities can embed recyclability, recycled content and SUP free requirements into tenders, and by 2028 eliminate the top five most littered SUP items from framework contracts for catering and events, translating regional commitments into routine purchasing decisions. The report emphasises regional cooperation as essential to avoid fragmented rules that increase costs for producers and importers operating across WB6 markets. Harmonised core requirements can reduce transaction costs and strengthen preparedness for EU market expectations.

A core message of the report is that the transition away from SUP and towards circular plastic packaging can and should be underpinned by viable private sector business models. The analysis identifies a wider portfolio of opportunities, but develops in detail three flagship

business cases that sit at the heart of Action 22 and are directly enabled by the proposed reforms:

- Operating a domestic DRS for beverage containers, with a single system operator financed through producer fees, unredeemed deposits and the sale of high-quality recyclate, achieving high return rates and supplying feedstock for recycled polyethylene terephthalate (rPET) and metal recycling.
- PET bottle-to-bottle recycling plants producing food-grade rPET, capitalising on EU recycled-content obligations and creating regional hubs for high-value recycling aligned with EU food-contact standards.
- Reverse-logistics providers for packaging and reusable systems, offering integrated collection, washing and logistics services for reusable cups, containers and transport packaging in hotel, restaurant and catering (HoReCa), retail and events.

The report concludes with a phased implementation pathway structured around immediate, mid-term and long-term priorities. In the immediate period (2025–2026), the emphasis is on political anchoring (Joint Statement on top five SUPs), establishing the regional platform and expert groups, and preparing a pipeline of projects linked to the business cases. In the mid-term (2027–2028), the focus shifts to translating regional frameworks into binding domestic measures, scaling EPR and DRS, rolling out reuse/refill systems in key sectors, and mobilising investment in infrastructure. By 2029–2030, the objective is to consolidate performance so that Action 22 milestones and associated key performance indicators (KPIs) are met, i.e. a drastic reduction in availability of top five SUP items, a majority of plastic packaging that is recyclable, reusable or compostable in practice, and meaningful recycled-content levels aligned with EU requirements.

2. Introduction

This report supports the Regional Cooperation Council (RCC) in advancing regional action on the phase-out of single-use plastics (SUP) and the transition to circular plastic packaging across the Western Balkans Six (WB6). It is prepared under the consultancy Support to the RCC Secretariat in Advancing Regional Action on Single-Use Plastics Phase-Out and Circular Plastic Packaging Solutions in the WB6. The assignment operationalises the 2023 Regional Joint Statement on Plastic Pollution [1], and aligns with the EU Single-Use Plastics Directive [2], the EU Plastics Strategy [3], the Circular Economy Action Plan [4], and the Barcelona Convention's marine litter objectives [5].

The assignment builds on the Leaders' Declaration on the Green Agenda for the Western Balkans (GAWB) and its 2021–2030 Action Plan [6], translating high-level commitments into concrete measures on circular economy (CE) and depollution. The 2023 Tirana Joint Statement [7] provides a clear political mandate to reduce land- and sea-based plastic pollution, develop robust EPR systems, and introduce regionally aligned reuse/recyclability requirements for plastic packaging and for accelerating convergence with the European Green Deal [8].

The report applies a mixed-methods design in three phases. Phase 1 conducts a multi-level desk review of legislation, strategies and enforcement mechanisms, benchmarking them against EU and regional commitments, and maps institutions and implementation capacities. Phase 2 co-develops harmonised policy pathways and WB6 specific roadmaps through targeted interviews, focus groups and structured validation with WB6 stakeholders. Phase 3 consolidates the recommendations, supports regional consultation, and finalises the report.

The primary audience is the RCC Secretariat and WB6 line institutions (environment ministries, environmental protection agencies and municipal authorities). Secondary audiences include PROs, waste management operators, business associations, civil society and international partners. The report's purpose is to (i) diagnose legal and institutional gaps, and (ii) recommend coordinated policy and regulatory options for SUP phase-out, circular plastic packaging and fully functional EPR, together with practical implementation pathways to support enforcement, investment and regional coordination.

3. The regional landscape related to plastic packaging

Plastic pollution is increasingly recognised not only as an environmental challenge, but also as a public health concern. Across the life cycle, production-use-disposal, plastics can release greenhouse gas emissions and introduce hazardous chemicals and micro-/nano plastics into air, water and food systems. Human exposure may occur through ingestion, inhalation and dermal contact, with growing evidence linking plastic-associated chemicals and microplastics to potential adverse effects on hormonal function, reproduction, immune response and other long-term health outcomes. This section summarises the regional landscape for plastic packaging and single-use plastics (SUP) in each WB6 across three dimensions: legislative and regulatory frameworks; strategies and implementation realities; and alignment with EU and regional commitments. The detailed insight is given in Annex 1.

Albania's framework is anchored in the Law on Integrated Waste Management and the Integrated Waste Management Plan 2020–2035, which foresee separate collection, regional waste zones and full introduction of EPR for packaging via a dedicated law. A 2022 ban on lightweight plastic bags and oxo-degradable plastics represents the first concrete SUP measure, complemented by a chemicals management law largely modelled on Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)/ Classification, Labelling and Packaging of Substances and Mixtures (CLP). In practice, recycling rates remain low, landfilling dominates and enforcement of the bag ban is uneven, with persistent leakage into rivers and the Adriatic, most visibly through the Ishmi basin. Implementation is supported by new institutions such as AKEM and substantial donor investment in regional landfills and collection systems, but separate collection and EPR are still at an early stage. It is partially aligned with the EU waste and packaging acquis and has signalled commitment to the GAWB and the Tirana Joint Statement on plastic pollution; key next steps are adoption and enforcement of the EPR law, broader SUP restrictions and operationalisation of relevant monitoring systems.

Bosnia and Herzegovina regulates waste and packaging at entity and Brcko District level, with separate laws and by-laws in the Federation of Bosnia and Herzegovina and Republika Srpska and no waste law covering the entire territory. Both entities operate EPR schemes for packaging through licensed PROs, while Brcko District has yet to establish an equivalent system. Updated rulebooks in Federation of Bosnia and Herzegovina and Republika Srpska have increased packaging recycling targets and strengthened obligations on separate collection, but historical targets were low and enforcement gaps mean that substantial volumes of packaging remain undeclared. SUP-specific measures are limited to eco-fees and retailer charges for carrier bags; broader SUP transposition and DRS introduction are still under discussion. Strategically, each jurisdiction has its own environmental and waste strategies and is preparing SUP roadmaps, but implementation is hampered by fragmented governance, weak data and limited infrastructure (e.g. lack of a glass recycling plant). As an EU candidate and GAWB signatory, it is expected to adopt a territory-wide waste strategy, transpose the SUP Directive and raise packaging recycling performance in line with EU and regional targets.

Kosovo* has recently overhauled its framework through amendments to the Law on Waste and a comprehensive Administrative Instruction on Packaging and Packaging Waste, establishing

a EPR system with full territorial coverage and a DRS for beverage containers. The same package bans the production, import and sale of plastic carrier bags, including oxo-degradable types, and introduces mandatory producer registration and reporting. The Integrated Waste Management Strategy 2024–2035 and its Action Plan translate these provisions into quantitative targets for recycling and landfill reduction, backed by a CE roadmap that highlights plastics and packaging. Implementation, however, is constrained by limited inspection capacity, low current recycling rates (around 3-4%), weak inter-municipal cooperation and fragmented data systems. It is strongly converging with EU waste and packaging law on paper and participates actively in RCC and GAWB processes; the main challenge is to operationalise EPR and DRS, build infrastructure, and create a functioning waste and packaging information system that can support regional monitoring.

Montenegro has adopted a comprehensive Law on Waste Management (2024) and a Decree on EPR (2025) that introduce producer responsibility across multiple streams and enable the future establishment of a DRS for beverage packaging. The law transposes key provisions of the EU SUP Directive by banning a range of SUP products and restricting plastic carrier bags between 15 and 50 microns, with levies on thicker bags. These reforms significantly improve legal alignment, but recycling performance remains very low and municipal systems are still dominated by mixed-waste collection and landfilling. The new EPR system is only starting to operate, municipalities require support to roll out separate collection, and regional recycling facilities are not yet in place. It has committed, through its Waste Management Plan 2025-2029, CE Roadmap and GAWB obligations, to increase recycling, phase out SUP and reduce marine litter in the Adriatic. The European Commission recognises the high level of legislative approximation while calling for accelerated implementation, further by-laws and stronger enforcement and awareness, particularly in tourism-intensive coastal areas.

North Macedonia's framework combines a Law on Waste Management with specific laws on packaging, WEEE, batteries and other streams, all gradually aligned with EU directives. Packaging waste is managed through EPR with multiple PROs and recent amendments extend producer responsibility but have also raised concerns about market fragmentation and limited oversight of PRO performance. A rulebook on plastic carrier bags and government announcements on eliminating SUP from public procurement signal initial steps towards SUP reduction. Strategically, the Waste Management Strategy, Waste Prevention Plan and a newly launched CE roadmap set out a comprehensive reform agenda, including regional waste management centres and CE measures across priority sectors. Implementation has lagged: regional systems are not fully operational, CE action is slow and inspection capacity is weak. It is advancing in EU accession and participates in the Growth Plan and GAWB, but European Commission assessments emphasise the need for stronger institutions, faster roll-out of regional waste systems and more effective EPR and SUP measures to meet EU and regional expectations.

Serbia has a relatively advanced legislative package on waste and packaging, including the Law on Waste Management, Law on Packaging and Packaging Waste and a Packaging Waste Reduction Plan for 2025-2029. Packaging EPR is well established through operators that meet recycling and recovery targets comparable to EU levels, and recent amendments clarify end-

of-waste and by-product status to support circularity. The Waste Management Programme 2022-2031 and Waste Prevention Plan set ambitious goals for municipal recycling, bio-waste treatment and reduction of unsanitary landfills. A CE development programme and roadmap identify plastics and packaging as priority sectors, backed by donor-supported initiatives and a CE hub within the Chamber of Commerce. Nonetheless, implementation gaps persist, as overall recycling rates remain modest, many landfills are non-compliant and SUP transposition is only partial, with key elements of Directive 2019/904 still to be fully reflected in law and practice. The European Commission rates legal alignment on waste as good but stresses the need to operationalise EPR across all streams, introduce DRS, fully align SUP measures and strengthen monitoring and enforcement. It is deeply engaged in the GAWB and regional CE initiatives, positioning itself as a key actor in regional plastic-packaging reforms. In addition, under the UNEP Special Programme project "Further strengthening of domestic-level capacity and risk management of substances of global concern throughout their lifecycle in Serbia", the Ministry of Environmental Protection developed an Inventory of Products Containing Intentionally Added Microplastics. Building on this project output, the Ministry of Environmental Protection of Serbia introduced regulatory bans and restrictions on microplastics in products containing intentionally added microplastics through the adoption of a by-law under the Law on Chemicals concerning bans and restrictions on the manufacture, placing on the market and use of chemicals. This by-law is harmonised with Restriction No. 78 of Annex XVII to the EU REACH Regulation.

Furthermore, the Ministry organised trainings for the recycling industry on techniques for the identification and separation of hazardous substances from e-waste plastic streams during the recycling process. It also prepared a brochure for industrial users of recycled plastic raw materials on the control of plastic raw materials using X-ray fluorescence (XRF) detectors. Consumer awareness-raising activities were also carried out by the Ministry, in cooperation with shopping malls in Belgrade, focusing on the identification of consumer products containing intentionally added microplastics and their replacement with safer alternatives. These activities included the distribution of consumer brochures. In addition, educational activities were conducted in elementary schools in Serbia on microplastics in children's toys, accompanied by the distribution of the educational handbook "Happy Planet", developed under the above-mentioned UNEP Special Programme project.

4. Common challenges and barriers

SUP management and CE advancement present cross-cutting challenges for the WB6. EU accession and GAWB have required all WB6 to adopt EU-aligned waste and SUP policies, including a 50% recycling rate by 2030. Adoption of laws and strategies has increased, but regional implementation gaps remain. Incomplete legal alignment with EU directives, weak enforcement and institutional capacity, inadequate waste infrastructure, limited financing and low public participation in waste separation are common barriers.

None of the WB6 have fully implemented the EU SUP Directive and waste legislation. Serbia has only partially incorporated the SUP Directive into its Packaging Waste Act and Bosnia and Herzegovina has only implemented a plastic bag levy and no straw or cutlery bans. Albania

banned lightweight plastic bags in 2022 and Kosovo* banned them in 2023 by packaging regulation. Montenegro's latest waste law incorporates EU norms such as EPR and SUP restrictions, including such a carrier bag levy, but secondary legislation and strict enforcement are needed. North Macedonia and Serbia have updated their waste and packaging laws to align with the EU, but most jurisdictions are still considering SUP measures like single-use item restrictions or mandatory tethered caps.

Waste management infrastructure is lacking in all WB6. Municipal waste collection has improved but is still incomplete in some areas, especially rural, and recyclables are rarely collected. Landfilling dominates disposal, with many unsanitary dumpsites. Recycling rates are well below EU averages, usually under 20%. Poor sorting and recycling infrastructure, lack of collection bins and vehicles and limited domestic recycling/reprocessing capacity are the main issues. Most municipalities collect waste in one mixed stream, making recycling difficult. Poor follow-up and low public participation have hampered dual or multi-bin separation pilot projects.

Due to low waste fees and poor citizen fee collection, municipal waste utilities are often underfunded. This limits funding for service expansion and recycling systems. All WB6 are implementing the polluter pays principle through EPR fees or eco-taxes, but they are not yet covering costs. Municipalities fund waste collection and cleanup until EPR schemes capture most producers.

Lack of economic incentives for waste reduction and recycling is another issue. In some places, mixed and sorted waste cost the same until recently and households rarely receive rewards or PAYT (pay-as-you-throw) pricing for sorting. Such conditions discourage private sector and consumer circularity. These financial barriers can be overcome by strengthening EPR fee systems, introducing deposit-refund incentives and increasing waste management budgets.

Recycling culture is weak in most WB6 societies due to decades of waste service underinvestment. Information campaigns and convenient plastic recycling options are scarce. Even with infrastructure in place, participation is low. Education and outreach are supported by all WB6 governments.

Fortunately, regional collaboration is driving SUP and CE progress. In 2023, WB6 leaders endorsed a Joint Statement on Plastic Pollution through the Berlin Process and RCC, calling for coordinated SUP reduction and improved EPR schemes. The RCC supports a Regional Action Plan on Prevention of Plastic Pollution Including Marine Litter (October 2025). This regional momentum complements EU accession incentives and can help overcome WB6 level barriers by sharing expertise and standards.

The table below lists major challenges for each WB6, including common and unique obstacles.

Table 1. Comparative overview of key SUP/CE challenges in the WB6

Area	Albania	Bosnia and Herzegovina	Kosovo*	Montenegro	North Macedonia	Serbia
Legislation	Partial alignment Banned plastic bags (2022) Draft EPR law pending	Decentralised entity laws Packaging EPR in Federation of Bosnia and Herzegovina and Republika Srpska SUP Directive largely not transposed (only bag levy)	New 2023 packaging / SUP regulation incl. bag ban Strong legal framework adopted	New Waste Law (2024) aligns with EU norms (EPR, some SUP restrictions) By-laws and full SUP Directive transposition still needed	Updated waste laws (2021) and CE roadmap Packaging law since 2010 (EPR in place) Some SUP measures (e.g. govt pledge to avoid SUP) but no comprehensive SUP law yet	Modern waste and packaging laws Partial SUP Directive transposition under Packaging Waste Act
Implementation	Weak enforcement of bans (bag ban compliance issues) Recycling targets missed New waste agency (AKEM) set up to improve oversight	Enforcement inconsistent due to complex governance, many producers evade EPR (free riders) Oversight split between entities Limited inspections	Implementation lagging: laws in force but infrastructure and compliance not yet in place Limited inspectorate capacity Data systems fragmented	Slow implementation of new rules, need to enforce separate collection by municipalities, limited inspection capacity at local level, Eco-Fund to support compliance	Gaps in enforcement and monitoring Few incentives for municipal compliance Waste separation mostly voluntary	Enforcement improving but still weak at local level Environmental duties split across agencies Many illegal dumps persist despite regulations
Infrastructure	Limited sorting & recycling facilities Mostly landfilled Some new regional landfills under development with donor support	Insufficient infrastructure Most waste landfilled or dumped Separate collection just starting	Very weak infrastructure for recycling Plans for regional MRFs and composting, but financing delays	Few recycling centres Mostly mixed waste collection Delays in planned regional landfills	Almost all waste landfilled (negligible recycling) Shortage of collection infrastructure (few recycling bins/ reverse vending machines (RVMs)) Beginning to regionalise landfills	Many non-compliant landfills still in operation Expanding sanitary landfills with EU support, but separate collection limited in practice
Public participation	Growing interest but recycling culture weak Source separation rare Campaigns needed to support new initiatives	No widespread incentive for citizens to return plastics (no DRS yet)	Public not well informed on new systems, current participation in recycling very low	Low motivation for sorting (no incentives)	Recycling seen as individual effort	Moderate awareness, but convenience of disposal wins out

Area	Albania	Bosnia and Herzegovina	Kosovo*	Montenegro	North Macedonia	Serbia
Key quantitative indicators	Municipal waste collection coverage: approx. 89% of the population (INSTAT, Urban Solid Waste 2023/2024) Recycling rate of municipal waste: approx. 18.8% in 2023, showing stagnation and a slight decline compared to 2022 Energy recovery/incineration: increased modestly to around 4.6% in 2023 Separate collection: still very limited, with no system in place for packaging waste throughout Albania Domestic targets (Integrated Waste Management Plan 2020–2035): Packaging waste: ≥30% recovery by 2030, 60% by 2035 EPR system: not yet operational (law pending full implementation	In Federation of Bosnia and Herzegovina new packaging waste rulebook increased packaging recycling target from 37% to 45% until 2027 In 2021, Federation of Bosnia and Herzegovina achieved only 16% recycling of packaging waste, 20% in Republika Srpska in 2018 Ekopak (PRO for packaging waste in Federation of Bosnia and Herzegovina) has recycled over 150,000 tonnes of packaging in 13 years and expanded separate collection to all 10 Federation of Bosnia and Herzegovina cantons Over 50% of packaging placed on the market is estimated to may go unreported by free riders who evade EPR requirements	Estimated recycling rate of municipal waste: 3% of total municipal waste generated is recycled (KEPA estimate cited in domestic reports; no verified packaging-specific rate available) Dominant treatment method: >90% of total municipal waste disposed in landfills Packaging waste management: No operational EPR system for packaging DRS: Legal basis adopted, system administrator not yet appointed, no pilot phase launched Plastic bag reduction measures: mandatory charge introduced, high compliance among large retailers, lower compliance among small and informal retailers Strategic SUP / packaging targets	As of 2023, less than 15% of total waste in Montenegro was recycled Municipal public utility companies handle about 90% of waste collection, serving roughly 88% of the population The government adopted 21 implementing acts As from October 2024, it started to implement the ban on placing plastic bags with a thickness of 15-50 microns and the use of SUP products Packaging waste recovery and recycling targets are being updated to meet EU levels (with new targets for recycling plastic packaging likely around 50–55% by 2025–2030, in line with EU Directive 94/62/EC).	Is working to harmonise its legislation with the EU acquis while also transitioning towards a regional waste management system based on regional waste management centres, including new infrastructure such as sanitary landfills and mechanical-biological treatment plants The government announced that as of 2020 it will no longer procure plastic products and single-use packaging The Plan for Waste Prevention (2022–2028) sets out specific measures for the public and private sectors to reduce waste and promote a CE. Waste prevention is an integral part of the comprehensive transformation towards a CE The strategies for waste management and sludge management still need to be adopted	The Waste Management Programme 2022-2031 in line with EU policies ·Increase the recycling rate of municipal waste to a total of 25% by weight by 2025 and 35% by 2030 ·Increase the rate of preparation for reuse and recycling of municipal waste to a minimum of 55% by weight by the end of 2025 and a minimum of 60% by weight by the end of 2030 ·Increase the bio-waste recycling rate to 20% by 2025 and 40% by 2029 ·Increase the recycling rate of paper and cardboard to 25% by 2025 and 35% by 2029 ·Reduce waste disposal in unsanitary landfills to 0% by 2034 Key regulations include the Waste Prevention Plan adopted in March 2025, which sets objectives and measures for the period 2022-2031, and mandates legal entities to adhere to specific rules for waste

Area	Albania	Bosnia and Herzegovina	Kosovo*	Montenegro	North Macedonia	Serbia
	through secondary implementing decisions)		(Integrated Waste Management Strategy): – 50% recycling rate for municipal waste by 2035 – Progress dependent on EPR and DRS activation		Implementation of the CE is stagnating. Limited stakeholder awareness and knowledge, insufficient financial means and infrastructure limitations continue to be the main challenges The EPR has not yielded the anticipated improvements and continues to face a range of persistent challenges The Roadmap for a CE, developed with support from the EU and OECD and launched in March 2024, outlines over 40 policy recommendations across five key sectors. The roadmap aims to establish a robust policy framework to guide the North Macedonia's transition, building on existing strategies such as the Law on Waste Management (2021) and Plans for Waste Management and Prevention	management, such as contracting with licensed operators for packaging waste. Serbia has developed a roadmap for the CE, recognising plastics and packaging as one of four priority sectors for improvement. CE principles play an essential role in the transition to a green economy. The SUP Directive has received partial transposition under Serbia's Packaging Waste Act, nevertheless, comprehensive alignment with EU standards remains outstanding. A report from the Statistical Institute stated that 67,355 tonnes of non-hazardous plastic waste were generated in 2023 in Serbia, of which 56,513 tonnes were successfully recycled.

5. Regional and tailored recommendations

5.1. Critical assessment of EPR and DRS schemes

Progress on EPR for packaging waste remains uneven across the region:

Bosnia and Herzegovina

North Macedonia

Serbia

Albania

Kosovo*

Montenegro

The WB6 have EPR laws in place; however weak enforcement, poor PRO transparency, unreliable data, limited infrastructure and low public participation mean these systems are not delivering. The Common Regional Market (CRM 2.0) can tackle these structural gaps by aligning rules with the EU, improving intraregional logistics, digitalising traceability and making it easier to move and use recycled materials. If WB6 level EPR systems are aligned through the CRM, the region can cut compliance costs, build viable regional recycling chains and roll out coordinated deposit-return schemes, starting with packaging, textiles and metals.

All WB6 recognise EPR as a cornerstone of sustainable plastics management and several are exploring DRS for beverage containers to curb plastic pollution. In principle, EPR shifts the responsibility (financial and organisational) for post-consumer waste from municipalities to producers, while DRS offers a direct incentive for consumers to return bottles and cans.

Most WB6 now have laws on the books establishing EPR for packaging waste, aligning with the EU Packaging and Packaging Waste Directive's requirements for producer responsibility. However, the effectiveness of these schemes varies. Early adopters like North Macedonia, Serbia and Bosnia and Herzegovina introduced packaging EPR roughly a decade ago, but their systems have struggled with low targets and patchy compliance. Newcomers (Kosovo* and Montenegro) have recently enacted modern EPR legislation (2023–2024) that closely follows EU norms, though practical implementation is just beginning. Albania is on the verge of establishing its first comprehensive EPR framework via a draft law, aiming for full EU alignment.

DRS schemes, which are mandated by the EU SUP Directive for achieving a 90% collection rate of plastic bottles by 2029, are largely still in the planning or pilot stage in the WB6. Kosovo* is leading the way as the first to embed a WB6 level DRS for beverage containers into law (adopted in 2023). Serbia and Montenegro have announced plans or legal provisions for future DRS implementation, while Albania, Bosnia and Herzegovina and North Macedonia have not yet established formal DRS, though all acknowledge its potential benefits. The next step region-wide is to operationalise these EPR and DRS mechanisms fully, moving from legal frameworks to functioning systems on the ground. This includes setting up PROs, rolling out collection infrastructure (e.g. return vending machines for DRS) and creating transparent monitoring and reporting systems to track progress.

On paper, the WB6 are gradually aligning their waste legislation with EU directives. All six have incorporated the polluter-pays principle and some form of EPR for packaging into law.

For instance, Bosnia and Herzegovina's entities require producers to join a PRO or pay fees to environmental funds, and North Macedonia's 2010 Packaging Waste Law introduced producer responsibility (with later updates). Kosovo*'s 2023 Administrative Instruction on Packaging Waste is explicitly modelled on EU regulations, transposing key elements of the EU Packaging and SUP directives (including a DRS mandate). Montenegro's 2023 Law on Waste Management likewise embeds EPR and empowers the government to set up a DRS for beverage packaging. Albania's draft EPR law, once passed, will close a major gap by legally obliging producers of packaging, WEEE, batteries, etc., to organise waste management and meet targets. In terms of SUP-specific legal alignment, progress is uneven. Some WB6 (Albania, Kosovo*) have outright plastic bag bans aligning with EU goals, whereas others (Serbia, Bosnia and Herzegovina, North Macedonia) have only partial measures so far. Importantly, no WB6 has a fully operational SUP Directive transposition yet, but all have signalled intent to adopt the remaining measures. The legal basis for DRS exists now in at least three WB6 (Kosovo*, Montenegro, Serbia), creating the foundation for future implementation.

A major element of EPR/DRS schemes is how they are financed and whether they are economically sustainable. Under EPR, producers typically pay fees based on the amount and type of packaging they put on the market. These fees either go to PROs (which then finance collection/recycling and awareness) or to supreme environmental funds if producers do not join a PRO (as in the Bosnia and Herzegovina model). In the WB6, the fee levels and coverage vary. WB6 with established PROs (North Macedonia, Bosnia and Herzegovina, Serbia) often set relatively low targets historically, which meant lower fees and limited funds, insufficient to overhaul waste systems. New regulations are raising targets and fees, which should increase the financial contributions of producers. Ensuring all obligated companies actually pay is an area of concern. However, improving registration and reporting (through packaging registries and digital systems) is underway in some WB6, notably Kosovo*, to combat free riding.

For DRS, the financial model typically involves a refundable deposit paid by consumers at purchase and returned upon container return, plus non-refundable producer fees or unredeemed deposits that cover system costs. In Kosovo*'s nascent DRS, the 2025 amendment introduced specific handling fees and ensures consumers can get refunds without proof of purchase (to maximise returns). It also contemplates a government-backstop operator to ensure continuity. Other WB6 will need to determine deposit values (often around 0.10 EUR) and how to fund start-up investments (RVM machines, logistics). International donors may support initial capital costs, but long-term DRS operations should be self-financing through deposit revenues and producer contributions. A challenge in WB6 is keeping the system economically viable given smaller market sizes and potential fraud or smuggling (e.g. intraregional movement of containers for refunds). Robust tracking (e.g. barcode systems) and public awareness will be key, as noted in regional plans for harmonised EPR/DRS systems.

Table 2. DRS schemes comparison

WB6	DRS Policy Status	Implementation
Albania	No DRS legislation in place	Not implemented yet
Bosnia and Herzegovina	No DRS legislation in place	Not implemented yet

WB6	DRS Policy Status	Implementation
Kosovo*	DRS mandated for PET, glass and aluminium drink containers 0.15 – 2.0 l. Regulations (2025 amendment) detail operations (producer categories, handling fees, etc.)	In progress
Montenegro	The new waste law (2024) gives government authority to create a DRS for beverage packaging. No specific regulations issued yet.	Not yet implemented
North Macedonia	No DRS legislation in place	Not yet implemented
Serbia	Drafted provisions for a DRS for packaging.	Not implemented yet

Table 3. EPR schemes comparison

WB6	Legal framework	Implementation	Financial mechanism
Albania	Draft law (pending adoption)	Not yet operational	Planned producer fees per packaging placed on market
Bosnia and Herzegovina	Entity-level regulations in place since 2011/2018, EPR for packaging required via PRO or payments to env. funds SUP Directive not fully transposed yet (bag levy only)	Partially operational Multiple PROs active (non-profit) in Federation of Bosnia and Herzegovina and Republika Srpska contracting with producers Enforcement issues with many producers not participating	Producers pay PRO fees, if not, higher fees to entity Environmental Funds (polluter-pays) Funds used for recycling projects via PROs and Environmental Protection Funds
Kosovo*	Administrative Instruction (2023, 2025) establishes full EPR for all packaging, in line with EU Waste Framework and Packaging Directives Includes SUP bans (bags) and obligations for producers (registration, reporting)	Just launching Legal framework is in force, PROs for packaging, WEEE, etc. being formed	Producers to pay fees to authorised PRO(s) Fees and any non-compliance penalties fund the collection/recycling system Government oversight to ensure fees cover costs
Montenegro	Law on Waste Management (2024) mandates EPR for packaging and other product streams, aligning with EU norms By-laws to detail implementation are being prepared	Early implementation Transition period where municipalities still manage packaging waste until PRO systems fully operational	Producer fees introduced (e.g. packaging fees) to be collected via PROs or Eco-Fund Eco-Fund will channel fees such as the plastic bag levy to support waste reduction projects
North Macedonia	Law on Packaging and Packaging Waste (2010, 2021) established EPR SUP Directive not yet fully transposed	Operational for years At least one PRO (Pakomak) collects packaging waste on behalf of producers	Producers pay fees to PRO based on packaging volumes PRO finances collection, sorting, and recycling initiatives Some producers may self-comply by contracting waste handlers
Serbia	Packaging Waste Law and by-laws incorporate EPR SUP Directive partially transposed	Operational and several PROs active	Producers contribute fees through PROs or directly for waste management of their packaging The system includes modulated fees (higher for non-recyclable packaging) Environmental Fund plays a role for certain streams

The introduction of EPR and DRS in the WB6 is a positive step towards a CE, but the impact will depend on execution. Legal alignment with EU norms is on track is some WB6, but the more pressing challenge is turning those laws into operational, self-sustaining systems. This

requires political will, administrative capacity and stakeholder cooperation (governments, businesses, and citizens). For EPR, that means registering all producers, preventing free-riding, and investing EPR funds transparently into collection and recycling improvements. For DRS, it means carefully designing the system to be user-friendly and economically viable, as well as educating the public to participate from day one.

5.2. High priority SUP for phase-out

The prioritisation presented here draws on findings of previous chapters, together with findings from the online questionnaire and interviews. While legal frameworks differ in detail and in the pace of transposition, stakeholders in all WB6 converge around a relatively narrow group of SUP items that dominate visible litter, municipal waste flows and tourism-related pollution, and for which technically feasible alternatives already exist. These products therefore represent the most promising entry point for a regionally coordinated phase-out agenda. The prioritisation in this chapter is based on four main criteria that recur in the baseline report and stakeholder inputs:

- Volume and visibility in waste streams and litter
- Environmental and socio-economic impact
- Availability of substitutes and system solutions
- Alignment with EU and regional commitments

The online questionnaire, which collected 30 responses, reinforced these criteria by asking stakeholders to rank the most problematic SUP items and to indicate which incentives would be most effective. Interviews then provided qualitative depth, especially on tourism-intensive hotspots, enforcement realities, and the behaviour of retailers and households. The questionnaire also revealed how stakeholders perceive market readiness to find alternatives for different SUP products. Most respondents consider plastic bags to have best alternative products, followed by cups for beverages, and food and beverage containers. Cigarette buds are recognised to have least available alternatives, followed by ballons and wet wipes.

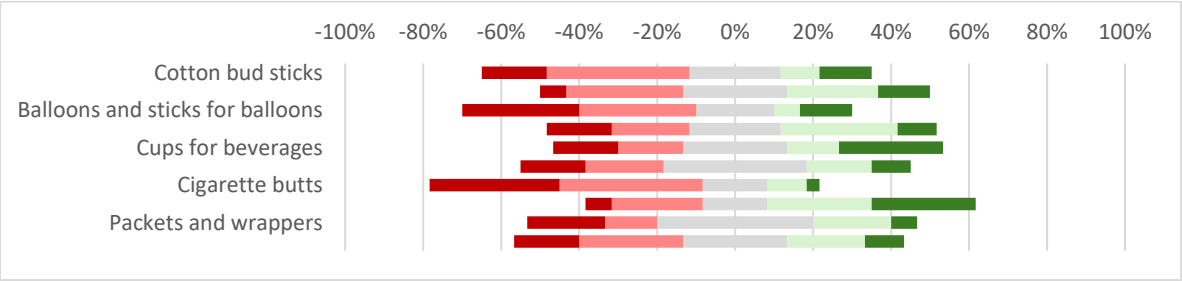
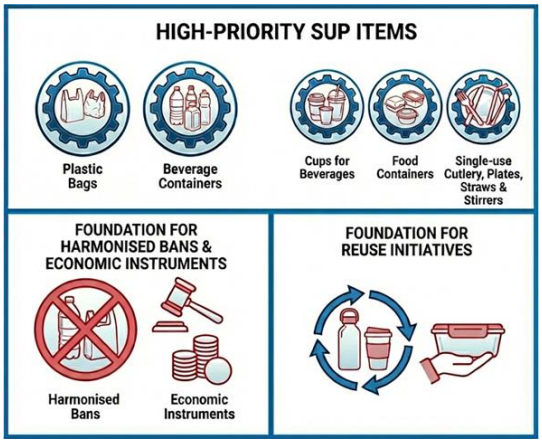


Figure 1. Current market readiness and economic viability of readily available alternatives to SUP items (CETEOR, 2025)

Although the available evidence is uneven across WB6, the convergence around a small number of product groups is evident. WB6 most commonly flag plastic bags, beverage containers, cups for beverages, food containers and single-use cutlery, plates, straws and stirrers as top-priority items, with tourism and urban consumption acting as key drivers of visible pollution and municipal costs.

In Bosnia and Herzegovina, North Macedonia and Serbia, legal transposition of the SUP Directive is incomplete, and bans on classic SUP items are still under discussion or only partially implemented. In these WB6, the full set of EU-listed SUP items will need to be addressed over time, but these five priority groups – bags, beverage containers, cups for beverages, food containers and single-use cutlery, plates, straws and stirrers – are likely to account for the bulk of environmental impact and should therefore be prioritised in the first wave of measures.

Montenegro already banned a first set of SUP items, so its priority now lies in tightening enforcement, addressing shifts towards thicker bags, and preparing systemic tools such as EPR and DRS for non-banned packaging. Albania and Kosovo*, by contrast, still need to consolidate recent bag bans and finalise EPR and DRS frameworks.



In this context, a regionally agreed core list of high-priority SUP items centred on plastic bags, beverage containers, cups for beverages, food containers and single-use cutlery, plates, straws and stirrers would provide a practical foundation for harmonised bans, economic instruments and reuse initiatives. It would also create a coherent signal to producers, retailers and investors that the WB6 are moving in the same direction, even if the exact timing and implementation pathways differ.

Plastic bags

Plastic bags are identified as a priority across the region. All WB6 have already introduced bans or restrictions on lightweight plastic bags, yet enforcement gaps and continued availability of non-compliant bags mean that bags remain a major component of the plastic waste stream. In Albania, stakeholders underline that plastic bags, together with bottles and cutlery, make up the largest share of plastic waste and continue to be widely used despite the 2022 bag ban.

Montenegro provides a cautionary example of unintended shifts within the same product group. Interviews describe plastic bags as the number one problem, noting that the ban on bags between 15 and 50 microns initially reduced volumes, but many retailers have since switched to thicker bags, likely increasing total plastic tonnage even as nominal compliance with the letter of the law is maintained. As inspection pressure has weakened, bag consumption has started to rise again, particularly in tourism-driven coastal municipalities.

Given this evidence, carrier bags should sit at the core of any regional list of high-priority SUP items. Phase-out measures will need to combine clear and enforceable bans on specific thickness ranges with broader economic instruments and reuse options, so that the market does not simply migrate to heavier but equally problematic alternatives.

Beverage containers

Beverage bottles, particularly PET bottles for water, soft drinks and juices, are another SUP category that cuts across all WB6. Questionnaire respondents from Kosovo* ranked PET beverage bottles as the single most frequently cited priority item, followed by plastic bags and takeaway packaging.

Montenegro's interviews draw similar parallels from a tourism and HoReCa perspective. The interviewees emphasised that many of the small SUP items, such as cutlery and certain small products, have already been banned from the formal market, whereas beverage bottles and associated plastic packaging now represent the most problematic products in practice, especially during the tourist season when municipal services cannot keep up with increasing waste volumes. Bottles and packaging frequently end up on beaches, in illegal dumps or unmanaged areas despite existing general waste regulations.

Deliverable 1 shows that none of the WB6 have yet implemented a fully functional DRS for beverage containers and that recycling rates remain far below EU averages. Stakeholder surveys and interviews frequently highlight regional or WB6 level DRS schemes as one of the most impactful measures that could be adopted by 2030, underscoring the strategic importance of tackling beverage bottles early in the SUP phase-out sequence.

Food containers

The third group of high-priority SUP comprises takeaway food packaging. In Albania, stakeholders explicitly single out plastic bottles, cutlery and bags as the most problematic SUP items. In Kosovo*, takeaway packaging appears as the third most frequently listed priority group.

Montenegro's tourism-driven economy amplifies this pattern. Interviews emphasise that cups, stirrers, small sticks, takeaway food containers, bowls and trays are major contributors to litter and beach pollution, particularly in coastal areas where consumption is concentrated and municipal collection systems are overstretched. Although some of these items are formally covered by existing SUP bans, stakeholders report that certain cups and bowls still appear on the market, pointing to enforcement gaps and possible ambiguities in how material types and product categories are defined.

Given their ubiquity, visibility and strong link to tourism and urban consumption, takeaway food and drink packaging are also a high priority. Here, phase-out should combine outright bans on specific problematic formats with incentives and infrastructure for reuse and refill schemes, particularly in HoReCa and high-footfall urban locations.

Cups for beverages

Cups for hot and cold drinks are a prominent and growing single-use item across all WB6. They are closely associated with on-the-go consumption in cafés, kiosks, petrol stations, festivals and tourism hotspots, and are increasingly linked to delivery platforms and takeaway services. Even where some cup formats are nominally covered by SUP-related measures, disposable cups and lids remain a common

feature of street litter. In practice, many cups marketed as ‘paper’ still contain a plastic lining or plastic components (lids, coatings, stirrers), which means they behave like other plastic products once discarded and are rarely recycled in existing municipal systems. Sorting facilities in the region are not designed to separate composite cups, and the volumes collected in mixed waste streams are too small and too contaminated to support dedicated recycling.

From a policy perspective, beverage cups are important for at least three reasons. First, they are highly visible and symbolically powerful. Many studies in EU reveal that they are one of the most frequently observed items in litter audits and clean-up campaigns in European urban and coastal areas, and interviewees consistently mention cups alongside bottles, bags and food containers as a major nuisance for public spaces. Second, they are directly linked to consumption habits that can be influenced by relatively simple interventions. Third, technically feasible alternatives already exist at scale such as reusable cups for on-premises consumption, deposit-based cup pools for events and large venues, and well-designed paper or fibre-based cups for specific use cases where reusables are not yet practical.

Cutlery, plates, straws and stirrers

Single-use cutlery, plates, straws and stirrers are among the most recognisable classic SUP items, widely used in fast food, catering, events, street food and informal hospitality. Their small size and low weight make them particularly prone to littering and wind dispersal, so they are frequently found in parks, along rivers, on roadsides and on beaches after public events or the tourist season. Beach clean-up campaigns across Europe regularly rank this group of items among the most commonly collected plastic fragments, and stakeholder interviews in the region confirm that.

Montenegro is frequently cited as an example where classic plastic cutlery and straws largely vanished from supermarkets and cafés once bans entered into force. At the same time, stakeholders continue to report residual availability through online platforms, intraregional shopping and smaller, less formal vendors, as well as ambiguous products that mimic the look of plastic but are marketed as ‘eco’ without clear certification.

This product group is strategically important for the overall SUP agenda, as it is strongly associated with throwaway culture in the public debate, and its removal can send a clear signal that a shift towards reuse is under way. Second, technically and economically viable alternatives already exist. Reusable tableware can be introduced in many settings, especially where food is consumed on the premises or within organised venues, wooden or fibre-based single-use items can be used in specific contexts where reusables are not yet feasible, and, for straws in particular, simple avoidance (serving drinks without a straw by default) is often possible. Third, replacing this group has limited structural impact on food safety or logistics compared with more complex packaging formats, which makes it suitable for decisive and early phase-out.

To lock in progress across the WB6, governments should focus on maintaining and, where needed, strengthening market restrictions for plastic cutlery, plates, straws and stirrers, and on closing loopholes in definitions and customs controls that allow non-compliant products to

enter the market. Event organisers and catering companies should be explicitly targeted through guidance and permitting conditions that favour reusable solutions as a default, backed by practical examples of how to organise washing and logistics. Complementary communication measures, especially aimed at organisers of public events, smaller food outlets and seasonal vendors, will help to ensure that the move away from these items becomes an accepted norm rather than a temporary compliance exercise. Over time, this group can serve as a showcase for how bans, economic incentives, reuse systems and awareness-raising can work together to eliminate a class of unnecessary single-use plastics from everyday life in the region.

5.3. Recommendations for phasing out high priority SUPs

The recommendations build directly on the analytical work presented in previous chapters, which provide a structured overview of the regulatory context, the current legal and policy frameworks in the WB6 and the main implementation gaps along the plastics value chain. The overall purpose is to propose a set of regional and WB6 specific recommendations that can guide RCC and domestic authorities in aligning with the EU acquis, implementing the GAWB and following up on the Tirana Joint Statement on plastic pollution.

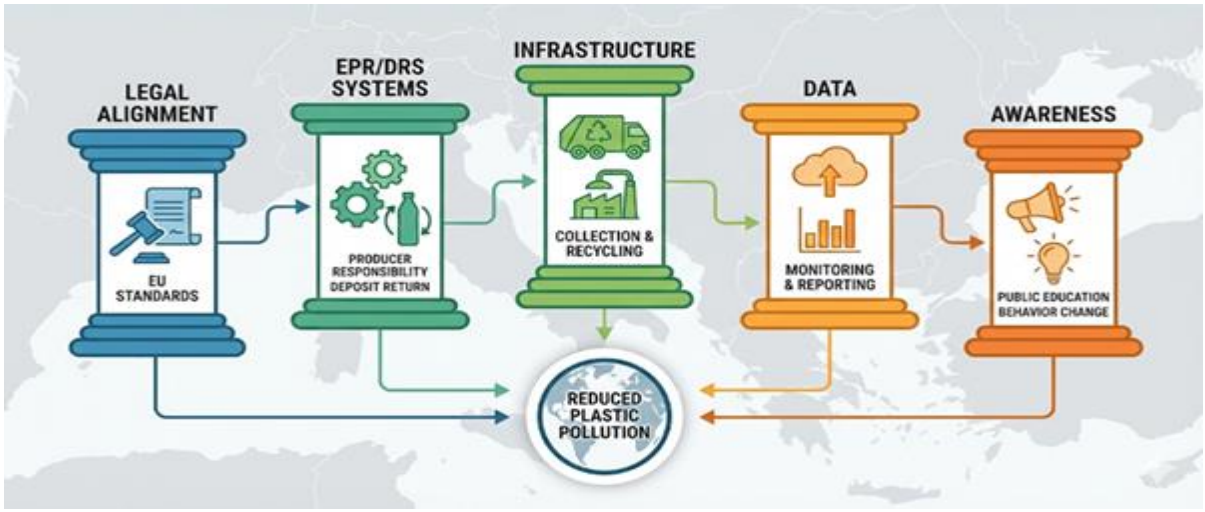
The recommendations are grounded in three complementary types of evidence. First, it was identified where each WB6 stands in relation to the EU SUP Directive, the broader packaging and packaging waste acquis and relevant CE policies, and where the main gaps lie in legislation, enforcement, data, infrastructure and market development. Second, a structured online questionnaire was circulated to stakeholders across WB6. A total of 30 responses were received. Third, a series of interviews was carried out with key stakeholders in WB6. Issues identified in Deliverable 1, the questionnaire and the interviews were first grouped under a limited number of themes. Within each theme, the team distinguished problems that appear in most or all WB6 from those that are specific to individual WB6. For example, weak inspection capacity and incomplete packaging data are common across the region, whereas the entity structure of Bosnia and Herzegovina and the ban of SUP in Montenegro are clearly WB6 specific particularities.

5.3.1. Recommendations at regional level

Regional action on SUP and circular plastic packaging is essential if the WB6 are to move from fragmented efforts to a coherent transition pathway aligned with the EU Green Deal, the SUP Directive and the GAWB. The advanced assessment in this report shows that all WB6 face similar structural challenges: incomplete transposition of SUP requirements, underperforming or nascent EPR systems, absence or early-stage development of DRS schemes, weak data and enforcement, and limited infrastructure for high-quality recycling and reuse. Stakeholder interviews and the online questionnaire further underline that many of these barriers are regional in nature, with businesses operating across the region and packaging flows moving intraregional long before they reach waste facilities.

Against this backdrop, the following regional recommendations focus on measures that clearly benefit from RCC facilitation. They are designed to complement, not replace, WB6 specific roadmaps. They aim to create an integrated regional framework for SUP phase-out and circular

plastic packaging, while respecting different starting points and administrative structures in the WB6.



1. *Establish a coordinated regional framework for SUP phase-out and circular plastic packaging*

WB6 should coordinate the phase-out of priority SUP products through a joint regional roadmap, aligned with EU requirements and the GAWB. RCC should facilitate agreement on common definitions (e.g. single-use, reusable, recyclable), promote mutual recognition of domestic measures, and provide targeted technical support where progress is slower. The joint regional roadmap should focus on a limited number of high-impact SUP items to enable early and visible regional results.

2. *Strengthen and harmonise EPR implementation across the region*

To address free-riding and uneven performance, core EPR requirements should be aligned at regional level. This includes mandatory producer registration through a shared registry, harmonised reporting formats, and common principles for fee modulation that reward recyclable and reusable packaging. Minimum regional performance benchmarks should guide domestic targets, while detailed system design remains at WB6 level.

3. *Develop a regionally aligned DRS framework for beverage containers*

A common regional approach to DRS should ensure compatibility between domestic systems. This includes agreement on a minimum deposit value, basic operational standards for return and clearing systems, and a phased rollout starting with pilot WB6. Clear alignment between DRS and EPR roles is essential to avoid overlap and reduce future adjustment costs as systems expand.

4. *Introduce regional standards for recyclability, recycled content and reuse systems*

The region should agree on minimum criteria for design-for-recycling and recycled-content requirements for priority plastic products. Common metrics and basic labelling principles for reuse systems would support market uptake and intraregional circulation of compliant

packaging, while providing greater legal and market certainty for producers and retailers operating across the WB6.

5. *Strengthen monitoring and data systems through a harmonised WB6 reporting framework*

RCC should coordinate a regional reporting framework with harmonised indicators, definitions and timelines. Domestic focal points should ensure validated submissions, supported by routine auditing of core EPR and DRS datasets. A regional dashboard and annual monitoring report should enable benchmarking, consistent progress tracking and evidence-based policy adjustment.

6. *Build regional capacity for enforcement and institutional cooperation*

Joint training and cooperation mechanisms should support inspectorates, customs and other enforcement bodies in addressing non-compliant products, free-riding and illegal waste movements. Exchange programmes and shared technical support would help reduce capacity gaps, particularly where enforcement challenges have an intraregional dimension.

7. *Promote regional investment in recycling, reprocessing and reuse infrastructure*

A regional assessment of infrastructure gaps should guide investment priorities, especially where facilities can serve multiple WB6. RCC should support coordination between public authorities, development finance institutions and private investors, and encourage pilot projects for reusable packaging systems, prioritising investments that improve regional material flows and reduce reliance on disposal.

8. *Coordinate regional awareness and behaviour-change campaigns on priority SUP items*

Regional coordination of awareness campaigns should focus on the SUP items with the highest impact, using consistent messaging and shared materials. Monitoring campaign outcomes would support adjustments over time and reinforce domestic efforts, increasing the visibility and credibility of regional action on plastics.

5.3.2. Recommendations at each WB6 level

As it was stated in the Report on the Implementation of the Green Agenda for the Western Balkans Action Plan (GARI) [9], the key recommendations for WB6 level are as stated below, while more detailed insight is given in Annex 2:

- Continue modernising legal and regulatory frameworks to achieve full compliance with the EU acquis, particularly the Waste Framework Directive and Directive 2006/21/EC on the management of waste from extractive industries.
- Enhance stakeholder engagement and raise public awareness, recognising their importance across all phases of mining activities.
- Promote the comprehensive and consistent application of relevant standards and regulations.

- Strengthen the implementation of the Aarhus Convention in the context of mining operations, with a view to improving transparency, public participation, and access to justice in environmental matters.
- Promote the development of a regional industrial policy to support the WB6's integration into European industrial ecosystems. This may include technical standards alignment, use of EU funding instruments to develop industrial clusters, promotion of public-private partnerships for knowledge exchange, and workforce development consistent with EU priorities. According to the CRM 2.0, these efforts are key for enhancing regional industrial competitiveness and meeting the evolving demands of integrated European markets.
- Adopt Geographic Information Systems (GIS) and artificial intelligence technologies to improve the accuracy and reliability of waste data monitoring and analysis.
- Strengthen cooperation with financial institutions to secure the investments required for upgrading and expanding waste management infrastructure across the region.
- Facilitate the establishment of public-private partnerships and enhance the involvement of citizens and non-governmental organisations to foster robust and inclusive sustainable waste management systems in the WB6.
- Stimulate consumer demand for sustainable products and support businesses in their transition to CE models by addressing key barriers: 1) environmental compliance challenges, 2) increased operational costs, 3) limited access to raw and secondary material supply, and 4) ingrained consumer purchasing behaviours.
- Integrate green practices and CE principles into existing funding mechanisms to enhance circularity and SMEs greening.
- Promote the eco-design and eco-labelling of products to drive sustainable production and informed consumer choices.
- Introduce practical educational programmes on CE at secondary education and university levels, ensuring that the future workforce is adequately equipped for green transitions.

For each specific WB6, this translates to recommendations given in the table below.

Table 4. Comparative table of recommendation per WB6

Area	Albania	Bosnia and Herzegovina	Kosovo*	Montenegro	North Macedonia	Serbia
Legislation	To adopt missing legal acts Use forthcoming secondary legislation to define a clear list of banned or restricted products and timelines that prioritise high-impact items	Fragmentation shapes every aspect of plastics and packaging policy EPR schemes operate separately in the Federation of Bosnia and Herzegovina and Republika Srpska, while Brcko District still lacks a comparable mechanism	Aligned legal frameworks with EU, EPR and DRS established	The 2024 Waste Law and accompanying EPR decree provide a solid legal basis for EPR and a future DRS, and a broad set of SUP bans has been introduced	Adapt the regulatory framework to local conditions Fromal legal framework, largely EU-harmonised Weak implementation, persisting governance issues	Adopt missing legal acts finalise and adopt a Strategy on SUP
Implementation	EPR Law (Law No. 57/2025) and its implementing decisions must move from text to practice, with clear accreditation of PROs, transparent fee structures and robust compliance monitoring for producers and municipalities Empower institutions with mandates, training and data tools	Harmonise SUP transposition across entities and Brcko District via a jointly agreed roadmap	Finalise guidelines, fee structures and reporting formats Mandatory producer registration Enforcement capacity needs to be strengthened through a coordinated domestic mechanism that links MESPI, market and environmental inspectorates, customs and municipalities	Operationalise the new EPR system so that it becomes a predictable, performance-based financing mechanism Make new EPR a performance-based financing mechanism with clear rules for PRO	Strengthen implementation of current legislation Strengthen domestic waste bodies and municipal capacities	Accelerate the implementation of the existing legal framework and make secondary legislation more operational Focus on HoReCa and tourism Promote reuse and better design Prepare market for R packaging
Market	The EPR system should be designed as the financial backbone for plastics and packaging management, closely coordinated with the Albania Integrated Waste Management Plan 2020–2035 and with	Framed SUP phase-out as an economic issue that requires careful analysis Before adopting bans, Bosnia and Herzegovina should carry out an economic impact assessment of proposed measures on businesses and municipalities and	Prioritise regional recycling facilities for PET sorting and plastics recycling, linked to improved municipal collection services Municipalities, particularly along main transport corridors and in urban centres, need	Develop phased DRS plan, identifying scope, deposit levels and infrastructure needs Strengthen SUP ban surveillance in tourism hotspots and close loopholes for thicker bags	Focus on improving EPR performance and separate collection infrastructure, with particular emphasis on strengthening cooperation between PROs and municipalities	Prepare the market for reusable and recyclable packaging, must introduce an integrated package that combines a high-performing EPR system with a domestic DRS for beverage packaging and targeted public investment in

Area	Albania	Bosnia and Herzegovina	Kosovo*	Montenegro	North Macedonia	Serbia
	programmes supported by KfW, AFD and GIZ Coordinate EPR design with waste plans and donor programmes	design targeted support measures, especially for SMEs and the tourism and hospitality sectors, to ensure a just and feasible transition	support for equipment, logistics and technical assistance Where feasible, informal collectors should be integrated into formal value chains			collection and sorting infrastructure EPR, particularly if fees are modulated for recyclability and reuse, will provide continuous financing and market incentives for better design
Financing	Fiscal and financial incentives, green public procurement and targeted awareness campaigns will be needed to support businesses and consumers in shifting towards recyclable packaging and reuse models and to stabilise circular markets for recycled content	Bosnia and Herzegovina should prepare a realistic roadmap towards a DRS for PET bottles and cans Initial steps include an economic and technical feasibility assessment, consultation with industry and utilities across entities, and consideration of governance options that can function in a multi-level institutional environment		In parallel, the Eco-Fund and donor-financed programmes should prioritise co-financing for municipal separate collection and for small-scale reuse and refill pilots in tourism, retail and the beverage sector	Strengthening regional waste management bodies and municipal capacities, as envisaged in the North Macedonia Waste Management Plan 2021–2031, should be treated as a core priority	Develop financing plan for missing infrastructure Align EPR and public budgets

5.4. Promoting circular plastic packaging and design and recycled content

The transition from linear to circular plastic packaging is at the core of the EU plastics agenda and is rapidly becoming a precondition for continued access to EU value chains. For the WB6 and the RCC as a facilitator of regional integration, this agenda goes beyond environmental protection. It is equally a matter of industrial policy, trade competitiveness and regulatory convergence. The region exports packaged goods to the EU, imports a large share of packaging formats and technologies, and depends on external demand for secondary raw materials. Unless packaging placed on WB6 markets is designed for recyclability and reuse and includes meaningful recycled content, improvements in collection and waste management will not deliver circular outcomes. This chapter operationalises Action 22 of the Revised Action Plan for the Implementation of the GAWB 2025-2030, which commits the WB6 to phasing out the most polluting single-use plastics and integrating circular solutions for plastic packaging by 2030.

EU policy evolution provides the benchmark and direction of travel. The 2018 European Strategy for Plastics in a Circular Economy established the expectation that by 2030 all plastic packaging placed on the EU market should be reusable or recyclable in a cost-effective way and reinforced the need for higher recycling rates and better separate collection. Subsequent reforms and the SUP Directive introduced specific requirements for priority product groups, including collection targets and recycled-content obligations for beverage bottles. Most recently, the Packaging and Packaging Waste Regulation (PPWR) has been adopted, strengthening and legally binding the EU's ambitions by requiring that packaging be recyclable and setting detailed recycled-content targets for plastic packaging over the 2030-2040 period. Taken together, these measures signal that compliance is shifting from end-of-pipe waste management towards upstream requirements on packaging design, recyclability at scale and verified recycled content.

A substantial share of a product's environmental impacts is locked in during the design phase, and packaging choices determine whether items can be sorted and recycled in existing systems, whether additives or colourants reduce recycled content quality, and whether labels, adhesives and closures disrupt processing. In the WB6, the packaging mix often includes formats that are difficult to recycle (e.g., multi-layer films, complex laminates and coloured plastics), while domestic recycling capacity remains limited and typically focused on cleaner mono-material fractions such as clear PET, high-density polyethylene (HDPE) and selected polyolefins. This mismatch between what is placed on the market and what can be realistically collected and treated creates structural leakage: even when separate collection exists, a significant share is downcycled, exported as mixed bales, or ends up unmanaged. Closing the design-infrastructure gap is therefore essential for meeting Action 22 milestones, including the progressive phase-out of the most littered SUP items and a shift towards packaging that is demonstrably recyclable, reusable or compostable by 2030.

EPR is the main transmission mechanism between policy objectives and packaging design decisions. Where EPR systems are transparent, strictly enforced and linked to eco-modulated fees, charging more for hard-to-recycle formats and less for recyclable, high-recycled-content packaging creates a direct economic incentive for circular design. Comparative experience

from EU Member States shows that well-designed EPR, combined with strong collection performance, tends to correlate with higher recycling rates and more stable secondary markets. Germany's packaging reforms are frequently cited: strengthened governance, producer registration requirements and improved enforcement reduced free-riding and supported a more consistent approach to recyclability and fee differentiation. For the WB6, the key lesson is that EPR must function as more than a fee-collection mechanism; it should systematically reward design-for-recycling, incentivise recycled content and fund the enabling infrastructure and quality controls required for circular markets.

Voluntary European design frameworks provide practical tools that the WB6 can adapt rather than developing technical specifications from scratch. Initiatives such as Circular Economy for Flexible Packaging (CEFLEX) offer detailed design for a CE guidelines for flexible packaging, including recommendations on material choices, barrier layers, inks and adhesives. In parallel, EU standardisation work (through the European Committee for Standardisation and the European Committee for Electrotechnical Standardisation (CEN/CENELEC)) is progressing on harmonised approaches for recycled plastics, including characterisation and quality requirements for recyclates and methodologies to assess recyclability. For the WB6, these technical references can be used to anchor regulatory guidance, support producer compliance and help align the region's packaging formats with EU-compatible systems.

A pragmatic WB6 approach should prioritise convergence on three clusters of standards and requirements, rather than attempting to align with the entire European standards landscape at once. First, design-for-recycling and recyclability standards that define what is recyclable at scale in EU-compatible collection, sorting and recycling systems. Second, quality and traceability standards for recycled plastics, which are necessary for stable markets and credible recycled-content claims. Third, chemical safety and food-contact standards, including obligations related to substances of concern and legacy additives in both virgin and recycled polymers. This prioritisation ensures that packaging is not only technically recyclable, but also chemically safe – particularly important for food-contact applications and for avoiding unintended risks linked to hazardous substances in recyclates.

A sequenced implementation pathway is needed given that WB6 are at different stages of EPR and SUP transposition, recycling infrastructure remains insufficient and institutional capacity is constrained. At the same time, deeper integration into EU value chains and the Common Regional Market makes alignment necessary and potentially advantageous.

1. Develop and adopt regional design-for-recycling guidance for plastic packaging
2. Introduce phased recyclability and recycled-content requirements for priority categories
3. Integrate circular objectives into EPR/DRS fee modulation and spending priorities
4. Strengthen chemical safety and compliance for packaging and recyclates
5. Use public procurement and regional investment planning to create demand for circular packaging

A regional approach, anchored in common definitions, shared design guidance, fee modulation through EPR/DRS and reinforced chemical safety oversight, offers a practical route to deliver

Action 22 outcomes while protecting competitiveness and reducing regulatory fragmentation across WB6 markets.

More detailed version of this chapter is given in Annex 3.

Table 5. Recommendations against revised GAWB Action Plan and EU objectives

Recommendation	Relevance to revised GAWB Action Plan (2025–2030)	Relevance to EU-objectives	Stakeholders and responsible bodies	Timeframe	Key outputs and deliverables
Develop and adopt regional design for recycling guidance for plastic packaging	Direct operationalisation of Action 22 milestone on making ≥50% of plastic packaging recyclable/reusable/compostable by 2029 and on enabling phase-out of problematic formats	Supports EU plastics / circular packaging direction and provides an implementation bridge for future EU-aligned requirements on packaging design and recyclability	• RCC Secretariat • Competent authorities at WB6 level • PROs and DRS operators	By mid-2026 Launch regional expert group and ToR by end-2026 Draft WB6 circular packaging design guidance/manual By end-2027 Formal endorsement by WB6 By 2029 First review and update	• WB6 Circular Packaging Design Manual • Domestic references to the manual in packaging/EPR rulebooks and tender specifications • Technical criteria used by PROs and regulators to classify recyclable vs. problematic formats
Introduce phased recycled-content and recyclability requirements for priority packaging categories	Feeds directly into Action 22 milestones on (i) circular solutions for packaging and (ii) 30% recycled plastic content in plastic packaging by 2030, while staying coherent with Action 22 progress checks and the recyclable / reusable / compostable threshold by 2029	Aligns with EU direction on recycled content targets and circular packaging requirements	• Competent authorities at WB6 level • Food safety agencies and standardisation bodies • PROs and DRS operators • RCC Secretariat	By end-2026 Agree regional list of priority packaging categories and indicative thresholds By end-2028 Adopt WB6 level legal provisions introducing these requirements for agreed categories By 2029 Achieve ≥50% of plastic packaging placed on the market recyclable, reusable or compostable By 2030 Reach an average of 30% recycled plastic content in plastic packaging, with PET beverage bottles fully aligned with EU targets	• Regionally coordinated list of priority packaging categories and target thresholds • Amended EPR legislation with recyclability and recycled-content provisions • Public reporting on recyclability shares and recycled-content levels via GAWB Observatory / GARI

Recommendation	Relevance to revised GAWB Action Plan (2025–2030)	Relevance to EU-objectives	Stakeholders and responsible bodies	Timeframe	Key outputs and deliverables
Integration of circular packaging objectives into EPR fee modulation and spending priorities	Anchors Action 22 delivery through the financing mechanism of Action 19 and ensures EPR systems are functional by 2028 as an enabler for Action 22	Aligns with EU minimum requirements for EPR governance (Waste Framework Directive Article 8a) and packaging EPR expectations	• Competent authorities at WB6 level • PRO licensing / oversight authorities and inspectorates • PROs and DRS operators • RCC Secretariat	By end-2026 Adopt regional guidance on EPR harmonisation, eco-modulated fees and minimum spending rules By end-2027 Revise packaging / EPR laws, by-laws and PRO licences to integrate fee modulation and earmarked spending for prevention, reuse and recycling By end-2028 Ensure functional packaging EPR systems in all WB6 that explicitly support Action 22 targets on SUP phase-out and circular packaging By end-2028 Establish annual EPR monitoring and public reporting against agreed regional indicators	• Regional minimum requirements note for fee modulation and EPR governance • Revised EPR by-laws and PRO contracts
Link circular packaging design with public procurement and regional investment planning	Converts Action 22 commitments into enforceable demand side measures, especially around removing top littered SUP items and shifting packaging formats, supporting the Action 22 roadmap by triggering market change by 2028–2029	Supports implementation-oriented alignment with EU direction on reducing SUP and shifting to circular alternatives	• RCC Secretariat • WB6 public procurement offices and ministries of finance • WB6 environment / waste ministries • Large public buyers • International financial	By mid-2027 Transpose Regional Green Public Procurement (GPP) criteria into WB6 level GPP guidance By 2027 Include SUP-free and circular-packaging clauses in central government catering, events and cleaning tenders By end-2028 Eliminate the top five most littered SUP items from central government framework contracts	• Updated WB6 level GPP guidelines and model tender clauses reflecting circular packaging criteria • Public contracts in priority sectors that exclude top five SUP items and require circular packaging solutions

Recommendation	Relevance to revised GAWB Action Plan (2025–2030)	Relevance to EU-objectives	Stakeholders and responsible bodies	Timeframe	Key outputs and deliverables
			institutions (IFIs) and EU delegations	and prioritise compliant circular packaging solutions By 2030 Apply SUP-free and circular-packaging GPP criteria across most local government contracts and major publicly funded investment projects	
Embed circular packaging considerations into regional cooperation	Provides the governance structure needed to implement Action 22 as a truly regional commitment and to coordinate enablers under Action 19 (EPR) and Action 20 (infrastructure)	Supports EU-alignment by reducing compliance complexity for intraregional operators and strengthening preparedness for EU market rules and future packaging requirements	• RCC Secretariat • WB6 Competent Authorities • WB6 Green & CE Stakeholder Platform members • Regional bodies working on trade and standards	By end-2026 Establish a WB6 Circular Plastic Packaging & SUP Platform under GAWB governance (with approved ToR and workplan) By end-2026 Agree a common regional monitoring template and annual reporting cycle for Action 22 indicators By end-2027 Produce the first regional progress report on circular packaging and SUP phase-out and recommend corrective measures where needed By 2030 Maintain annual regional reviews tracking delivery of Actions 19, 20 and 22 and update regional/domestic roadmaps accordingly	• Formal ToR and workplan for a WB6 Circular Plastic Packaging & SUP Platform • Annual regional progress reports on Action 22 implementation feeding GARI

5.5. Implications and recommendations for the WB6

A regional shift towards reuse and refill should complement the phase-out of SUP and the move to circular plastic packaging in the WB6. While improving design and recyclability helps manage waste better, reuse and refill systems prevent waste from being created in the first place. They can reduce consumption of the most problematic items, especially in cities and tourist areas where disposable products are used heavily. Because beverage, food service and logistics markets are already connected across the region, coordination matters. If each WB6 applies different rules for reusable packaging or refill models, businesses face higher costs and unnecessary complexity.

Early efforts should focus on practical use-cases where demand is concentrated and logistics can work. Priority areas include takeaway food and drinks in urban centres and tourism hotspots, catering and public events, and selected fast-moving consumer goods where refill is already proven in other markets. This could include shared reusable cup and food container schemes for restaurants, festivals and city centres, deposit-based takeaway solutions and targeted refill pilots for cleaning and personal care products in major retail chains. There is also strong potential in business-to-business (B2B) applications such as reusable transport packaging in retail and agri-food supply chains, which can cut single-use films, pallets and crates quickly and often pays back fast. Given the WB6's large SME base, informality and limited access to capital, pilots should be simple, low-entry and launched in concentrated areas like coastal municipalities, capitals and key tourist destinations.

To scale these systems, the WB6 need shared definitions and minimum standards for reusability, durability, traceability and hygiene, aligned with emerging EU requirements and GAWB Action 22. Harmonised labelling would make return systems clearer, and economic tools within EPR and deposit schemes should reward reuse and avoid locking in one-way models. Delivery will require coordinated roles for ministries, health authorities, municipalities, businesses, PROs, civil society organisations (CSOs) and consumer groups, with the RCC providing regional coordination and supporting flagship intraregional pilots.

5.6. Prioritisation of RCC-facilitated actions

The recommendations in this report are intentionally broad, spanning regional frameworks, thematic instruments and WB6 specific measures. For implementation, the RCC will need a clear sense of what to do first and how to sequence its support so that WB6 can deliver on the GAWB, in particular Action 22 on phasing out SUPs and integrating circular solutions for plastic packaging. This section therefore distils the wider recommendation set into a focused package of RCC-led priorities for the period up to 2030, with particular emphasis on actions that should be initiated in the near term (2025–2027).

In the first wave (2026), RCC's main task is to put in place a regional operating system for Action 22. This means convening a regional platform on SUP and circular plastic packaging under the GAWB governance structure, steering agreement on a joint WB6 roadmap for SUP phase-out and circular packaging, coordinating the development of a harmonised MRV architecture, and facilitating the adoption of a Joint WB6 Statement on phasing out the top five most littered SUP items. Building on the 2023 Regional Joint Statement on Plastic Pollution,

RCC should facilitate a new, more operational Joint Statement that commits WB6 to coordinated phase-out of lightweight carrier bags, beverage containers, cups for beverages, food containers and cutlery, with clear indicative timelines and links to GAWB Action 22. This should be one of the first political deliverables under the revised Action Plan and a visible signal to citizens, municipalities and businesses. The platform should bring together line ministries, environmental agencies, PRO and DRS operators and other key stakeholders. Its early outputs should include common definitions, an agreed list of priority SUP groups for coordinated phase-out, and a practical handbook for implementing the Action 22 indicators through the GAWB Observatory and GARI. In parallel, RCC should launch two technically focused workstreams that will underpin later investment and regulatory decisions. The first is the preparation of a WB6 circular packaging design manual, drawing on EU design-for-recycling guidance and adapted to the realities of WB6 collection and recycling systems. The second is the coordination of a regional minimum requirements package for packaging EPR and DRS, covering producer registration, fee modulation principles, minimum performance criteria and basic interoperability of future deposit-return schemes. Both workstreams can be delivered through expert groups mandated by the regional platform and should produce model provisions and templates that WB6 can transpose into their own legislation.

The second wave (2027–2028) should focus on translating this framework into visible change on the market. RCC's priority here is to support implementation in frontrunner WB6 while ensuring that lessons are rapidly shared across the region. This includes facilitating pilot projects on reuse and refill systems in HoReCa, retail and events, coordinating regional or sub-regional feasibility assessments for DRS, and supporting the roll-out of Regional Green Public Procurement (GPP) criteria that explicitly restrict the top five SUP items and favour compliant circular packaging. RCC should also promote the use of programming instruments and Growth Plan resources to align infrastructure and investment pipelines with the agreed regional packaging design criteria and EPR/DRS frameworks. **The third wave (2029–2030)** centres on consolidation and scaling. By this stage, the emphasis of RCC support should shift towards tracking performance against Action 22 milestones, organising peer reviews, and troubleshooting lagging areas. The regional platform should review progress on plastic pollution strategies, SUP bans, EPR functionality and circularity indicators, using the MRV system to identify where additional technical assistance, enforcement cooperation or investment preparation is required. RCC can also help prepare the region for further EU regulatory developments on packaging and plastics, ensuring that WB6 maintain regulatory convergence and remain competitive in EU value chains.

Within this overall sequencing, following actions merit top priority in the immediate term:

1. establishing the regional platform and endorsing a joint Action 22 roadmap;
2. launching the expert group on circular packaging design guidance;
3. agreeing the regional indicator set and reporting workflow; and
4. initiating at least one regional GPP and one reuse/refill pilot as tangible proof-of-concept.

The table below summarises recommendations from this chapter and translates them into easy-to-follow steps, broken down by key actions and milestones.

Table 6. Summary of recommendations, key actions and timelines

Level	Recommendation	Key actions for RCC and partners	Indicative timeline
Regional - political commitment	Adopt a Joint WB6 Statement on phasing out the top five most littered SUP items	Building on the 2023 Regional Joint Statement on Plastic Pollution, RCC should facilitate the preparation, consultation and endorsement of a new, more operational Joint WB6 Statement committing the WB6 to the coordinated phase-out of lightweight carrier bags, beverage containers, cups for beverages, food containers and cutlery. The Statement should define indicative timelines, link commitments clearly to GAWB Action 22, and serve as an early political signal to citizens, municipalities and businesses.	By mid-2026: Joint WB6 Statement prepared and endorsed; 2026–2030: used as a political reference for subsequent legal, policy and investment actions
Regional - governance	Establish coordinated regional framework for SUP phase-out and circular plastic packaging	Set up regional platform on SUP and circular packaging under GAWB, agree common definitions and list of priority SUP groups, adopt joint WB6 roadmap aligned with Action 22.	By mid-2026: platform operational and roadmap endorsed 2026–2030: annual review and adjustment.
Regional - MRV	Develop and operationalise regional KPI and MRV architecture	Finalise Action-22-aligned KPI set, define methodologies and data flows, integrate indicators into GAWB Observatory / GARI, support domestic focal points in establishing reporting routines.	By end-2026: KPI set and MRV manual adopted from 2027: annual WB6 monitoring report.
Thematic - circular packaging design	Develop and adopt WB6 circular packaging design manual	Convene expert group, adapt EU design-for-recycling guidance, consult with industry and PROs, secure political endorsement, support incorporation into domestic EPR and packaging rules.	By end-2026: draft manual By end-2027: endorsement and first domestic references By 2029: first review
Thematic - recycled content and recyclability requirements	Introduce phased recyclability and recycled-content milestones for priority packaging categories	Coordinate agreement on priority categories (e.g. PET bottles), propose indicative regional thresholds, support WB6 in drafting legal provisions, ensure consistency with Action 22 milestones.	2026–2028: regional agreement and domestic legal changes 2029–2030: first milestone checks
Thematic - EPR and DRS alignment	Harmonise core EPR and DRS requirements across WB6	Prepare regional minimum criteria for functional packaging EPR and DRS, develop model clauses for legislation and licences, organise peer-learning on enforcement and performance monitoring.	By 2027: minimum criteria adopted By 2028: all WB6 with operational packaging EPR 2028–2030: roll-out of DRS in pilot WB6
Thematic - GPP and investment	Link circular packaging and SUP phase-out with regional GPP and investment planning	Promote systematic uptake of Regional GPP criteria, develop model tender clauses excluding priority SUPs and favouring compliant packaging, integrate circular packaging into regional investment and Growth Plan pipelines.	2025–2027: model clauses and first pilots By 2028: widespread use in central government tenders By 2030: standard practice across WB6
Thematic - reuse and refill	Coordinate regional approach to reuse and refill systems	Identify priority use-cases (HoReCa, retail, events, public catering), support at least 2–3 cross-WB6 pilots, document and disseminate lessons, explore common standards and labelling where relevant.	2026–2028: pilots launched and evaluated 2029–2030: scaling up of successful models

Level	Recommendation	Key actions for RCC and partners	Indicative timeline
WB6 specific - strategies and SUP bans	Support adoption and implementation of plastic pollution strategies and SUP bans for top 5 items	Provide technical assistance for drafting/updating strategies, share model legal provisions for SUP bans and restrictions, facilitate peer review of draft measures.	By 2028: all WB6 with strategies and bans/restrictions for top 5 SUP groups as per Action 22
WB6 specific - EPR/DRS and local implementation	Help WB6 operationalise EPR and prepare DRS, and strengthen local infrastructure	Channel regional expertise and donor support into EPR implementation, DRS feasibility work, municipal collection upgrades and enforcement cooperation, organise targeted jurisdiction support missions.	2025–2028: EPR systems reaching basic functionality 2028–2030: DRS roll-out and consolidation of separate collection systems

6. Conclusion

This report provides the RCC Secretariat and WB6 institutions with structured evidence base and an operational basis for implementing the 2023 Regional Joint Statement on Plastic Pollution and delivering the revised GAWB Action Plan (2025–2030). It (i) maps the legal, institutional and implementation landscape on SUP and plastic packaging, (ii) proposes harmonised and WB6 specific measures to phase out priority SUP and promote circular plastic packaging, and (iii) identifies business case options for private investment. The value of this work will be realised only if these elements are translated into a clear sequence of regional and actions at WB6 level for the period up to 2030.

Immediate priorities (2026)

In the immediate term, WB6 and RCC should focus on consolidating political commitment and establishing the regional structures that will carry the transition forward:

- Adopt a Joint WB6 Statement on phasing out the top five most littered SUP items. Building on the 2023 Regional Joint Statement on Plastic Pollution, RCC should facilitate a new, more operational Joint Statement that commits WB6 to coordinated phase-out of lightweight carrier bags, beverage containers, cups for beverages, food containers and cutlery, with clear indicative timelines and links to GAWB Action 22. This should be one of the first political deliverables under the revised Action Plan and a visible signal to citizens, municipalities and businesses.
- RCC should formalise a dedicated regional platform with approved Terms of Reference and a multi-year workplan, bringing together line ministries, environmental agencies, PROs, DRS operators, municipalities, business associations and civil society. The Platform should coordinate implementation of this report's regional recommendations, steer alignment of WB6 level measures and provide a forum for peer learning and troubleshooting.
- RCC should issue a KPI metadata catalogue, reporting templates and a calendar for the first submission cycle, designate WB6 level MRV focal points and launch a light-touch MRV helpdesk.
- RCC should convene regional expert groups to prepare (i) a WB6 circular packaging design manual aligned with EU design-for-recycling guidance, and (ii) a minimum requirements package for packaging EPR and DRS. These outputs will provide the technical backbone for subsequent legal reforms and investment decisions.
- RCC and WB6 authorities should identify and prepare a first wave of investment and pilot concepts around core business models such as DRS operators, food-grade rPET production and reverse-logistics providers for reusable systems.

Mid-term priorities (2027–2028)

Once the political and institutional foundations are in place, the focus in 2027–2028 should shift decisively towards measures that citizens and businesses can see on the ground:

- WB6 should adopt or tighten legal restrictions and economic instruments on the top five SUP items, with particular emphasis on public procurement, HoReCa, retail and events. The Regional GPP criteria should be transposed into WB6 level GPP guidance and central government tenders should embed SUP-free and circular-packaging clauses, eliminating the top five SUPs from framework contracts in priority sectors.
- Building on the regional EPR/DRS minimum requirements, WB6 should revise packaging and EPR legislation, introduce eco-modulated fees and earmarked spending for prevention, reuse and high-quality recycling, and, where appropriate, establish DRS for beverage containers.
- Guided by the regional reuse/refill blueprint, RCC and WB6 should support pilots and emerging business models in HoReCa, retail and events, anchored in professional reverse-logistics and washing services. The objective should be to move from scattered pilots to robust service offers, particularly in major cities and tourism hotspots, supported by EPR funding, GPP demand and, where relevant, DRS interfaces.
- Using the recommendations and business case analysis, WB6 authorities and RCC should align programming under EU and IFI instruments with the agreed circular packaging priorities. This includes investments in sorting upgrades, food-grade rPET plants, DRS counting centres and logistics, and reuse infrastructure.
- By 2028, at least one full cycle of KPI reporting and regional progress review should have been completed. RCC should publish regional dashboards and narrative reports, identify bottlenecks and convene targeted peer-learning and technical assistance to address underperformance, in particular where WB6 lag behind on the Joint Statement commitments or Action 22 milestones.

Long-term priorities (2029–2030)

In the final phase of the GAWB Action Plan, the emphasis should be on meeting the agreed quantitative targets and embedding circular plastic packaging as a structural feature of the WB6:

- Deliver Action 22 milestones and KPI targets. By 2028, availability of the top five SUP items on the market should be reduced by around 80% against the 2023 baseline, with bans and economic instruments fully operational. By 2029, at least half of plastic packaging placed on the market should be recyclable, reusable or compostable in practice, and by 2030 average recycled plastic content in plastic packaging should reach 30%, fully aligned with EU requirements for PET beverage bottles and other key categories.
- Normalise circular packaging practices across markets and administrations. Reuse and refill systems, DRS and high-performing EPR should no longer be treated as exceptional pilots but as mainstream service models. GPP criteria should be routinely

applied at central and local levels, ensuring that publicly funded projects and contracts systematically exclude top five SUP items and favour circular packaging solutions.

- Institutionalise regional governance and continuous improvement. The WB6 Circular Plastic Packaging & SUP Platform and MRV architecture should be maintained as permanent features of the GAWB governance landscape, providing annual regional reviews, early-warning signals and updated roadmaps beyond 2030. This will allow WB6 to extend the approach to other priority product groups and to respond to future EU legislative developments with coordinated, evidence-based action.

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8. Annexes

Annex 1. The regional landscape related to plastic packaging

Albania

Legislative and regulatory framework

Waste system in Albania is based on the Law on Integrated Waste Management [17], partly aligned with the EU acquis, which assigns the Ministry of Environment responsibility for policy and monitoring and municipalities for local waste services. The law establishes principles for separate collection, regional planning, and EPR. The Integrated Waste Management Plan 2020–2035 [18], [19] builds on this framework, setting targets for prevention, recycling, and infrastructure, and calls for full EPR implementation through a separate law, along with legal revision, regionalisation, sustainable financing, and stronger institutional capacities.

Albania advanced its alignment with the EU SUP Directive (2019/904), banning the import, production, and use of lightweight plastic bags (<70 microns) and oxo-degradable plastics. Effective 1 June 2022, it marked the first concrete step towards the phase-out of SUP in line with EU standards [20].

In September 2025, the accession negotiations on Green and Sustainable Connectivity [21] were opened, stressing the need to align legislation with the EU SUP acquis. The European Commission's 2024 Report [22] noted progress through the CE Roadmap, Marine Environment Law, and Water Resources Law, but highlighted weak enforcement of the 2022 plastic bag ban and called for broader SUP restrictions, confirming both advancement and remaining gaps in full EU alignment.

The Draft Law requires producers of packaging, WEEE, batteries, and end-of-life vehicles to finance and manage their waste through PROs and a product fee system. Once adopted, it will mark a key step towards full alignment with the EU Waste Framework and SUP Directives [23].

Law on Chemicals Management was adopted in 2016 and represented a significant legislative development. It aimed to transpose Regulation (EC) No. 1907/2006 concerning the REACH and create the legal basis for further transposition of the acquis, including on asbestos and mercury [24]. In April 2021, Decision of the Council of Ministers No. 222 of 7 April 2021 (Vendim i Këshillit të Ministrave nr. 222, datë 7.4.2021) on approving the Candidate List of Substances of Very High Concern (SVHCs) was published. This Candidate List contains 211 SVHCs (similar to the EU's REACH Candidate List before July 2021) and is an integral part of the Law No. 27/2016 (Ligj nr. 27/2016 datë 17.3.2016) on the management of chemicals (Chemical Management Law), a comprehensive piece of legislation on the management of chemicals that has been in effect since 2018.

According to the latest Decision, the new law will become effective on 13 April 2022 – one year after its publication in the Official Gazette. The Chemical Management Law is based on two pieces of legislation from the European Union:

- Regulation (EC) 1907/2006 on REACH
- Regulation (EC) 1272/2008 on CLP

It contains 13 chapters and includes provisions for, among other things, the creation of a Chemicals Office (Zyra e Kimikateve), Candidate List of SVHCs, Authorisation List of SVHCs, restrictions on the manufacture, placing on the market and use of certain dangerous substances, mixtures and articles, a helpdesk to assist stakeholders, safety data sheets (SDSs), classification, labelling and packaging of substances and mixtures, including provisions for fulfilling convention-related obligations and other international agreements for chemical management (Stockholm Convention, Rotterdam Convention and Convention on Long-Range Transboundary Air Pollution (CLRTAP) protocols).

According to last Accession Document [25] related to chapter 27 and chemical management and waste management:

- The EU notes partial alignment with the acquis on waste management and the need for undertaking major efforts to achieve progress in this sector, including by assessing the environmental impacts of both waste generation and waste treatment processing. The EU also notes partial alignment with the Waste Framework Directive, Waste Electrical and Electronic Equipment Directive, Packaging and Packaging Waste Regulation and most EU acquis on waste. The EU stresses the need to align with the SUP acquis. The EU further notes the new waste acquis in the areas of Waste Shipment and Batteries which introduces stricter sustainability and waste management requirements. The EU encourages further inclusion of CE aspects, especially consideration of non-waste related aspects of products' lifecycles.
- The EU underlines the importance of limiting the impact of chemicals on the environment. The EU invites Albania to align on the Biocides Regulation and allocate more resources for inspection and enforcement. The EU stresses the importance of alignment and implementation of REACH, including through strengthening inspection resources, as well as with the Prior Informed Consent (PIC) Regulation, the Asbestos Directive and the Mercury Regulation. The EU also calls for finalising alignment with CLP. The EU urges alignment with the Animal Experiments Directive paying particular attention to its definitions. The EU also stresses the need to intensify efforts to align with the Stockholm Convention on persistent organic pollutants (POPs), especially in inspection and enforcement.

Strategies and implementation realities

According to INSTAT, municipal waste collection covered about 89% of Albania's population. However, progress remains limited: recycling stagnated around 18.8% between 2021 and 2023, even declining slightly in 2023, while landfilling continued to dominate at 76–79% and energy recovery rose modestly to 4.6%. Despite improved coverage, separate collection is still minimal, showing that it remains far from its recycling targets and must accelerate EPR

implementation and SUP reduction to meet the goals of the Waste Plan 2035 and the RCC SUP initiative.

The Integrated Waste Management Plan 2020–2035 [26] sets clear quantitative targets and a regionalised infrastructure model requiring at least one treatment and recycling facility per waste zone, supported by transfer stations, MBT plants, sanitary landfills, and construction and demolition (C&D) waste facilities. By 2030, it aims to recover at least 30% of packaging waste, including plastics, as part of its broader recycling agenda that also sets progressive targets for biodegradable, construction, electronic, and other waste streams by 2035.

To strengthen implementation, the government established the Waste Economy Agency (AKEM). The agency is mandated to coordinate and monitor municipalities in integrated waste management and to collect and analyse waste generation and collection data through its statistics department.

On the other side, significant investments are under implementation. KfW supports the Vlora regional waste management system and closure of illegal dumpsites, EU/French AFD programmes are developing sanitary landfills and recycling facilities in Gjirokastër, South Vlora, and Kukës, GIZ assists the Ministry of Tourism and Environment in improving municipal planning and awareness across 50+ municipalities and Helvetas (Bashki të Forta) strengthens local waste governance and service delivery. Despite these advances, many municipalities, such as Kruje, Tirana, Durres and surrounding areas, still lack full-service coverage and rely on uncontrolled dumping, posing serious environmental and public health risks.

Persistent plastic leakage, especially from uncollected urban and peri-urban areas, underscores the urgency of SUP measures. The Ishmi River, identified as one of the most polluted rivers in Europe, carries an estimated up to 500 tonnes of plastic annually [27] into the Adriatic Sea. Nearly one-third of Albania's population lives within its basin, where waste collection is incomplete and source separation almost non-existent. Although Tirana reported 100% waste collection coverage in 2024, recent on-site assessments (mid-2025) by activists suggest otherwise. Meanwhile, the rural municipalities with the lowest coverage remain Fushe-Arrez (22%), Has (35.2%), and Memaliaj (50%). Data indicate a decline in managed urban waste volumes from 2020 to 2022, followed by a slight increase in 2023–2024 [28].

According to the European Commission's 2024 Report, Albania's waste system remains partly aligned with the EU acquis, with limited progress towards CE targets. The Environmental Status Report 2024 (AKM) highlights ongoing reforms, including the Integrated Environmental Information System (SIMM) to improve waste data and transparency by 2025, and the need to strengthen EPR implementation, organic waste treatment, and municipal coordination [28]. Despite these advances, enforcement and data gaps persist, and EPR rollout and SUP reduction must be accelerated to meet its goals and the RCC SUP regional objectives.

Alignment with EU and regional commitments

Albania is moderately prepared under Chapter 27 – Environment and Climate Change and has made some progress towards EU alignment through the 2024 CE Roadmap and new Marine

and Water Laws [29]. However, it still needs to transpose and operationalise the revised Waste Framework Directive, establish and implement the EPR law and system, and establish robust data and enforcement mechanisms to reach EU compliance.

Through the GAWB, it committed to a CE transition, pollution reduction, and plastic waste prevention, including marine litter control [30]. These commitments were reaffirmed in the Berlin Process Summit 2023 Joint Statement on Plastic Pollution, which called for regional coordination on SUP and stronger EPR schemes [1]. The RCC Strategy and Work Programme 2026–2028 (p. 20) explicitly prioritises the Regional Action Plan on Plastic Pollution Prevention, including Marine Litter, as part of the GAWB implementation, confirming the RCC's continued commitment to regional coordination on plastic reduction and CE transition [31].

Progress towards the EU SUP Directive (2019/904) began with the 2022 plastic bag ban [20], marking first tangible step. However, broader measures, such as market restrictions, EPR and DRS for beverage containers, and public awareness obligations remain pending. The European Commission's 2024 Report and the OECD CE Roadmap for Albania (2024) both stress the need for accelerated implementation and pilot initiatives modelled on EU best practices [32].

Priority alignment actions include:

- Adopt and enforce the EPR Law, accrediting PROs for packaging, WEEE, batteries, and end-of-life vehicles.
- Expand separate collection and composting pilots through municipal investment and PAYT scheme.
- Implement SUP measures beyond plastic bags, including cleanup, awareness campaigns, and market restrictions.
- Strengthen enforcement capacity, including digital reporting, boundary inspections, and prosecution for illegal waste trafficking.

Bosnia and Herzegovina

Legislative and regulatory framework

Regulatory approach to plastic packaging operates across multiple administrative levels. Environmental protection is largely decentralised, the Federation of Bosnia and Herzegovina Republika Srpska, and Brcko District each have their own waste management laws and by-laws. While no comprehensive waste law exists at the Bosnia and Herzegovina level, both entities have established EPR schemes for packaging waste under their respective laws. Producers, importers and retailers must either join a certified PRO or pay higher fees into entity environmental funds [33]. This entity-based system means a PRO licensed in one entity cannot operate in the other. Brcko District currently lacks an EPR scheme.

In Federation of Bosnia and Herzegovina, the Rulebook on Packaging and Packaging Waste Management issued in 2011 defined stakeholders' duties and set modest recycling targets. In April 2023, Federation of Bosnia and Herzegovina adopted a new packaging waste rulebook to better align with EU norms. This updated regulation raises the overall packaging waste recycling target from 37% to 45% over 2023–2027 and introduces specific obligations for

separate collection, e.g. requiring cantonal authorities and utilities to set up systems to collect packaging waste from households. The rulebook also eliminates loopholes (e.g. reclassifying multilayer packaging under its dominant material) and emphasizes CE principles such as reuse and recycling [34]. In practice, producers in Federation of Bosnia and Herzegovina fulfil their obligations by contracting authorised PROs like Ekopak or Eko život, which are non-profit system operators responsible for meeting material-specific recycling quotas. Any producer who opts out must pay a prescribed fee to the Federation of Bosnia and Herzegovina Environmental Protection Fund, per the polluter-pays principle.

Republika Srpska regulates packaging waste under its Law on Waste Management and a 2018 Rulebook on Packaging and Packaging Waste Management. This rulebook encourages waste prevention at the source by setting design requirements so that packaging is minimal and easier to recycle. It also obliges producers to use reusable (returnable) packaging as much as feasible, reflecting an early focus on reuse and refill systems [35]. It has licensed its own packaging PRO (Euro Beta) to collect and recycle packaging on behalf of obligated companies. Like in Federation of Bosnia and Herzegovina, the PRO in Republika Srpska must operate on a non-profit basis and reinvest any surplus in recycling infrastructure.

Both entities' regulations historically set low recovery targets, e.g. Federation of Bosnia and Herzegovina targeted only 16% recycling of plastic packaging by 2021, and Republika Srpska about 20% by 2018 [33]. These targets were significantly below EU Packaging Directive benchmarks, and in fact by 2016 neither entity met its goals (Federation of Bosnia and Herzegovina achieved an estimated 15% recovery rate), prompting authorities to suspend or revise targets. Enforcement challenges remain a concern, as studies noted that over 50% of packaging placed on the market may go unreported by free riders who evade EPR requirements. Strengthening compliance and data reporting is thus an ongoing priority in Republika Srpska and Federation of Bosnia and Herzegovina [36].

Federation of Bosnia and Herzegovina introduced an eco-fee on lightweight plastic carrier bags in 2014 (starting from 0.05 BAM per bag) as a partial transposition of the EU plastic bag directive. Most supermarkets now charge shoppers for plastic bags, and a draft law to ban or restrict thin plastic bags (under 50 microns thickness) has been prepared by the Federation of Bosnia and Herzegovina ministry. Republika Srpska is reportedly working on a similar by-law for plastic bags. Beyond plastic bags, however, Bosnia and Herzegovina has not yet transposed the broader EU SUP Directive and there are no entity-level bans on items like disposable straws, cutlery or stirrers, nor requirements for tethered bottle caps or minimum recycled content in bottles as of 2025. There is also no DRS in place for beverage containers. Industry stakeholders acknowledge that a DRS for PET and cans could greatly increase collection rates, especially given the EU's 90% separate collection target for bottles by 2029 [33].

Bosnia and Herzegovina regulates chemicals through entity-level laws, primarily the Federation of Bosnia and Herzegovina's Law on Chemicals (2020) and similar legislation in Republika Srpska, aligning with EU standards like REACH/CLP for classification, labelling, safety data sheets (SDS), and managing hazardous substances, requiring registration/notification into Chemical Inventories, permits for poisons, and designating

chemical advisors for market access. Key requirements involve proper labelling (SDS, pictograms), inventory entry (notification/registration), and permits for specific categories like poisons or narcotics precursors, with strict rules for biocides needing efficacy data.

- Federation of Bosnia and Herzegovina
  - Law on Chemicals (2020)
  - Focus on permits for poisons, biocide laws are developing
- Republika Srpska
  - Adopted its own Law on Chemicals in 2009
  - Importers must register and have an advisor; chemicals are listed in an Official Register
- Brcko District
  - Has not yet adopted its specific laws

Competent ministries at the entity level (health, environment) manage registers and permits.

In essence, companies need to identify if their product is a general chemical, biocide, or precursor, fulfil entity-specific registration/permit steps, and ensure documentation (SDS, labels) aligns with Bosnia and Herzegovina adaptations of international standards like Globally Harmonized System (GHS)/REACH.

Last Report [37] from 2024 for Bosnia and Herzegovina states that it still needs to adopt a strategy for waste management, focusing on CE, the EU plastic strategy and the Directive on SUPs. Also, it still needs to align with the Landfill Directive as well as with the acquis on sewage sludge, batteries, packaging, polychlorinated biphenyls / polychlorinated terphenyls and end-of-life vehicles.

On chemicals, it needs to ensure full alignment with EU Regulations (on registration, evaluation, authorisation and restriction of chemicals – REACH, on classification, labelling and packaging of substances and mixtures – CLP, and on biocidal products), and appoint the responsible bodies. Bosnia and Herzegovina still needs to implement the Rotterdam Convention on trade of hazardous chemicals, to which it is a party. There has been no progress in acceding to the Minamata Convention on Mercury.

Strategies and implementation realities

As an EU candidate since 2022, Bosnia and Herzegovina has committed to align with European Green Deal goals, including the GAWB pledge of a 50% recycling rate by 2030, but implementation remains complex across its decentralised governance [38]. There is no single CE action plan. Instead, each jurisdiction has developed its own strategic framework. The Federation of Bosnia and Herzegovina, Republika Srpska and Brcko District adopted their Environmental Strategies 2022–2032 (covering waste management as a key pillar) to harmonise policies with EU standards [39]. Republika Srpska has an active Waste Management Strategy for the period 2017–2026 [40]. Brcko District earlier integrated a Waste Management Strategy into its Environmental Protection Strategy 2016–2026 [41]. These strategies build on measures for better waste collection, recycling infrastructure and EU acquis compliance, reflecting Bosnia and Herzegovina's obligations under international accords like the Paris

Agreement and the Sofia Declaration on the GAWB. Currently, a Roadmap on SUP phase-out at entity level is under preparation.

As mentioned earlier, packaging waste is regulated with EPR and PRO schemes, but in practice, these schemes struggled and free riders were common, with an estimated over 50% of packaging put on the market in Federation of Bosnia and Herzegovina going undeclared, depriving the system of funds [42]. Enforcement was poor and recycling rates remained low (only 15% of packaging waste was being recovered a few years ago). Recognising this gap, the Ministry of Environment and Tourism of Federation of Bosnia and Herzegovina introduced a new Rulebook on Packaging Waste Management in April 2023 that raises the entity's recycling targets from 37% to 45% by 2027. The rulebook also mandates that at least 5% of all packaging placed on the market be separately collected from municipal waste streams, and it obliges every canton and public utility in Federation of Bosnia and Herzegovina to establish separate collection systems for packaging waste. These tighter rules, alongside simplified reporting through the Environmental Protection Fund's information system, aim to strengthen EPR implementation. In both entities, PROs now invest in infrastructure (bins, recycling yards, vehicles) and education campaigns to boost collection [34]. Ekopak alone has recycled over 150,000 tonnes of packaging in 13 years and expanded separate collection to all 10 Federation of Bosnia and Herzegovina cantons. Even so, structural challenges persist: recycling capacity for certain materials is limited (Bosnia and Herzegovina has domestic recyclers for PET, paper, metal, etc., but no glass recycling plant, forcing costly export of glass waste) [42]. Both entity Environmental Protection Funds provide financial support for recycling projects, yet the small market split into two EPR systems entails higher administrative costs and duplication.

Aligning with the EU's SUP Directive (2019/904) is a developing effort. Thus far, authorities have taken only preliminary steps to curb SUP products. The Federation of Bosnia and Herzegovina introduced a modest plastic bag levy and retailers commonly charge 0.10 BAM (close to 0.05 EUR) per lightweight bag in line with the 2014 regulation. These measures, while intended to cut down disposable carrier bags, only partially transpose EU requirements and predate the broader SUP Directive. As of 2025, no entity has yet prohibited common SUP items (like straws, cutlery, stirrers, etc.) nor implemented special labelling or consumption-reduction targets as mandated by the SUP Directive. The current waste laws treat plastic mostly under general packaging waste rules, without specific provisions for SUP categories. A UNDP-supported analysis in 2021 underscored the regulatory changes and industry adjustments needed to transpose the SUP Directive into Bosnia and Herzegovina legislation [33].

International partners have launched pilot initiatives to reduce SUP on the ground. For example, in 2023 the EU funded MedWaves centre and GIZ rolled out a Low Plastic Zone programme in Mostar to encourage hotels, restaurants and cafes to phase out SUP items from their daily operations [43].

A DRS for drink containers is under active discussion. At a high-profile Waste Management Forum in November 2023 (organised by UNDP and MoFTER), over 150 stakeholders, including government officials, private sector and NGOs, recommended introducing a DRS to incentivise the return and recycling of bottles and cans. Such a DRS would make producers

and consumers financially responsible for ensuring packaging is returned, aligning with the polluter-pays principle [44]. International organisations like the European Commission, OECD, UNDP and GIZ are supporting Bosnia and Herzegovina through technical assistance, policy advice and funding, from drafting the environmental strategies (i.e. the ESAP 2030+) to financing local CE projects. The implementation reality is that its journey to a circular plastic economy will be long and requires sustained reforms, meaning stronger enforcement of producer responsibilities, better data on waste flows, modernised recycling infrastructure and cultural change towards waste reduction.

Alignment with EU and regional commitments

Bosnia and Herzegovina is aligning its waste management and CE policies with the EU acquis. A priority is the EU Packaging and Packaging Waste Directive, which introduces EPR and obliges producers to meet recycling targets [45]. The EU directive sets ambitious recycling targets, i.e. 50% of plastic packaging waste must be recycled by 2025 (rising to 55% by 2030) [46].

It must also implement the EU SUP Directive (2019/904), which bans certain disposable plastic items (such as single-use cutlery, plates, straws and polystyrene food containers). This directive also mandates measures like a 77% separate collection rate for plastic bottles by 2025 (90% by 2029) and minimum recycled content in beverage bottles. These requirements stem from the EU's CE Action Plan under the European Green Deal, which aims to make all packaging reusable or recyclable by 2030 and increase the use of recycled plastics [13].

Bosnia and Herzegovina has committed to the Sofia Declaration on the GAWB (2020). It pledged to transition from a linear to a CE by adopting CE strategies, modern waste management and recycling systems, and raising public awareness. It also agreed on a regional initiative to prevent plastic pollution, including tackling marine litter [47]. As an EU candidate, it is expected to fully implement these GAWB commitments and accelerate its shift towards a circular, climate-neutral and resource-efficient economy.

Kosovo*

Legislative and regulatory framework

Legal foundation for waste management is established under the Law on Waste [48] (adopted in 2012) and its subsequent amendment (2022) [49], which updates provisions to reflect EU's principles of waste hierarchy, EPR, and waste prevention/recovery. The Waste Law authorises the Ministry of Environment, Spatial Planning and Infrastructure (MESPI) to adopt Administrative Instructions (AIs) for specific waste streams.

The most significant milestone in domestic CE framework is the Administrative Instruction (GRK) on Packaging and Packaging Wastes [50], adopted in August 2023 and amended by AI in March 2025 [51]. Together they establish first comprehensive EPR system for all packaging, within which a DRS for beverage containers serves as the main operational mechanism.

Key provisions include:

- Establishment of a DRS for PET, glass, and aluminium beverage containers (0,15 – 2,0 l),
- Full ban on the production, import, and sale of plastic carrier bags, including oxo-degradable types,
- Mandatory producer registration and reporting through the packaging register,
- Enforcement shared among the Environmental and Market Inspectorates, Customs, and the Tax Administration.

The 2025 amendment refines the DRS by defining producer categories, introducing handling and producer fees, regulating return-vending machines, and ensuring deposit refunds without proof of purchase. It also enables the government to appoint a public enterprise as DRS Administrator if private operators fail.

In parallel, Integrated Waste Management Strategy 2024–2035 (IWMS) and Action Plan 2024–2026 [52] define updated framework for waste governance and CE transition, aligned with the EU Waste Framework Directive, the EU CE Action Plan (2020), and the GAWB.

Priority measures of the Action Plan for 2024–2026 include:

- introducing EPR for packaging, WEEE and batteries,
- implementing the DRS for beverage containers,
- adopting a Programme for Waste Prevention and SUP Reduction, and
- conducting awareness campaigns on waste separation and resource circularity.

Complementing this, the CE Roadmap (2023), prepared by MESPI with UNDP support, sets strategic priorities for eco-design, reuse systems, industrial symbiosis, green public procurement, and plastics reduction, linking domestic policy vision to the EU CE Action Plan (2020) [53].

The last 2024 Kosovo* Report stated [54]:

- The implementation of waste management legislation saw some progress, with the approval of the implementing legislation on the export, import, transit and transboundary movement of waste, as well as the adoption of the legislation on packaging and packaging waste, which introduces a base for EPR and the application of the polluter-pays principle. In addition, activities aimed at reducing the use of lightweight plastic carrier bags and introducing a deposit refund system for beverage containers are taking place. Finally, the number of illegal dumpsites continued to steadily decline, from 747 in 2022 to 373 in 2023, representing a reduction of 374 illegal landfills.
- The very limited inspection capacity of the central level institutions needs to be increased as a matter of urgency. More efforts are needed to amend the Law on Waste Management and the Integrated Waste Management Strategy by introducing recycling targets, and to approve and implement the inter-municipal waste management plans. It also needs to start a reform of communal enterprises, ensure proper management of industrial and hazardous waste and boost the CE. Electricity Company (KEK) needs to

conduct the environmental and social impact assessment procedure for the hazardous waste storage

- There was no progress in aligning with the EU acquis on chemicals. The implementation of the relevant legislation remains at a low level. It still needs to improve the implementation of the regulatory framework on the export and import of hazardous chemicals

Strategies and implementation realities

A solid legislative and strategic framework for waste and packaging management was established, yet implementation remains slow and infrastructure weak. Recycling remains at around 3-4% [55], and landfilling continues to dominate disposal practices [56].

The European Commission (2024) highlights progress in adopting implementing acts on transboundary waste movement and packaging and packaging waste, establishing the basis for EPR and reinforcing the polluter-pays principle. It also notes ongoing efforts to introduce a DRS and reduce plastic-bag use [57].

Under the Integrated Waste Management Strategy 2024–2035, it aims to increase recycling to 50% and reduce landfilling by 70% by 2035, supported by new infrastructure, digital data systems, and public awareness programmes [52]. However, recycling remains very low, around 3–4 % according to KEPA (2022) [55].

Waste services are delivered by municipal and regional public enterprises under the supervision of the MESPI. The Strategy foresees the establishment of regional systems with Material Recovery Facilities (MRFs), composting plants, and stronger inter-municipal cooperation, but progress has been slower than planned due to financing and cost-recovery constraints.

The accompanying Action Plan 2024–2026 prioritises the rollout of EPR schemes for packaging, WEEE, and batteries, implementation of the DRS, and upgrades to waste-treatment infrastructure and data monitoring. Successful implementation will require closer coordination between MESPI, municipalities, and the private sector to translate domestic strong legislative framework into measurable recycling and CE outcomes.

The Administrative Instruction (AI) 07/2023, amended by AI 04/2025, has laid the groundwork for the DRS and EPR schemes. Preparations are ongoing for appointing the DRS Administrator, establishing a financial model, and launching pilot return-vending machines in major retail chains. The 2025 amendment introduced handling and producer fees, deposit traceability, and the option for the government to appoint a public enterprise as Administrator if the private consortium fails.

Institutional roles in domestic waste management system are clearly defined under the Waste Law, the MESPI oversees policy, Environmental and Market Inspectorates ensure control, and Customs and Tax Administration monitor imports and fiscal compliance. However, the European Commission (2024) [57] reports that inspection capacity remains very limited, and enforcement of new packaging and waste regulations is still at an early stage.

According to KEPA (2024) [55] and the EEA (2024) [58], coordination between institutions and municipalities remains weak, and data exchange systems are fragmented. Municipal waste operators are not yet integrated into the new EPR and DRS mechanisms, and no unified database exists to track packaging flows or return rates. The Integrated Waste Management Strategy 2024–2035 therefore foresees the creation of a waste and packaging information platform and producer registry to strengthen transparency, monitoring, and compliance across all levels of governance.

Public participation in waste management and CE initiatives is gradually increasing, supported by donor programmes and partnerships. The GIZ (2023) project Reusable Packaging Systems and Women's Participation in Kosovo* promotes community-based waste separation, reuse initiatives, and women's engagement in recycling value chains [59]. However, both the EEA (2024) and European Commission (2024) underline that consistent education, communication, and citizen involvement remain critical for achieving the targeted DRS return rates and packaging-recycling objectives of the IWMS 2024–2035.

To meet the goals of the Integrated Waste Management Strategy 2024–2035, Kosovo* must also invest in a waste and packaging database, strengthen inspection capacity, and expand public communication and education campaigns to ensure compliance with the plastic-bag ban and prepare citizens for DRS participation.

Alignment with EU and regional commitments

Waste and CE legislation show a high degree of alignment with the EU environmental acquis and the GAWB. The Law on Waste and the Administrative Instruction on Packaging and Packaging Waste transpose key elements of the EU Packaging and Packaging Waste Directive (94/62/EC) and the SUP Directive (EU) 2019/904. These acts introduce first comprehensive EPR system for packaging and a DRS.

The Integrated Waste Management Strategy 2024–2035 and Action Plan 2024–2026 [52] set measurable EU-aligned goals: 50% municipal-waste recycling and 70% landfill reduction by 2035, improved data reporting, and a producer registry consistent with the EU Waste Statistics Regulation 2150/2002/EC.

The Integrated Waste Management Strategy explicitly references the EU CE Action Plan (2020) as the guiding framework for reforms. At regional level, it participates in RCC initiatives, including the SUP Regional Project, contributing to the development of harmonised EPR/DRS systems and shared policy tools across the WB6 [47].

Institutionally, the Ministry of Environment, Spatial Planning and Infrastructure coordinates EU approximation through the Programme for Implementation of the SAA 2024–2028, ensuring continued transposition of the environmental acquis. The European Commission (2024) acknowledges moderate preparedness in the environment chapter, noting solid legal alignment but persistent gaps in enforcement, inspection capacity, and data management [60].

Overall, Kosovo* demonstrates strong regulatory convergence with EU and regional frameworks.

The next critical step is full operationalisation of the EPR and DRS mechanisms and the development of transparent monitoring systems, key for turning legal alignment into measurable progress under the RCC SUP regional objectives on plastics reduction, circular packaging, and waste prevention.

Montenegro

Legislative and regulatory framework

A new Law on Waste Management entered into force in April 2024, replacing earlier waste and packaging regulations. This law establishes the principle of EPR, making producers financially and organisationally responsible for the end-of-life of products and packaging [61]. The EPR obligations apply broadly, thus any company that manufactures, imports, distributes, or sells products (including packaging and SUP, but also other waste categories) must ensure the resulting waste is collected and managed at its own expense. To implement this, in June 2025 the government adopted a Decree on EPR defining the roles of licensed system operators (PROs) that will organise jurisdiction-wide collection and recycling schemes on behalf of producers [62].

The law introduced a ban on lightweight plastic carrier bags (15–50 micron thickness). Heavier plastic bags (>50 microns) are permitted only with a mandated fee of 0.03 EUR per bag, paid by retailers into an environmental fund (consumers pay 0.1 – 0.15 EUR per bag) [63]. The law also prohibits certain SUP products, including plastic ear swabs (except for medical use), straws, cutlery, and some food containers, all in line with EU Directive 2019/904 on SUP. Non-compliant companies can face large fines ranging from 1,000 up to 40,000 EUR, enforced via inspections. The law's intent is to prioritise reusable products and systems over SUP, embedding CE principles into regulation [64].

The 2024 law gives the government authority to establish a DRS for beverage packaging, which could be run by one or several operators in an organised network. Although not yet realised, this paves the way for a future DRS on bottles and cans to boost collection and reuse/recycling rates [61].

Overall, legislative framework now closely tracks EU norms as it incorporates EPR, SUP restrictions, packaging waste targets and economic instruments to reduce plastics. The challenge ahead is to issue remaining by-laws (e.g. on packaging waste handling) and to enforce these rules across all levels, from top level authorities down to municipal inspectors, so that the ambitious legal provisions translate into tangible waste reduction [65]. Amendments to the Law on Waste Management related to the SUP Directive and the EPR system are currently being prepared and are undergoing the adoption process.

The Ministry of Ecology, Sustainable Development and Northern Region Development (Ministry of Ecology) and its Environmental Protection Agency (EPA) will be key in monitoring compliance, while the Eco-Fund is designated to channel collected fees (such as the bag levy) into public awareness and waste-reduction projects.

The chemical law centres around aligning with EU standards (REACH, CLP) via the primary Law on Chemicals (2017) and associated regulations, covering chemical registration, classification/labelling (GHS), risk management, POPs, and biocides, with recent updates (2025) banning certain Perfluoroalkyl and Polyfluoroalkyl Substances (PFAS) chemicals and strengthening POP controls, all managed by the Ministry of Ecology and the EPA.

The last Report highlights [65]:

- To allow proper implementation of the Law on Waste Management, the government adopted 21 implementing acts over the reporting period, and the work is ongoing on additional acts, to ensure its implementation. The waste management plan for the period 2025-2029 was adopted in October 2025, an important development laying the foundation to transition to a CE and gradually reduce the amount of waste ending up in landfills, while simultaneously increasing the recycling rate, protecting citizens' health, and preserving the environment. As from October 2024, Montenegro started to implement the ban on placing plastic bags with a thickness of 15-50 microns and the use of single use plastic products. This ban produced positive results with certain retail chains recording a reduction in the use of plastic bags overall by around 50% between October 2024 and January 2025 compared to the same period the previous year. Media awareness-raising campaigns and stronger enforcement measures targeting citizens and local authorities are still needed to improve waste prevention, source separation, and recycling.
- In May 2025, Montenegro adopted the report on the implementation of the 2024 Action Plan under the Chemicals Management Strategy 2024-2025. At the same time, additional awareness-raising and enforcement efforts are still needed in relation to waste prevention, separation, and recycling.

Strategies and implementation realities

Strategic documents recognise the need for a CE in waste management, but implementation has significantly lagged behind the goals. The Waste Management Strategy 2015–2030 set out objectives such as a functional and integrated waste management system and EU-aligned targets for recycling. For instance, Montenegro was supposed to recycle 50% of municipal waste by 2020, including large shares of plastic, paper, metal and glass packaging [66]. In reality, current recycling rates are extremely low. As of 2023, less than 15% of total waste was recycled [67]. Essentially, it is far from European standards (44% overall recycling rate, and 49% for municipal waste), and achieving a 50% recycling rate would require a steady increase in performance [68].

A core issue is the lack of infrastructure and incentives for separate collection and recycling of waste, especially plastics. Municipal public utility companies handle about 90% of waste collection, serving roughly 88% of the population (as of 2023, Monstat). Where collection exists, it is predominantly one-stream (mixed waste), only a few municipalities have piloted two-bin or multi-bin separation, and these efforts have yielded poor results due to insufficient follow-up and public motivation. There are no incentives for households or businesses to sort waste at source (no fee rebates or penalties), and until recently, mixed waste and sorted waste

cost the same to dispose, removing economic drivers for recycling. Local governments often struggle financially as waste fees are low and collection rates from residents are poor, leaving municipal companies under-resourced [69]. This means that even basic services, let alone new recycling facilities are difficult to fund. The Environmental Protection Agency's data show virtually all municipal waste ends up in landfills or dumpsites, of which only a couple have recycling facilities while others are outdated. Plans to build regional recycling centres and modern landfills have faced delays, so landfill closure targets (e.g. to close all non-compliant dumps) will be difficult to meet [70].

The new EPR programme is intended to change this trajectory by shifting financial responsibility to producers and importers of packaging and other products. However, implementation is just beginning. The EPR concept was previously on paper but not operational. Only in 2024 did the law mandate EPR compliance, and as of 2025 Montenegro is establishing PROs and data reporting systems. It will take time for producers to organise and finance collection schemes for packaging waste. Municipalities are the de facto managers of plastic waste and packaging until those systems are fully operational. Coordination between high level and local levels is crucial as the law now obliges local authorities to integrate separate collection of packaging waste (e.g. drop-off points or curb side programmes) as part of municipal waste plans, with costs reimbursed by producer fees. Currently, many local authorities need capacity building and equipment to roll out such systems [62].

Other CE measures are at an early stage. The new legal provision for DRS is a welcome step, and it is anticipated that a DRS for PET bottles and cans may be developed in coming years, learning from neighbouring Croatia and Serbia's experiences. Reuse and refill systems are likewise nascent. Refillable glass bottle usage (common in some European markets) is minimal in Montenegro's beverage industry, and there are no formal reuse targets in policy yet. Up to now, the strategic focus has been on building basic waste management infrastructure rather than sophisticated reuse loops [69]. Still, the 2022 CE Roadmap (developed with UNDP) emphasizes promoting reuse models in the long-term and cites the need for systemic change in consumption patterns [71]. A few grassroot initiatives have appeared (e.g. zero-waste shops, refill stations in supermarkets, and NGO-led campaigns to eliminate SUP in events), but these remain small scale.

Alignment with EU and regional commitments

As an EU candidate, Montenegro is committed to aligning its policies on plastic packaging and waste with European standards. The 2024 Waste Management Law was explicitly a step towards harmonising with the EU acquis, incorporating requirements of the EU Waste Framework Directive and the Packaging and Packaging Waste Directive. Its new rules on SUP directly mirror the EU's SUP Directive 2019/904, banning the same items and introducing similar measures (e.g. plastic bag restrictions and fees). In doing so, it joins regional neighbours and EU Member States in combatting plastic pollution.

Montenegro has also adopted EU-aligned targets, i.e. the strategy and legislation call for 50% of municipal waste to be recycled, matching the EU's recycling goals. Similarly, packaging waste recovery and recycling targets are being updated to meet EU levels (with new targets for

recycling plastic packaging likely around 50–55% by 2025–2030, in line with EU Directive 94/62/EC). However, the European Commission notes that while laws are increasingly aligned, implementation and enforcement must improve. In its 2024 report, the Commission assessed Montenegro as having "some level of preparation" on Chapter 27 (environment) and applauded the adoption of the waste law, but urged authorities to "significantly intensify work" on executing these policies and meeting closing benchmarks. This includes developing the pending Waste Management Plan (2025–2030) and ensuring all municipalities adopt local waste plans consistent with EU principles [65].

The Sofia Declaration on the GAWB was also endorsed, pledging to move towards a CE, reduce waste and marine litter and align with EU CE policies as a region. Montenegro collaborates with international organisations on waste and plastics as well, e.g. it participates in EU-funded regional projects and has partnered with UNEP and UNDP on initiatives to fulfil obligations under global conventions (Basel Convention on waste, etc.) [72]. Furthermore, as a Mediterranean coastal WB6, Montenegro aligns with EU Marine Strategy policies and the Barcelona Convention's Regional Plan on Marine Litter, aiming to curb plastic leakage into the Adriatic Sea.

North Macedonia

Legislative and regulatory framework

The responsible institution for waste management is the Ministry of Environment and Physical Planning. The legal framework on waste management in North Macedonia includes:

- Law on Waste Management,
- Law on Management of Packaging and Packaging Waste,
- Law on Management of Batteries and Accumulators and Waste Batteries and Accumulators,
- Law on Management of Electrical and Electronic Equipment and Waste Electrical and Electronic Equipment,
- Law on Ratification of the Basel Convention on the Control of Transboundary Movements of Hazardous Wastes and their Disposal, and
- List of types of waste.

Law on Waste Management provides the framework for policy, including the development of strategies, plans, and programmes. Authorities are working to harmonise their legislation with the EU and are transitioning from a system of individual landfills to a system of regional waste management centres, which will include new infrastructure like sanitary landfills and mechanical-biological treatment plants. Additionally, a new Law on Waste Management was published in 2019, prescribing the following measures:

- Closure of all non-compliant landfills,
- Regional collection, transport, selection and recycling of waste, as well as its treatment and utilisation,
- Establishment of a functional system for regional waste management and construction of regional landfills. Such regional waste management systems are designed to reduce

landfilling and increase the processing and recycling of waste, reduce illegal dumping to enhance environmental protection and municipal revenue streams, increase employment, develop a CE leading to better resource use, and align domestic with European legislation in the field of waste management.

A newer package of laws passed in 2021 further aligns waste management system with EU standards. In North Macedonia, packaging waste is primarily regulated by the Law on Packaging and Packaging Waste, originally adopted in 2010. This law introduced an EPR scheme and has since been updated to align with EU regulations.

The government and the domestic institutions announced that as from 2020 they will no longer procure plastic products and single-use packaging. A rulebook on managing plastic packaging bags placed on the market was adopted in 2021 [73] .

Under the EPR system, companies that place packaged products on the market are responsible for managing the packaging waste at the end of its life cycle. Companies can fulfil their obligations either individually or by joining a collective scheme. Most producers join a PRO. For example, Pakomak was the first company licensed to manage packaging waste. Producers are responsible for the costs of collecting, sorting, recovering, and recycling packaging waste.

In March 2024, the Environmental Administration informed that all producers have an obligation to register in accordance with the Law on EPR for the management of special waste flows and the Rulebook on the form and content of the request for registration by the producer [74].

North Macedonia regulates chemicals through a comprehensive legal framework centred on the Law on Chemicals, which is broadly aligned with EU standards, including REACH and CLP. This framework governs the authorisation, classification, labelling, including bilingual requirements, and overall management of chemicals. Several key ministries, including those responsible for health, environment, economy, and agriculture, play a role in defining and implementing rules for hazardous substances, new chemicals, and specific product groups such as plant protection products and cosmetics. The system is further complemented by legislation on waste management, transport, and industrial emissions. Its main objectives are to protect human health and the environment while progressively harmonising domestic legislation with the EU acquis as part of North Macedonia’s accession process.

The authorities are aligning their chemical regulations with EU standards, adopting the GHS for classification/labelling (already in place for substances/mixtures) and moving towards EU-style REACH principles for chemicals (Registration, Evaluation, Authorisation, Restriction) as part of their Green Agenda and EU integration, focusing on CE and better chemical management.

The North Macedonia 2025 Report stated [75]:

- On waste management, implementation remains a significant challenge across the sector. The strategies for waste management and sludge management still need to be adopted. The authorities submitted a formal request to the European Commission related to information listed in Annex VIII to the Waste Shipment Regulation,

requesting the possibility to import from the EU 18 waste streams from the list of non-hazardous waste. Regional waste management structures are not functional and the municipal utility enterprises are not operating efficiently. Further delays are being encountered in establishing a regional waste management system across North Macedonia. No tangible progress was made in the northeast and east regions, despite the significant financial assistance provided. The process is still affected by a lack of ownership and commitment from local authorities, and weak interinstitutional relations and decision-making.

- Implementation of the CE is stagnating. Limited stakeholder awareness and knowledge, insufficient financial means and infrastructure limitations continue to be the main challenges.
- The EPR has not yielded the anticipated improvements and continues to face a range of persistent challenges. The number of PROs continues to increase, but without sufficient supervision it may seriously jeopardise market functioning and undermine achievement of the North Macedonia targets.

Strategies and implementation realities

The Waste Management Strategy 2008–2020 emphasises the need to decrease the quantities and hazardous potential of waste generated, to recover the material and energy value of waste and to ensure environmentally acceptable final disposal. Priorities include establishing systems for the separate collection of waste, setting up EPR schemes and modernising the infrastructure on the regional level to achieve adequate economic thresholds for investments in waste management facilities. Facilities for hazardous waste need to be established, and the remediation of contaminated non-compliant municipal and industrial landfills is required.

The Plan for Waste Prevention (2022–2028) sets out specific measures for the public and private sectors to reduce waste and promote a CE. Waste prevention is an integral part of the comprehensive transformation towards a CE. It reduces the input of natural resources into the economy as well as the necessary efforts to collect and recycle waste. Driven by their commitment to sustainable economic growth, environmental stewardship, and regional and EU integration, the authorities are increasingly adopting CE principles.

North Macedonia must address economic and environmental challenges arising from increasing demand for raw materials. In addition to tackling these issues, its pursuit of EU membership and commitment to the GAWB act as key motivators for its efforts in the CE sector. As it works towards EU membership, authorities are strategically aligning its environmental policies with established EU standards and regulations. There is a noticeable rise in initiatives aimed at improving energy and resource efficiency, reducing waste, promoting recycling, and adopting eco-friendly practices, highlighting a shared dedication to reducing environmental impact. However, these efforts require further reinforcement.

The roadmap for a CE, developed with support from the EU and OECD and launched in March 2024, outlines over 40 policy recommendations across five key sectors. It aims to establish a robust policy framework to guide the transition, building on existing strategies like the Law on Waste Management (2021) and Plans for Waste Management and Prevention. Its key objective

is to improve inter-institutional coordination and stakeholder collaboration to drive the transition, aligning with the EU's CE goals. The OECD analysis and stakeholder consultations identified five priority areas where CE reforms would have the most significant impact:

- circular business models for small and medium-sized enterprises (SMEs),
- construction,
- biomass and food,
- textile industry, and
- mining and metallurgy sectors.

A cohesive approach is imperative to guide authorities towards a CE. This involves constructing the necessary infrastructure, cultivating awareness of the concept and offering financial incentives to drive the transformation.

Alignment with EU and regional commitments

Following the first Intergovernmental Conference on accession negotiations in July 2022, the screening sessions for all six clusters were completed in December 2023. The Stabilisation and Association Agreement continues to be implemented, and the joint bodies under the agreement meet. North Macedonia has consistently affirmed its political commitment to the strategic goal of EU integration and its ambition to advance in the accession negotiations.

The authorities have actively engaged in the implementation of the new Growth Plan for the WB6 across its four pillars: (i) gradual integration with the EU single market, (ii) regional economic integration, (iii) fundamental reforms, and (iv) increased financial support. Its Reform Agenda covers reform milestones in the areas of: (i) governance, public administration reform and public financial management, (ii) green and digital transition, (iii) human capital, (iv) private sector development and business environment, and (v) fundamental rights and the rule of law.

North Macedonia has some level of preparation in this area. Limited progress was made during the reporting period, particularly in waste management, through the adoption of a law that expands producers' responsibility. Authorities are encouraged to enhance North Macedonia’s civil protection operational capacity and coordination with the Union Civil Protection Mechanism.

The Commission’s recommendations from last year were not fully addressed and remain valid. In the coming year, the authorities should:

- Strengthen their administrative and inspection capacities for implementation and enforcement of the environmental acquis significantly, implement structural reforms in all sectors and ensure that there is an institutional structure in place to deliver coordinated, strategic planning for environmental investments,
- Make the regional waste management system in the Eastern and Northeastern regions operational,
- Adopt the Law on Climate Change, consistent with the EU 2030 framework, implement the NECP and the Energy Community's Decarbonisation Roadmap, focusing on the monitoring, reporting, verification and accreditation (MRVA) package to introduce

carbon pricing and align with the EU emission trading scheme (EU ETS) and make the climate change unit within the Ministry of Environment and Physical Planning operational.

Serbia

Legislative and regulatory framework

The European Environment Agency (EEA) reports that municipal solid waste (MSW) generation was 473 kg per capita in 2022, below the EU average [76]. Serbia faces challenges with a low recycling rate of around 15.5% in 2023, a high percentage of waste landfilled without proper treatment, and many non-compliant landfills, despite closing some and building new sanitary landfills with EU support.

The Law on Waste Management establishes the legal framework for waste prevention, including the development of cleaner technologies and the rational use of natural resources. It also regulates measures to reduce the adverse impacts of waste on human health and the environment, promote reuse and recycling, support the recovery of secondary raw materials and energy from waste, govern disposal methods, rehabilitate unregulated dumpsites, and monitor waste management practices.

The new Law on Waste Management further strengthened this framework by clarifying the conditions under which a material may be recognised as a by-product and under which waste may cease to be waste. In particular, Articles 10, 11 and 12 regulate the proof of compliance for by-product status, the conditions for end-of-waste status, and the establishment of the register of by-products and the register of waste that has ceased to be waste. These provisions are important for the circular economy because they create a legal basis for certain waste streams to re-enter the market as secondary materials, which can also encourage the separate collection and valorisation of reusable and recyclable fractions.

In addition, Article 50 is particularly relevant for the application of circular economy principles. It requires the competent waste management authority to take appropriate measures to encourage reuse and preparation for reuse of products, notably through the development of repair and reuse systems, the use of economic instruments, public procurement criteria, and other policy measures. The same article also requires measures to ensure, promote, and improve waste recovery, including separate collection where this is technically, environmentally, and economically feasible.

The Law governs packaging waste regulations and a new Packaging Waste Reduction Plan (Regulation on establishing the packaging waste reduction plan for the period from 2025 to 2029), which aims to meet EU targets through increased separation, investment in infrastructure by operators, and clear responsibilities for producers. Legal entities must separate their waste and hand it over to an authorised collector, using a Waste Movement Document for tracking. The main objective of the Regulation on establishing the packaging waste reduction plan for the period 2025-2029 is to enable the separate collection of household packaging waste suitable for recycling through designated collection containers.

Instead of the Ministry of Environmental Protection (MEP), EU funds or local governments, investments in collection infrastructure will be implemented by EPR organisations, i.e. operators of the packaging waste management system.

The management of packaging waste is based on the EPR principle and regulated by the Law on Packaging and Packaging Waste (LPPW). According to LPPW, each company that places more than 1 ton of packaging on the domestic market is obliged to meet the targets defined by the MEP. The obliged companies can meet their responsibilities by (i) transferring their obligations to an authorised operator–producer responsibility organisation, (ii) independently managing packaging waste (with a valid permit), or (iii) paying domestic compensation according to the Law on Fees for the Use of Public Goods. The recycling and recovery targets for packaging waste are comparable to those in EU member states.

Serbia is in the process of aligning its legislation on SUP with the SUP Directive (EU) 2019/904. However, full harmonisation has not been achieved yet. The strategic framework is primarily governed by the Waste Management Programme 2022–2031, which aims to increase recycling and reduce plastic waste.

Particular attention has been devoted to the issue of plastics through EU Directive 2019/904, commonly known as the SUP Directive. This Directive has received partial transposition under Serbia's Packaging Waste Act; nevertheless, comprehensive alignment with EU standards remains outstanding.

The MEP is the central authority in charge of all environmental affairs, including waste management. In some cases, the Ministry transfers responsibilities to lower tiers of administration, such as the Autonomous Province of Vojvodina, regions and local administrations (cities and LSGs).

The Law on Chemicals aligns with EU regulations (like REACH/CLP) to manage risks, requiring classification, labelling, SDSs, and registration (though some EU-specific procedures need full EU membership). Key aspects include rules for manufacturers/importers, chemical safety data sheets (SDS), permits for hazardous substances, and a registry for chemicals, focusing on protecting health/environment throughout the lifecycle, with specific rules for transport, waste, and accidents, while exempting certain product categories like medicines or food.

According to the European Commission's 2025 Report on Serbia [75], it was stated that, regarding waste management, Serbia had a good level of alignment with the EU acquis; however, implementation progressed slowly and remained limited. The waste prevention plan 2025–2030 together with four implementing laws was adopted during the reporting period. There is still a need to implement extended producers' responsibility system for specific waste streams in accordance with the polluter-pays principle. The Duboko waste management centre was closed, leading to the waste being redirected to other sanitary landfills. Landfill fires broke out in several cities during the summer 2025, prompting emergency actions from central and local authorities. Efforts at closing unsanitary landfills are ongoing and should intensify. At the same time, capacities have been expanded in the Pirot region, where a bio-waste composting

facility is being commissioned, disposal capacities have been increased in Lapovo, and the permit-issuance procedure for the Kalenić region is currently underway. The Belgrade waste incinerator has been operational since November 2024. The Parma declaration for prevention of diseases caused by exposure to asbestos was ratified, and the Ostrava declaration supporting provisions of the Parma declaration.

Serbia has a high level of alignment with the EU acquis on chemical management.

Strategies and implementation realities

The Waste Management Programme 2022-2031 aligned with EU policies and accession was published in 2022. This newest waste programme includes goals to increase the recycling rate of municipal waste, reduce landfilling of biodegradable waste, and establish separate collection of paper, metal, plastic, glass, and textiles by 2029. Key selected objectives are:

- Increase the recycling rate of municipal waste to 25% by weight by 2025 and 35% by 2030,
- Increase the rate of preparation for reuse and recycling of municipal waste to a minimum of 55% by weight by the end of 2025 and a minimum of 60% by weight by the end of 2030,
- Increase the bio-waste recycling rate to 20% by 2025 and 40% by 2029,
- Increase the recycling rate of paper and cardboard to 25% by 2025 and 35% by 2029,
- Reduce waste disposal in unsanitary landfills to 0% by 2034 [77].

Key regulations include the Waste Prevention Plan adopted in March 2025, which sets objectives and measures for the period 2025-2030, and mandates legal entities to adhere to specific rules for waste management, such as contracting with licensed operators for packaging waste. The prevention plan defines the general prevention objectives and measures, as well as assessments of prevention measures or other appropriate measures which may have an impact on: 1) the general conditions of waste prevention, 2) the design, production and distribution of products, 3) the phase of consumption and use of the product.

The Law on Packaging and Packaging Waste introduced the principle that economic entities are obligated to cover the costs of collecting and processing packaging waste they place on the market. The government has updated domestic reuse and recycling targets and introduced new reporting rules to improve management of packaging waste. Serbia has also announced plans to introduce a DRS for packaging.

Serbia has developed a roadmap for the CE, recognising plastics and packaging as one of the four priority sectors for improvement. CE principles play an essential role in the transition to a green economy. The government, together with various development partners, including UNDP and GIZ, has contributed to the process to understand better and draft a roadmap towards domestic circularity. The 2022–2024 CE Development Programme was adopted, which defines priorities for the three years and lays the groundwork for the further development of a CE. One of the programme's specific goals includes supporting businesses in removing waste from the supply chain, recycling materials and components, switching to renewable

energy, and extending the lifespan of their products [78]. The EU for CE project aims to support transition towards a CE, aligned with the GAWB and EU accession process [79].

The roadmap aims to encourage the private sector to adopt circular business models, motivate industry to create new jobs, and inspire a shift in business operations through the introduction of innovative and sustainable solutions. The roadmap has been developed by the CE Platform for Sustainable Development project, which was initiated and implemented by the UNDP.

The SUP Directive has received partial transposition under Packaging Waste Act; nevertheless, comprehensive alignment with EU standards remains outstanding. The Statistical Institute reported that 67,355 tonnes of non-hazardous plastic waste were generated in 2023, of which 56,513 tonnes were successfully recycled.

To encourage and promote CE in the local context, the MEP and the UNDP, in partnership, have been implementing the project "Reducing the carbon footprint of local communities by applying the principles of the CE - Circular Communities", with the financial support of the Global Environment Facility (GEF), from March 2022 until March 2027.

A digital platform for the CE has been launched within the Chamber of Commerce and will indirectly benefit representatives of domestic administration, local self-government, and the professional public [80]. Through its functions, the CE HUB classrooms will contribute to increasing the capacity of businesses and other relevant stakeholderson the path of change towards green investments, green recovery from the COVID-19 crisis and growing competitiveness on the European market by implementing new circular ways of doing business. CE HUB's mission is to accelerate the transition to a CE and help companies improve their business activities in the context of the GAWB.

Alignment with EU and regional commitments

Since the opening of the accession negotiations in January 2014, 22 out of 35 chapters have been opened. All chapters in cluster 1 on the fundamentals and all chapters in cluster 4 on the GAWB and sustainable connectivity have been opened. The Stabilisation and Association Agreement (SAA) has continued to be implemented. Serbia needs to continue aligning its legislation to reach full compliance with the SAA. The last Report under cluster four from European Commission emphasized that the institutional framework is in place but should be improved as the environmental sector competencies are scattered across several ministries. The overall coordination and capacity of local self-governments and public utility companies, particularly in the water sector, should be enhanced [81].

Serbia has a certain level of preparedness in the areas of environment and climate change. Good progress was made, namely on waste management legislation, integrated permits for industrial pollution control, adoption of the Climate Change Adaptation Programme and the NECP. Regarding waste management, a good level of alignment with the EU acquis was noted.

The Commission’s recommendations from last year were partially implemented and remain largely valid, particularly regarding the priority reforms needed. In the coming year, the authorities should in particular:

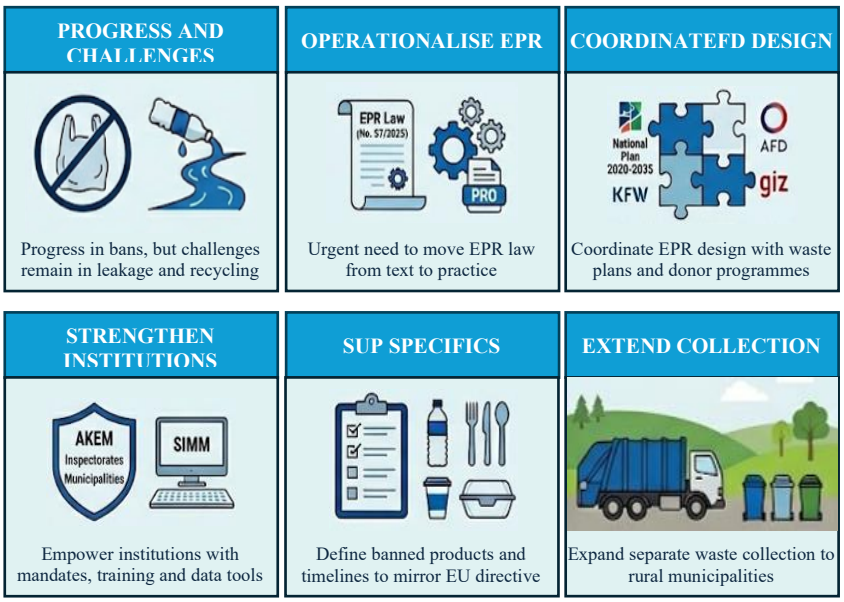
- Implement measures set out in: (i) the action plan for administrative capacity development, (ii) the low carbon development plan, and (iii) the programme on air protection, and improve the institutional set-up and ensure coordination within the government,
- Adopt legislation in line with the EU acquis on Environmental Impact Assessment (EIA), Strategic Environmental Assessment (SEA) and the Environmental Crime Directive, ensure that all infrastructure investments comply with the EU environmental and climate acquis and international nature and water obligations, and ensure public participation,
- Implement commitments under the Energy Community's Decarbonisation Roadmap, particularly regarding the MRVA with a view to introducing carbon pricing and aligning with the EU ETS.

In July 2024, Serbia and the EU signed a Memorandum of Understanding (MoU) launching a Strategic Partnership on sustainable raw materials, battery value chains and electric vehicles. The Partnership aims to support the development of a sustainable supply chain and the creation of new job opportunities in industrial sectors that are crucial for the future. The MoU underlines the importance of promoting the highest environmental, social and governance standards.

Transboundary cooperation did not improve during the reporting period. Serbia should continue its efforts to cooperate with its neighbouring WB6. It should start implementing the activities of the memorandum of understanding on cooperation in the field of environmental protection with Bulgaria.

Annex 2. Specific recommendations for each WB6

Albania has taken important first steps on SUP, notably through the ban on lightweight plastic bags and oxo-degradable plastics, but high levels of plastic leakage into rivers and the Adriatic, and low recycling rates show that the system is still far from effective. The most urgent task is to translate recent legal reforms into a functioning operational model.



This implies that the EPR Law (Law No. 57/2025) and its implementing decisions must move from text to practice, with clear accreditation of PROs, transparent fee structures, and robust compliance monitoring for producers and municipalities.

The EPR system should be designed as the financial backbone for plastics and packaging management, closely coordinated with the Integrated Waste Management Plan 2020–2035 and with programmes supported by KfW, AFD and GIZ. Producer fees should leverage, not duplicate, existing investments in material recovery facilities, composting and future DRS pilots. At the same time, enforcement and institutional coordination remain a critical bottleneck. The AKEM, inspectorates and municipalities need clear mandates, regular training and tools to ensure that obligations are applied consistently. Full deployment of the SIMM digital platform is central to improving data reliability and transparency, including links to EPR registries and customs information.

On SUP specifically, Albania should use forthcoming secondary legislation to define a clear list of banned or restricted products and timelines that prioritise high-impact items. This list should mirror the structure of the EU SUP Directive while reflecting domestic conditions. Extending separate collection for plastics, paper, glass and bio-waste to rural municipalities, where service coverage is still low, will be essential to underpin these measures.

It should actively use RCC and other regional platforms to harmonise definitions, targets and reporting, and to exchange experience on EPR, DRS and marine litter. Fiscal and financial incentives, green public procurement and targeted awareness campaigns will be needed to support businesses and consumers in shifting towards recyclable packaging and reuse models, and to stabilise circular markets for recycled content.

In Bosnia and Herzegovina, constitutional fragmentation shapes every aspect of plastics and packaging policy. EPR schemes operate separately in the Federation of Bosnia and Herzegovina and Republika Srpska, while Brcko District still lacks a comparable mechanism. This creates regulatory gaps and raises costs for producers active across the whole territory. The first priority is therefore to complete and harmonise SUP transposition and related measures across entities and Brcko District, based on a jointly agreed roadmap.

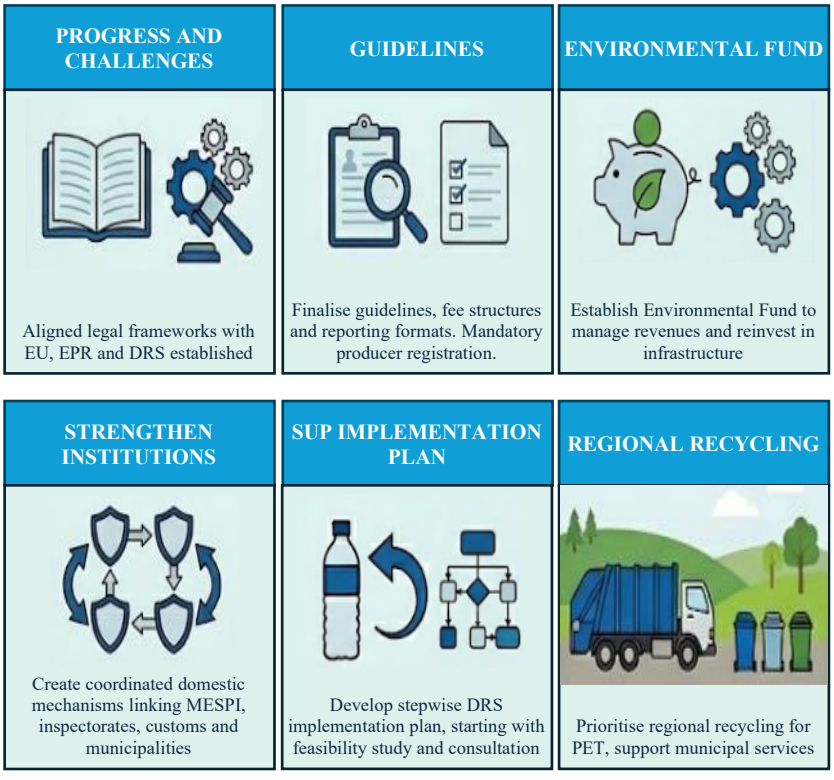
Environment ministries in both Federation of Bosnia and Herzegovina and Republika Srpska, together with MoFTER and Brcko District authorities, should agree on a common set of bans, restrictions and product requirements for the priority SUP products.

Studies suggest that a large share of packaging placed on the market remains undeclared, depriving the EPR system of the revenue needed to finance collection and recycling. Both entities have recently updated their packaging rulebooks, raising targets and clarifying municipal and PRO obligations, but enforcement remains weak. Strengthened, coordinated inspections, including joint planning of inspection campaigns across entities, are needed to identify free-riders and under-reporting PROs and to ensure that collected fees are channelled into municipal separate collection infrastructure rather than absorbed by administrative costs. Brcko District should design an EPR scheme compatible with both entity systems so that the whole territory is covered.

Given the rising importance of beverage containers, Bosnia and Herzegovina should prepare a realistic roadmap towards a DRS for PET bottles and cans. Initial steps include an economic and technical feasibility assessment, consultation with industry and utilities across entities, and consideration of governance options that can function in a multi-level institutional environment. In parallel, entity-level planning should prioritise separate collection infrastructure, with clear obligations and incentives for municipalities and cantons to roll out and maintain systems.

Stakeholders explicitly framed SUP phase-out as an economic issue that requires careful analysis. Before adopting bans, Bosnia and Herzegovina should carry out an economic impact assessment of proposed measures on businesses and municipalities, and design targeted support measures, especially for SMEs and the tourism and hospitality sectors, to ensure a just and feasible transition.

Kosovo* has made notable progress in aligning its legal framework with EU requirements, particularly through recent packaging and SUP related regulations that establish EPR and mandate a future DRS for beverage containers. Enforcement capacity needs to be strengthened through a coordinated domestic mechanism that links MESPI, market and environmental inspectorates, customs and municipalities. Clear inspection plans, standard operating procedures and regular reporting are required, together with specialised training for inspectors on EPR, DRS and SUP enforcement.



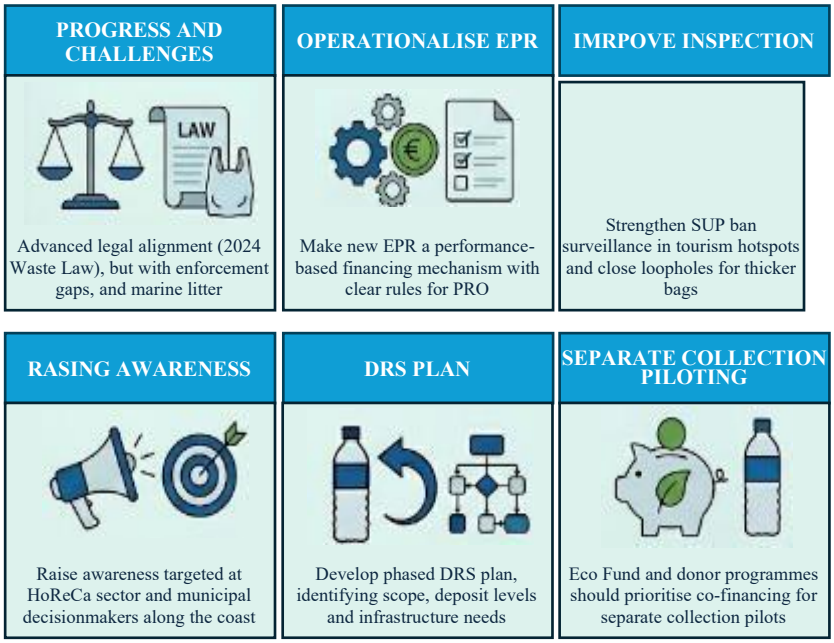
Operationalising EPR and DRS should be treated as a strategic priority for the next five years. For EPR, a detailed guidelines for producers and PROs should be finalised and published, including fee structures, reporting formats and performance expectations. Mandatory producer registration and active monitoring are essential to address free-riding. Establishing an Environmental Fund to manage EPR and DRS revenues, and to reinvest them in collection, sorting and recycling infrastructure, will be key to building a credible system. On the DRS side, the legal framework already foresees a domestic administrator and consumer friendly refund conditions. These need to be translated into a stepwise implementation plan with a realistic timeline, starting from a full feasibility study and stakeholder engagement with retailers and beverage producers.

Regional recycling facilities for PET sorting and plastics recycling should be prioritised and linked to improved municipal collection services. Municipalities, particularly along main transport corridors and in urban centres, need support for equipment, logistics and technical assistance. Where feasible, informal collectors should be integrated into formal value chains.

A centralised digital platform should be developed to track packaging placed on the market, separate collection, recycling performance, and imports and exports of waste and secondary raw materials. This platform should integrate EPR and DRS data and require standardised annual submissions from PROs, municipalities, recyclers and producers. At the same time, businesses will need support in transitioning to recyclable or reusable packaging through grants, tax incentives, eco-modulated fees and technical assistance, especially for SMEs.

Behaviour-change campaigns on DRS participation should be scaled up, waste separation and SUP reduced, focusing on high-impact items such as PET bottles, plastic bags and takeaway packaging.

Montenegro combines relatively advanced legal alignment with persistent practical challenges. The 2024 Waste Law and accompanying EPR decree provide a solid legal basis for EPR and a future DRS, and a broad set of SUP bans has been introduced. Yet interviews highlight enforcement gaps, continued use of thin produce bags and certain SUP items, and high levels of litter in tourism-intensive coastal areas.



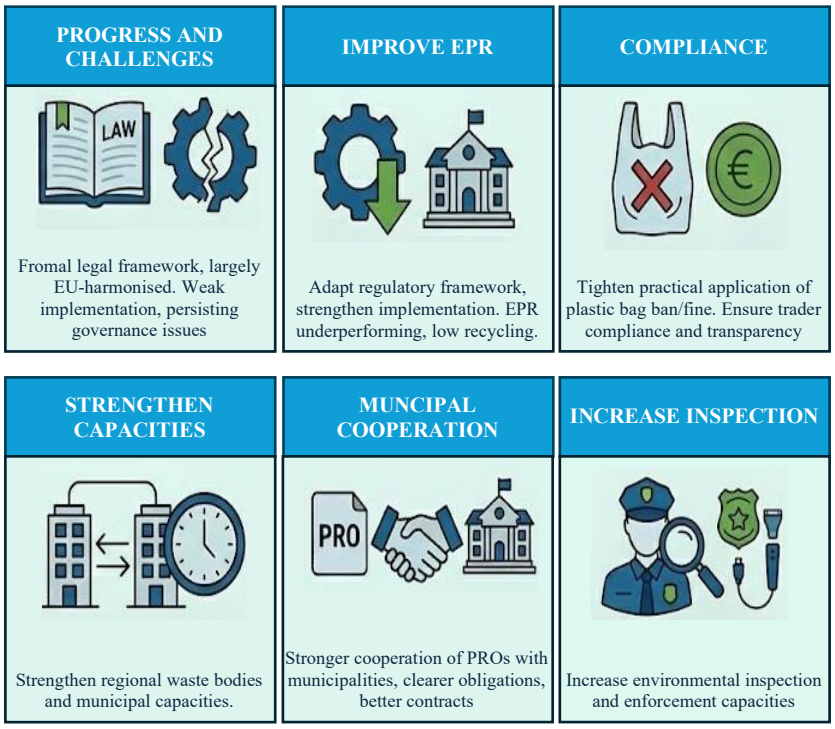
The first recommendation is to operationalise the new EPR system so that it becomes a predictable, performance-based financing mechanism. It needs clear rules for PRO accreditation, fee structures and target setting, as well as transparent reporting obligations and oversight procedures. Predictable EPR fees will allow operators and municipalities to plan and finance collection, logistics and recycling, including exports where local processing capacity is limited.

Market surveillance and inspection should be strengthened on SUP ban implementation, particularly in coastal municipalities, ports and tourism hotspots, and accompanied by clear guidance for businesses on permissible alternatives. It is essential to close loopholes that encourage a shift from lightweight to thicker bags, which increases plastic tonnage while maintaining formal compliance. Awareness campaigns targeted at the HoReCa sector and municipal decision-makers along the coast can reinforce these efforts.

Montenegro should also capitalise on its legal readiness to develop a phased plan for introducing a DRS for beverage packaging. This plan should identify the scope of containers, deposit levels, operator model and infrastructure needs, while managing the specific challenges of a tourism-driven economy with strong seasonal peaks. In parallel, the Eco-Fund and donor-financed programmes should prioritise co-financing for municipal separate collection and for small-scale reuse and refill pilots in tourism, retail and the beverage sector.

North Macedonia has a formal legal framework for packaging and SUP that is largely harmonised with EU directives, including a prohibition on certain plastic bags and a fee on permitted biodegradable bags. However, implementation is weak and key governance issues persist. The ban on conventional plastic bags and the fee system for biodegradable bags have not delivered the expected behavioural change, and very lightweight bags under 15 microns continue to pose problems in practice.

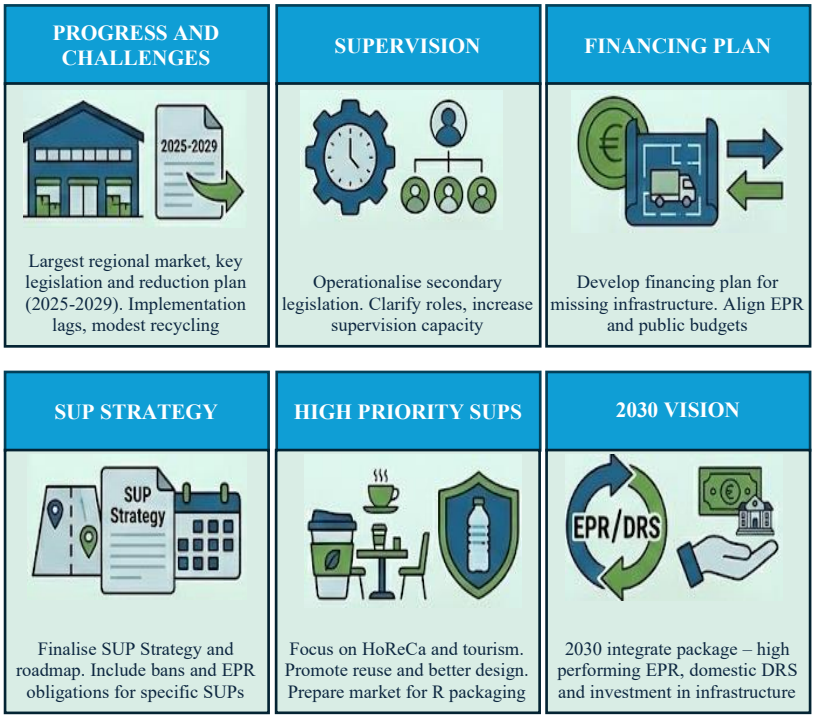
A key recommendation is to adapt the regulatory framework to local conditions and strengthen its implementation. This includes tightening the practical application of the plastic bag ban and fee system, ensuring that traders comply with obligations, and that revenues are used transparently for environmental purposes. The existing EPR system is legally structured but underperforming as recycling rates remain low, collection services are uneven and municipal cooperation is incomplete. Projects on digitalising primary selection have helped, but the system is still far from fully effective.



Regional waste management structures are not fully functional, municipal utilities face efficiency challenges, and the establishment of regional waste systems has been delayed despite significant financial assistance. These problems reflect a lack of ownership by local authorities, weak inter-institutional relations and slow decision-making. Strengthening regional waste management bodies and municipal capacities, as envisaged in the Waste Management Plan 2021–2031, should be treated as a core priority.

North Macedonia should therefore focus on improving EPR performance and separate collection infrastructure, with particular emphasis on strengthening cooperation between PROs and municipalities. Clearer municipal obligations, better contractual arrangements, and targeted funding to expand separate collection and sorting are needed. At the same time, environmental inspection and enforcement capacities must be increased. Inspectors at domestic and regional level require additional staff, training and equipment, so that they can effectively monitor compliance with SUP, EPR and broader waste regulations.

Serbia, as the largest market in the WB6, has significant leverage over regional plastic and packaging flows. It has already adopted key legislation on waste management and packaging, and operates EPR schemes, including a new Decree establishing a Packaging Waste Reduction Plan for 2025–2029. However, implementation lags behind formal transposition, recycling rates remain modest, and SUP specific policies are fragmented.



The first recommendation is to accelerate the implementation of the existing legal framework and to make secondary legislation more operational. This means clarifying roles and responsibilities across ministries, inspectorates, PROs and municipalities, and increasing the capacity of institutions responsible for supervision and planning. A clear plan for financing missing waste management infrastructure should be developed, including collection and transport equipment, sorting facilities and recycling capacity, so that EPR and public budgets are aligned rather than working in parallel.

Strategy on SUP should be finalised and adopted, building on the draft action plan prepared in 2022, and use it to establish a time-bound roadmap. The strategy should include bans and restrictions on high-priority items, EPR obligations for specific SUP product groups, measures to promote reuse and well-designed awareness actions. Special attention should be given to the HoReCa sector and tourism, where single-use foodservice items dominate urban litter but can be replaced with reusable alternatives or better-designed single-use items.

Serbia should work with users, operators and producers to prepare the market for reusable and recyclable packaging, clarify the main barriers, including capital costs, regulatory uncertainty, limited supply of recycled content and lack of standardised reverse logistics, and design measures to address them.

Looking to 2030, it should aim for an integrated package that combines a high-performing EPR system with a domestic DRS for beverage packaging and targeted public investment in collection and sorting infrastructure. EPR, particularly if fees are modulated for recyclability and reuse, will provide continuous financing and market incentives for better design. A DRS for bottles and cans can rapidly increase capture rates and supply high-quality recyclables, making local recycling plants viable. Public loans and grants can then address remaining infrastructure gaps, creating a coherent pathway towards EU-consistent plastics management.

Annex 3. Implications and recommendations for the WB6

Promoting circular plastic packaging

The shift from linear to circular plastic packaging sits at the core of the EU's plastics agenda and is increasingly a precondition for market access to the EU. For the WB6, and for the RCC

as a facilitator of regional integration, this is not just an environmental agenda, but it is also an industrial, trade and competitiveness question. The region exports packaged goods to the EU, imports most of its packaging formats and relies heavily on external demand for secondary raw materials. Unless packaging placed on the WB6 markets is designed for recyclability, reuse and meaningful recycled content, even the best waste-management reforms will struggle to deliver circular outcomes. This chapter therefore directly operationalises Action 22 of the Revised Action Plan for the Implementation of the GAWB 2025–2030, which commits the WB6 to phasing out the most polluting SUP and integrating circular solutions for plastic packaging by 2030.

The 2018 European Strategy for Plastics in a CE marked a turning point by explicitly linking plastics design, recyclability and market development for secondary plastics. It set the expectation that all plastic packaging placed on the EU market should be reusable or recyclable in a cost-effective manner by 2030 and called for higher recycling rates and separate collection performance [82]. The subsequent revision of EU waste legislation and the SUP Directive added specific requirements for certain product groups, including mandatory recycled content in PET beverage bottles and collection targets for those bottles [83]. Most recently, the new Packaging and Packaging Waste Regulation (PPWR) has been adopted, making these aspirations legally binding by requiring that all packaging be recyclable by 2030 and setting detailed, material-specific recycled content targets for plastic packaging for 2030 and 2040 [84].

Around 80% of a product's environmental impact is determined in the design phase. Design choices define whether packaging can be sorted and recycled in existing infrastructure, whether additives or colorants will downgrade recyclate quality and whether labels, adhesives and closures will interfere with processing [82]. In the EU context, a growing body of evidence shows that countries which combine ambitious design requirements with well-structured EPR schemes and high-performing collection systems achieve significantly higher recycling rates and more stable secondary markets [85].

Design and recycled content as levers for circularity

Promoting circular plastic packaging in the WB6 means first changing what is placed on the market. In many WB6, the packaging mix still includes a high share of multi-layer films, coloured PET, complex laminates and hard-to-recycle formats imported from multiple sources. Local recycling capacity is limited and tends to focus on clean, mono-material fractions, typically clear PET, HDPE or certain polyolefin films. This mismatch between packaging design and available treatment options creates structural leakage in the system. Even where separate collection exists, a substantial proportion of plastic packaging is either downcycled into low-value products or exported as mixed bales with uncertain fate. Closing this design infrastructure gap is essential for meeting the Action 22 milestones, including the progressive phase-out of the top five most littered SUP items and the shift towards packaging that is demonstrably recyclable, reusable or compostable by 2030.

EU policy responses increasingly target this design and infrastructure interface. The European Strategy for Plastics announced the goal that, by 2030, more than half of plastic waste generated

in Europe would be recycled, supported by higher separate collection rates and design improvements for all key applications [82]. The PPWR now operationalises this by requiring that packaging be recyclable at scale, meaning that it must be compatible with collection, sorting and recycling systems that are technically and economically viable in the EU. It also sets binding recycled content targets for different categories of plastic packaging. SUP beverage bottles must contain at least 30% post-consumer recycled content by 2030, with higher thresholds foreseen for 2040 [86].

Major beverage producers and retailers in several EU Member States have moved rapidly to incorporate recycled PET (rPET) into their bottles, supported by the SUP Directive's interim target of 25% recycled plastic in PET bottles by 2025 [83]. This has stimulated investment in high-quality PET recycling plants and in DRS that can supply food-grade rPET. The implication for the WB6 is clear, i.e. to remain integrated with EU value chains, WB6 producers and importers will increasingly have to meet not only EU-style waste management obligations but also design and recycled content expectations.

Lessons from European EPR and design-for-recycling frameworks

EPR is a critical transmission mechanism between policy goals and packaging design. When EPR schemes incorporate eco-modulated fees, e.g. higher fees for hard-to-recycle formats, lower fees for recyclable, high-recycled-content packaging, they create a direct economic signal in favour of circular design.

Comparative studies of packaging EPR schemes in Europe show that EU member states with well-designed, transparent and strictly enforced EPR systems achieve higher recycling rates and greater use of recycled materials, while those with weak enforcement and limited fee differentiation struggle to move beyond "end-of-pipe" solutions [85]. Germany was one of the first to introduce EPR for packaging in the 1990s, and its system has undergone several reforms. The 2019 Packaging Act (VerpackG) replaced earlier legislation, introduced a mandatory registration of all obligated producers with a Central Packaging Register, and tightened controls against free riders who had previously escaped their obligations. The German Act also strengthened the basis for eco-modulated fees and made recyclability a key consideration in packaging design, in line with the EU plastics strategy. As a result, packaging producers have increasingly shifted towards mono-material formats, lighter weights and clearer labelling to facilitate sorting. In parallel, separate collection systems (the yellow bin and yellow bag) and a strong recycling industry have matured into a relatively stable circular market for several plastic streams [87].

Beyond domestic legislation, voluntary industry initiatives have provided pragmatic design tools that can be adopted by regulators and businesses alike. The CEFLEX[1] Designing for a Circular Economy (D4ACE) guidelines, developed by a consortium of over 180 companies and organisations, offer detailed criteria for making flexible plastic packaging recyclable, including recommendations on material choices, barrier layers, inks and adhesives. These

[1] The Circular Economy for Flexible Packaging (CEFLEX) initiative is a collaboration of over 180 European companies, associations and organisations representing the entire value chain of flexible packaging

guidelines are increasingly used by brand owners and converters when redesigning packaging portfolios and are compatible with emerging PPWR requirements [88].

For the WB6, where EPR schemes are being introduced or reformed, these experiences underline two points. First, EPR must be more than a fee collection mechanism, and it needs to integrate design for recycling principles and incentivise recycled content. Second, WB6 regulators and PROs do not need to start from scratch on technical specifications as they can explicitly reference and adapt existing EU design guidelines, ensuring that packaging placed on the regional market is compatible with both local infrastructure and EU standards.

Aligning circular packaging with high-performing collection systems

European experience demonstrates the impact of well-designed DRS on circular packaging. In Germany, the mandatory deposit system for one-way beverage containers achieves return rates exceeding 98%, providing high-quality PET and other materials to recyclers and underpinning the use of recycled content in bottles. Lithuania offers another instructive case for smaller markets. Before introducing a jurisdiction wide DRS in 2016, its collection rate for beverage containers was below 34%. Two years later, the return rate had risen to over 90%, where it has broadly remained.

Research done by Picuno et al (2025) on DRS implementation throughout Europe validate that schemes integrating adequately high deposit values, accessible return-to-retail infrastructure and transparent public communication consistently surpass systems dependent exclusively on curb side collection. These case studies show how high-performing collection tools can directly support circular packaging goals for the WB6, where beverage bottles and cans are some of the most common plastic items in litter and municipal waste. The main point for WB6 is that circular packaging policy cannot be made in a vacuum. Requirements for recyclability and recycled content should be in line with the introduction of EPR, DRS, and better separate collection infrastructure. This will allow producers to make plans for how to comply with the rules and recyclers to invest in capacity with a steady supply of materials.

European standards and voluntary initiatives supporting circular packaging

In 2022, the European Commission issued a standardisation request to CEN and CENELEC on plastics recycling and recycled plastics, aiming to develop harmonised standards that support the plastics strategy and the transition to a CE. These standards cover, among other aspects, the characterisation of recycled plastics, quality requirements for recyclates and methodologies to assess recyclability [89].

Initiatives such as CEFLEX, mentioned above, and others focusing on rigid packaging, labels and closures, provide complementary, value chain driven solutions. CEFLEX's Mission Circular explicitly commits to the collection of all flexible packaging and to channelling at least 80% of recycled materials into new markets and applications that substitute virgin plastics. This sort of collective commitment is particularly relevant for regions like the WB6, where individual companies may lack the resources to develop proprietary design tools, but can benefit from open guidelines and intraregional cooperation.

In practical terms, WB6 do not need to align with the entire universe of European standards at once. A first priority should be to converge on three core groups of standards (i) design-for-recycling and recyclability standards that define which packaging formats are considered

recyclable at scale in EU-compatible systems; (ii) quality and traceability standards for recycled plastics, which underpin safe and stable use of recyclate in new products; and (iii) chemical safety and food-contact standards for plastics, including limits on hazardous substances, endocrine-disrupting chemicals and legacy additives in both virgin and recycled polymers. Focusing on these three clusters provides a realistic and high-impact starting point for WB6, ensuring that plastic packaging is not only technically recyclable, but also chemically safe and acceptable for use in food and other sensitive applications.

Implications and recommendations for the WB6

Translating these EU experiences into the WB6 context requires a pragmatic, sequenced approach. WB6 are at different stages of EPR and SUP transposition, recycling infrastructure is inadequate and institutional capacity is constrained. At the same time, the region's integration into EU value chains and the CRM make alignment with the circular packaging agenda both necessary and potentially advantageous. The recommendations below are therefore framed as a sequenced roadmap for implementing Action 22 at regional level, in close coordination with related measures on EPR harmonisation (Action 19) and waste management infrastructure (Action 20) under the revised GAWB.

Develop and adopt regional design for recycling guidance for plastic packaging

This guidance should be aligned with EU standards but tailored to the capabilities of WB6 collection and recycling systems. This guidance should define, for the main packaging types used in the region, which formats are considered recyclable at scale, which are transitional and which should be phased out. Technical content can draw heavily on established European sources, such as the CEFLEX D4ACE guidelines for flexible packaging and forthcoming CEN/CENELEC standards on plastics recycling and recyclates. Once adopted, such a WB6 circular packaging design manual would provide the common technical reference needed to demonstrate, by 2029, that at least half of plastic packaging placed on WB6 markets is recyclable, reusable or compostable, as envisaged in the Action 22, while underpinning the phase-out of the most problematic SUP formats.

A relevant example comes from EU Member States where industry-developed guidelines have been formally recognised or referenced by regulators and PROs. By integrating CEFLEX criteria into fee modulation schemes and recyclability assessments, several WB6 have steered converters away from complex laminates towards mono-material PE and PP films that can be sorted and recycled more easily. In the WB6, RCC could facilitate a joint expert group to adapt such guidelines into a WB6 circular packaging design manual to be used by authorities, PROs and producers as a shared technical basis.

Introduce phased recycled-content and recyclability requirements for priority packaging categories

This refers to the introduction of phased recycled-content and recyclability requirements for priority packaging categories. In practice, this should begin with PET beverage bottles and, where appropriate, extend to a limited set of food-contact packaging formats that can safely

incorporate certified food-grade recycled plastics in line with EU food-safety legislation. The SUP Directive and PPWR already provide reference targets for recycled content in PET bottles and other categories of plastic packaging, underpinned by rapidly expanding rPET capacity in Europe.

Lithuania's experience shows that rapid improvements in container return rates through DRS can, within a few years, provide stable rPET supply that supports higher recycled-content shares. A similar trajectory could be envisaged for selected WB6 markets that introduce DRS and coordinate with EU recyclers.

For the WB6, immediate replication of EU-level targets may not be realistic, given the current scarcity of locally available food grade recyclate. However, WB6 can set indicative milestones, e.g. a minimum recycled content in PET bottles for products exported to the EU, or voluntary commitments for large retailers and beverage producers, while simultaneously investing in collection and recycling. These phased requirements should be explicitly framed as interim milestones towards the Action 22 objective of integrating circular solutions for plastic packaging, including the 2030 target of achieving at least 30% recycled plastic content in plastic packaging and ensuring that all plastic packaging placed on the market can be safely and effectively circulated in practice.

Integration of circular packaging objectives into EPR fee modulation and spending priorities

As EU guidance increasingly requires that a portion of EPR and DRS revenues be allocated to prevention, reuse and recyclability improvements, EU Member States such as Germany are adjusting their packaging laws to ensure that economic signals favour circular formats [90]. Rather than setting flat fees per kilogram of packaging placed on the market, PROs in the WB6 should differentiate fees based on recyclability, recycled content and, where appropriate, reuse potential. Higher fees for non-recyclable multi-material packaging and lower fees for easily recyclable mono-material formats would gradually shift the packaging portfolio without requiring immediate bans. A portion of EPR revenues should be earmarked for investments in sorting upgrades, design support for SMEs and pilot projects on circular packaging. Germany's use of a Central Packaging Register to enforce producer registration and monitor compliance illustrates how improved governance can underpin such modulation and ensure that all obligated producers contribute fairly.

To ensure that circular packaging does not compromise health and environmental protection, WB6 should progressively align with EU rules on hazardous substances in packaging and recycled plastics, with a focus on food-contact legislation, restrictions on substances of very high concern and limits on persistent organic pollutants in plastic waste. This requires clarifying in domestic legislation which chemical-safety requirements apply to plastic packaging and recyclates, integrating chemical-compliance obligations into EPR and DRS frameworks, including clear responsibilities for producers and PROs and reinforcing inspection and laboratory capacities in close cooperation between environment, health and food-safety authorities. At regional level, RCC could facilitate a shared checklist of priority chemical

standards for WB6 and promote joint training and round-robin testing to improve oversight and reduce compliance costs for businesses operating across several WB6.

By linking fee modulation parameters and spending priorities directly to the quantitative indicators set out in Action 22, notably on the availability of the top five SUP items, recyclability of plastic packaging and recycled-content levels, WB6 can ensure that EPR and DRS revenues are systematically channelled into measures that deliver verifiable progress towards the 2030 targets.

Link circular packaging design with public procurement and regional investment planning

Public buyers can create predictable demand for circular packaging by embedding recyclability, recycled-content and SUP-free requirements directly into tenders. The Regional Green Public Procurement criteria for the WB6 already include explicit provisions to avoid and, in some catering services, ban SUP products in line with SUP Directive, providing a readymade operational reference for contracting authorities. RCC should promote systematic uptake of these regional GPP criteria, develop model clauses that extend them to priority plastic packaging formats, and link such clauses to regional investment planning under the revised GAWB.

In practical terms, contracting authorities could be required, by 2028 at the latest, to eliminate the top five most littered SUP items from framework contracts for catering and events, and to give preference to packaging that complies with agreed regional recyclability and recycled-content thresholds, thereby turning GAWB Action 22 commitments into concrete purchasing decisions.

Embed circular packaging considerations into regional cooperation

Packaging producers and importers often operate across several WB6 markets. Divergent design rules and recycled-content requirements across the six markets would fragment the regional market and increase compliance costs. Aligning core requirements, such as definitions of recyclability, lists of problematic additives and indicative recycled-content milestones, would reduce transaction costs and strengthen the region's position with EU trading partners.

European experience shows that where rules are clear, harmonised and enforced, the packaging value chain responds with innovation and investment. The WB6 can leverage that experience by consciously promoting circular plastic packaging as a strategic pillar of its waste management reforms, rather than an afterthought. RCC, as coordinator of the GAWB, is well placed to anchor these requirements in a dedicated regional platform on circular plastic packaging that tracks indicators, facilitates peer learning on SUP phase-out and circular packaging solutions, and provides early warning where individual WB6 risk falling behind the agreed milestones.

Annex 4. Monitoring indicators

This Annex translates the analytical work and recommendations into an operational MRV framework for SUP phase-out and circular plastic packaging in the WB6. It proposes a concise set of regional key performance indicators and explains how data will be collected, validated and reported through existing and planned systems, including the RCC Green Agenda Observatory and GARI. The framework is designed primarily for RCC, GAWB focal points at WB6 level, environment ministries, environmental protection agencies, statistical offices, and PROs and future DRS operators. It provides a common reference for aligning domestic monitoring efforts with the Revised GAWB Action Plan (2025–2030), avoiding duplication and ensuring that progress can be tracked consistently across WB6. In this sense, it serves as a practical MRV blueprint rather than a purely narrative description.

Key performance indicators

The KPIs are fully aligned with the Revised GAWB Action Plan (2025–2030), with Actions 19 (Harmonise and operationalise EPR schemes for key waste streams across the WB6 by 2030) and especially with Action 22 (By 2030, WB6 will strive to phase out SUP and integrate circular solutions for plastic packaging across WB6). Action 22 provides time-bound milestones and a pre-defined indicator logic (including means of verification) that this framework adopts. In particular, the KPI targets reflect the Action 22 milestones for:

- adoption of plastic pollution strategies by 2028,
- bans/restrictions for the top 5 most littered SUPs in at least 3 WB6 by 2028,
- functional EPR systems for plastic packaging in all WB6 by 2028,
- an 80% reduction in the availability of the top 5 SUPs in the market by 2028 (compared to a 2023 baseline),
- at least 50% of plastic packaging being recyclable/reusable/compostable by 2029, and
- 30% recycled plastic content in plastic packaging by 2030 in line with EU targets.

To ensure that the same parameters are measured across WB6, the KPI set uses a harmonised definition of priority SUP groups consistent with the project's phase-out focus. The top five most priority SUP groups for monitoring are lightweight carrier bags, beverage containers, cups for beverages, food containers and cutlery (including stirrers). As some WB6 have different data maturity levels, each KPI is structured so that minimum reporting is feasible in all WB6 using official legal texts, administrative registers, PRO reports and agreed monitoring methodologies (as foreseen under Action 22 means of verification, including the RCC GAWB Observatory Platform and GARI).

The regional baseline year for market availability reduction is 2023, as specified in Action 22. For all other indicators, the baseline is defined as the first year with validated, comparable WB6 data (expected to be 2025 or 2026 depending on the indicator), after which annual reporting should follow. Regional results should be reported as WB6 totals for count-based indicators and population weighted or volume weighted aggregates for rate-based indicators where appropriate, with transparent metadata on methods and coverage.

Table 7. KPI for SUP phase-out in the WB6

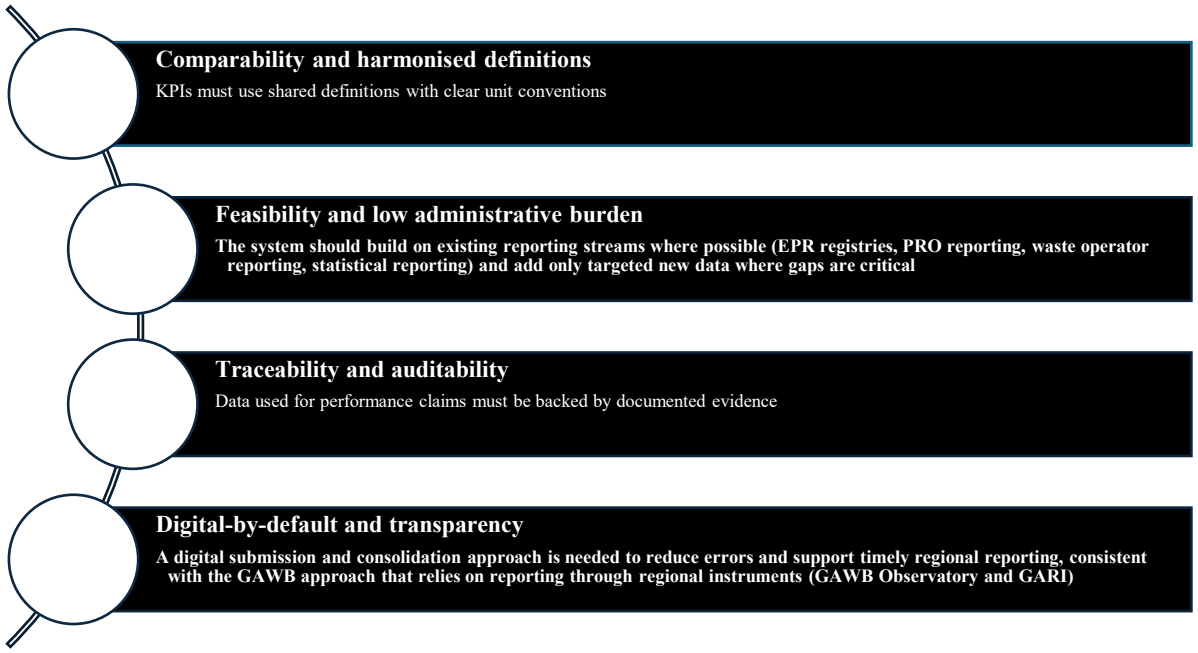
#	KPI	Unit	Target	Source of verification	Responsible body	Related recommendation / action in the report
1	Plastic pollution reduction strategy adopted (aligned with EU Plastics Strategy)	Number of plastic pollution reduction strategies adopted	6/6 strategies adopted by 2028	Official strategy documents Official gazette/legal register	WB6 competent authorities RCC (GAWB Observatory / GARI)	Establish a coordinated regional framework for SUP phase-out and circular plastic packaging (Section 5.2.1.1) and the WB6 specific actions to adopt or update plastics/SUP strategies (Section 5.2.2.2)
2	Transposition and implementation of key anti-plastic pollution measures (from the regional Joint Statement operationalisation)	WB6 count implementing agreed measures	6/6 fully implement agreed measures by 2028	Official gazette / legal register implementation reports	WB6 competent authorities RCC (GAWB Observatory / GARI)	SUP phase-out, EPR harmonisation and DRS development (Section 5.2.1.1) and WB6 specific measures to transpose and enforce SUP and plastics legislation (Section 5.2.2.2)
3	Top 5 SUP groups banned or significantly restricted	WB6 count with bans/restrictions covering the 5 priority groups	≥3 WB6 by 2028 6/6 by 2030	Official gazette/legal register	WB6 competent authorities Market inspectorate RCC	High-priority SUP items for phase-out (Section 5.1) and establishing a coordinated regional framework for bans/restrictions on the top five SUP groups (Section 5.2.1.1), complemented by WB6 specific SUP measures (Section 5.2.2.2)
4	Reduction in market availability of the top 5 SUP groups (compared to 2023 baseline)	% reduction vs 2023 Using items/tonnes placed on market per category (per capita where possible)	80% reduction by 2028 Sustain/improve by 2030	Packaging/SUP producer registries PRO reports, customs/import data Market surveillance summaries	WB6 competent authorities PROs statistical offices RCC	Phasing out high-priority SUPs through bans, economic instruments, GPP and reuse/refill schemes (Sections 5.1, 5.2.1.1 and 5.4), as well as WB6 specific market-restriction and enforcement actions (Section 5.2.2.2)
5	Functional EPR for plastic packaging in place	Yes/No per WB6, WB6 count Minimum functionality criteria (registration,	6/6 by 2028	PRO registration/audit reports Annual EPR performance reports	WB6 competent authorities PROs RCC	Strengthen and harmonise EPR implementation across the region (Section 5.2.1.1), thematic measures on EPR/DRS as the financial

#	KPI	Unit	Target	Source of verification	Responsible body	Related recommendation / action in the report
		fee collection, audited reporting, financing of collection/sorting)		Official gazette/legal register		backbone of circular packaging (Section 5.3.4) and WB6 specific EPR reforms (Section 5.2.2.2)
6	EPR performance (packaging waste recycled)	% of packaging waste recycled (EPR-managed stream)	≥50% by 2030	WB6 level waste statistics PRO performance reports	WB6 statistical offices WB6 competent authorities PROs RCC	Improving EPR performance and transparency (Sections 5.2.1.1 and 5.3.4), including fee modulation and spending priorities, and WB6 specific actions to raise recycling targets and strengthen monitoring (Section 5.2.2.2)
7	EPR coverage milestone (regional)	WB6 count with operational packaging EPR	6/6 with packaging EPR by 2028	Official gazette/legal register PRO operating licences Compliance scheme records	WB6 competent authorities RCC	Harmonise core EPR requirements and expand coverage to all obligated producers (Section 5.2.1.1), and domestic roadmaps for operationalising EPR for packaging (Section 5.2.2.2)
8	Plastic packaging circularity: share recyclable/reusable/compostable	% of plastic packaging placed on market meeting agreed criteria	≥50% by 2029	Packaging registries and design declarations PRO datasets Conformity criteria adopted regionally	WB6 competent authorities PROs RCC	Introduce regional standards for recyclability, recycled content and reuse systems (Section 5.2.1.1) and thematic measures on a WB6 circular packaging design manual and design-for-recycling guidance (Section 5.3.4)
9	Plastic packaging circularity: 100% reusable/recyclable/compostable	% of plastic packaging placed on market meeting agreed criteria	100% by 2030 (Action 22 narrative target)	Packaging registry Market surveillance Independent audits (where available)	WB6 competent authorities RCC	Aligning WB6 packaging design rules with the EU PPWR and developing a regional circular-packaging framework (Sections 5.2.1.1 and 5.3.4)
10	Recycled content in plastic packaging (focus: beverage bottles)	% of recycled plastic content in plastic beverage bottles (weighted average)	30% by 2030	Producer declarations Certification/audit reports PRO datasets	WB6 competent authorities PROs, large producers/retailers RCC	Phased recycled-content requirements for priority packaging categories, especially PET beverage bottles (Section 5.3.4), and DRS-related measures that secure high-quality

#	KPI	Unit	Target	Source of verification	Responsible body	Related recommendation / action in the report
						rPET feedstock (Sections 5.2.1.1 and 5.2.2.2)
11	Marine/coastal litter density (plastic)	Annual quantity kg/km² on selected monitoring sites	Report progress towards Action 22 outcomes	Marine litter monitoring using harmonised methodologies	WB6 competent authorities Designated monitoring institutions RCC	SUP phase-out in tourism and coastal hotspots (Sections 5.1 and 5.2.2.2), regional DRS and EPR strengthening (Section 5.2.1.1), and coordinated awareness and clean-up actions targeting marine litter (Section 5.2.1.1)
12	Reduction of commonly found SUPs in coastal litter	% reduction of priority SUP items in coastal litter	Track trend, recommended milestone alignment with market-availability reduction	Harmonised litter monitoring datasets Independent evaluation (where available)	WB6 environment agencies + monitoring institutions → RCC	Banning/restricting the most commonly littered SUP items (Section 5.1), embedding SUP-free requirements in events and tourism procurement (Sections 5.3.4 and 5.4), and strengthening enforcement in coastal municipalities (Section 5.2.2.2)
13	Regional reuse/refill pilots launched	Number of pilots launched	Milestones to be set regionally. Action 22 requires tracking the number launched	Pilot project documentation PRO reports Municipal procurement records	WB6 competent authorities Municipalities PROs RCC	Blueprint for a regional approach to reuse and refill and related pilots in HoReCa, retail and events (Section 5.4), supported by circular-packaging recommendations and WB6 specific reuse actions (Sections 5.3.4 and 5.2.2.2)
14	Public awareness of circular economy	% of population reporting awareness (survey-based)	>60% by 2030	Balkan Barometer / RCC Campaign reports RCC GARI	RCC/GARI	Coordinate awareness and behaviour-change campaigns targeting key SUP items and circular packaging (Section 5.2.1.1) and communication and education measures embedded in WB6 specific roadmaps (Section 5.2.2.2)

Data collection and reporting mechanisms

This KPI framework is only as credible as the underlying MRV system that feeds it. Across the WB6, one of the recurring barriers to effective plastics policy is not only weak enforcement, but also unreliable, incomplete and non-comparable data. In line with the terms of reference, the data collection system is therefore designed around practical, harmonised data collection, processing, validation and interpretation steps that can be implemented by WB6 institutions with support from the RCC Secretariat. The proposed MRV system should apply a common set of principles across all WB6 to ensure that KPIs are comparable and useful for regional coordination.



The ToR foresees close consultation and structured coordination with the RCC Secretariat, including regular communication to resolve open issues and guide delivery. Building on this, the MRV set-up should include the relevant bodies.

Proposed MRV workflow for KPI data collection and reporting (WB6)

To ensure consistent, comparable and implementable MRV across the WB6, the following harmonised cycle is proposed.

Step 1 – Data provision (continuous / quarterly)

Primary data are generated by designated data providers at WB6 level, including:

- PROs
- DRS operators (where applicable)
- Licensed waste operators and recyclers
- Customs and statistical authorities (for production and imports)

Data are collected using harmonised templates and definitions agreed at regional level.

Step 2 – Domestic compilation and validation (quarterly)

Each WB6 designates a **Domestic MRV Focal Point** (e.g. ministry or agency) responsible for:

- Compiling data from all domestic providers
- Conducting basic completeness and consistency checks
- Requesting clarifications or corrections where needed
- Approving datasets for regional submission

Step 3 – RCC plausibility checks and consolidation (quarterly / semi-annual)

The RCC Secretariat receives validated domestic datasets and performs:

- Cross-WB6 plausibility and consistency checks
- Trend analysis and identification of outliers
- Follow-up with domestic focal points on data gaps or anomalies

Step 4 – Dashboard update and publication (semi-annual)

Based on consolidated data, RCC updates a **regional KPI dashboard**, presenting:

- Core SUP and plastic packaging indicators
- WB6 level and regional trends
- Progress against agreed targets and benchmarks

The dashboard serves as a transparency and coordination tool for institutions and stakeholders.

Step 5 – Regional reporting and review (annual)

A **regional MRV report** is prepared by RCC, summarising:

- KPI performance and trends
- Key implementation gaps and risks
- Policy-relevant insights for regional and WB6 level decision-making

Findings are discussed with WB6 institutions to inform roadmap updates and policy adjustments.

Table 8. Bodies in the MRV system and their role

Body	Description
Focal Points (one per WB6)	Each WB6 designates a competent institution (typically the ministry or agency responsible for environment) as the MRV Focal Point for SUP and plastic packaging. The focal point is responsible for: • coordinating WB6 level data providers • ensuring definitions align with the regional KPI metadata • submitting validated datasets to RCC in agreed timelines and • providing short narrative explanations for major year-on-year changes that may include policy changes, new infrastructure, changed reporting coverage, etc.
Primary data providers (WB6 level)	To produce the KPI set, data must be sourced from institutions that are closest to real flow and compliance evidence, including: • PROs for packaging EPR (placed-on-market volumes, separately collected packaging, recycling evidence, fees, free-rider controls) • DRS operators (where in place or piloted) for beverage containers • municipalities and public utilities / waste operators • treatment operators / MRFs / recyclers / exporters

Body	Description
	• inspectorates / enforcement bodies • customs / tax authorities where relevant As EPR/DRS reforms in the WB6 are expected to move to functioning systems, transparent monitoring and reporting is explicitly part of operationalisation. The MRV system should therefore treat PRO/DRS datasets as core evidence streams, while ensuring oversight and checks.
RCC Secretariat	RCC acts as regional aggregator and convenor for the MRV process, consistent with objective to support regionally coordinated implementation pathways and indicator monitoring. RCC's role in MRV should include: • maintaining the regional KPI metadata catalogue (definitions, formulas, source hierarchy) • hosting the annual reporting calendar and submission templates • running basic consistency and plausibility checks across WB6 • producing an annual regional monitoring snapshot and an analytical regional progress report with WB6 profiles and cross-cutting findings • coordinating technical troubleshooting and targeted capacity support
Independent verification	Independent verification bodies provide assurance on the accuracy, completeness and credibility of reported data. Depending on domestic arrangements, these may include: • certified external auditors verifying PRO and DRS financial and material flow reports • domestic audit or inspection bodies conducting compliance and performance checks • accredited laboratories verifying recycled content claims or material quality where required

To avoid over-reliance on a single reporting channel, which is a common weakness where data quality is uneven, KPIs should be supplied through a structured set of complementary data streams.

A. Placed on the market and compliance data

(Primary source: PROs, producers, customs/tax authorities)

Minimum dataset fields should include:

- material type and packaging format (e.g. PET bottle, multilayer film, carrier bag);
- weight (kg) and units placed on the market;
- producer/importer identifier and EPR registration status;
- reporting period and market scope (domestic production vs imports);
- applicable EPR fee category or modulation class (where relevant).

B. Waste management performance data (municipal + operator reporting)

(Primary source: municipalities, waste operators, MRFs, recyclers, exporters)

Minimum dataset fields should include:

- collection coverage (population or area served);
- separately collected plastic packaging tonnages by material type;
- sorting outputs and reject rates at MRF level;
- final treatment route (recycling, export, disposal);
- reporting period and facility/operator identifier.

C. Litter / leakage monitoring

(Primary source: municipalities, inspectorates, NGOs, survey contractors)

Minimum dataset fields should include:

- site metadata (location, type, urban/rural, water/land-based);
- monitoring method used (e.g. visual count, transect survey, weight-based);
- priority SUP item categories recorded;
- sampling frequency and survey date;
- responsible organisation and quality assurance method.

D. Awareness and behaviour data

(Primary source: surveys, campaign monitoring, reuse system operators)

Minimum dataset fields should include:

- survey or data collection method and sample size;
- target group (households, businesses, tourists, students);
- key behavioural indicators (e.g. awareness of bans, return behaviour, reuse participation);
- geographic coverage and timing;
- link to specific policy measures or awareness campaigns (where applicable).

Reporting tools and regional platforms

To ensure full alignment with the Revised GAWB Action Plan (2025–2030), regional reporting should be structured so that plastics-related KPIs can be integrated into the region's established monitoring channels. The Action Plan's logic anticipates regional waste statistics and related evidence being reported via the GAWB Observatory and GARI. For EPR-related monitoring specifically, the Action Plan also points to annual EPR performance reporting and reporting via the same regional channels. Practically, this means the MRV system should use:

- Standard RCC submission templates with built-in validation
- A regional KPI dashboard layer that can export a GAWB Observatory ready dataset
- GARI-compatible reporting packages, consisting of (i) the dataset, (ii) a short methodological note, and (iii) a narrative progress summary per WB6

Quality assurance, verification and dispute resolution

Given the well-documented challenge of unreliable data and weak traceability in plastics flows, the MRV system should include explicit quality assurance/quality control (QA/QC) steps, including:

- Each KPI value is tagged as Tier 1, 2 or 3. This makes limitations transparent without blocking reporting.
- Key values (e.g. packaging placed on market vs. packaging waste generated, recycling claims vs. recycler intake evidence) should be cross-checked where feasible.
- Where PROs/DRS operators provide performance data, competent authorities should require routine audits and publish summary audit findings (at least on data integrity and methodology). This aligns with the need for transparent monitoring and reporting systems as EPR/DRS are operationalised.

- If RCC's plausibility checks flag anomalies, the Domestic Focal Point coordinates a correction window (e.g. 2–4 weeks). Unresolved issues are documented transparently in the regional report (with explanation and next steps).

Table 9. Tier 1, 2 and 3 definitions

	Qualification criteria	Example
Tier 1 - Verified primary data **Data that are directly measured, traceable, and independently verified.**	- sourced from operational systems (e.g. PROs, DRS operators, licensed facilities); - subject to independent audit or formal verification; - based on harmonised definitions and reporting templates.	Audited PRO data on plastic packaging placed on the market and recycled, verified by a certified external auditor.
Tier 2 – Administrative or operational data without independent verification **Data that are reported through official administrative or operational channels but not subject to external audit.**	- sourced from competent authorities, municipalities or operators; - internally validated by domestic MRV focal points; - consistent with agreed definitions but lacking independent verification.	Municipal reports on separately collected plastic packaging tonnages without third-party audit.
Tier 3 – Estimates, proxies or modelled data **Data derived from indirect methods where primary data are incomplete or unavailable.**	- based on estimation methods, extrapolation or proxy indicators; - used as interim solutions to ensure continuity of reporting; - clearly documented assumptions and methodologies.	Estimated plastic litter quantities derived from periodic surveys or proxy indicators where systematic monitoring is not yet in place.

A simple stepwise protocol should govern how anomalies are handled to keep the MRV system defensible and predictable:

- RCC screens submitted data and, where inconsistencies or outliers are detected, formally notifies the Focal Point at WB6 level, explaining the anomaly and the underlying plausibility test applied.
- The Focal Point coordinates a response within 2-4 weeks, either confirming an error and resubmitting corrected data, or providing a documented methodological explanation.
- Where corrections are made, RCC updates the dataset and records the change log; where explanations are accepted, the data are retained but tagged with the appropriate tier and methodological note.
- If issues remain unresolved, the corresponding KPI values are published with a clear data caveat flag in the regional report, accompanied by a brief corrective action plan agreed between RCC and the concerned WB6.

To balance feasibility with usefulness, the recommended reporting frequency is as follows:

Annual reporting	Regional synthesis
Full KPI set reported once per year, validated at individual WB6 level before submission to RCC	RCC publishes an annual regional monitoring snapshot and a deeper analytical progress report, feeding into GAWB reporting cycles through GAWB Observatory/GARI pathways

Capacity support and continuous improvement

The MRV system should be treated as a learning system that improves over the 2025–2030 period. The ToR explicitly expects structured data work (collection, processing, validation, interpretation) supported by stakeholder engagement. In practice, this implies:

- short technical guidance notes from RCC (definitions, templates, evidence requirements),
- periodic training sessions for focal points and key data providers, especially PROs/DRS operators and waste agencies, and
- gradual upgrades in data granularity.

The MRV system will operate as a learning and improvement mechanism over the 2025–2030 period. To operationalise this approach, the following structured capacity-support actions are proposed.

(i) Annual training for domestic MRV focal points

Actor: RCC Secretariat (with targeted external technical support as needed)

- Organise one annual regional training session for WB6 MRV focal points.
- Focus on KPI definitions, reporting templates, validation checks, and interpretation of results.
- Include dedicated modules for PROs, DRS operators, and key waste authorities where relevant.
- Use training outcomes to identify common data challenges and capacity gaps.

(ii) Technical guidance notes and reference materials

Actor: RCC Secretariat

- Develop and update short technical guidance notes covering KPI definitions, formulas, data sources, and evidence requirements.
- Provide standardised templates for data submission and narrative explanations.
- Issue clarifications or updates where methodological changes or new indicators are introduced.

(iii) MRV helpdesk and reporting clinics

Actor: RCC Secretariat (or delegated technical support unit)

- Operate a light-touch MRV helpdesk during reporting windows to respond to technical questions.
- Organise short virtual “clinic sessions” to resolve recurring issues (e.g. EPR data gaps, DRS reporting inconsistencies).
- Document recurring questions to inform future guidance updates.

(iv) Annual data maturity review and improvement planning

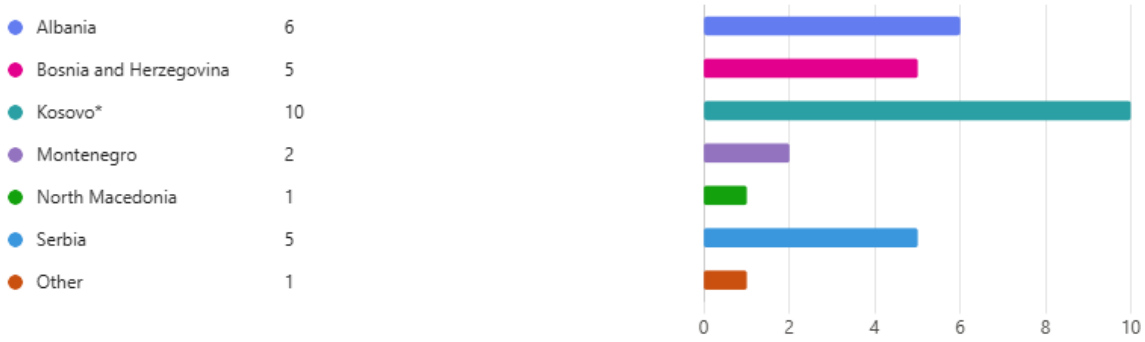
Actor: RCC Secretariat in coordination with domestic focal points

- Conduct an annual qualitative review of data completeness, consistency, and reliability by WB6.
- Identify priority improvements for each WB6 (e.g. new data sources, improved granularity, better validation).

Use findings to tailor capacity support and inform the following year's MRV work plan.

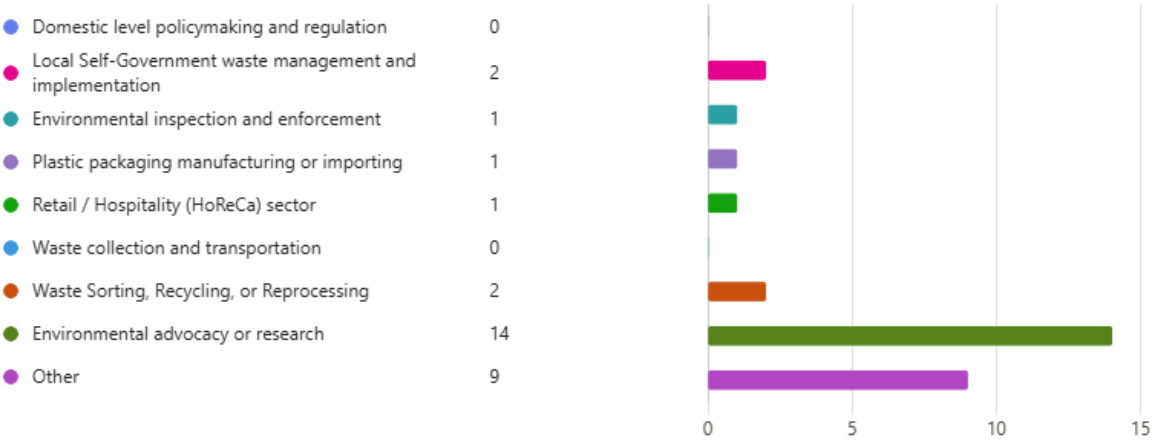
Annex 5. Questionnaire results

1. **Western Balkans Six**



2. **Sector**

3. **Primary area of activity**

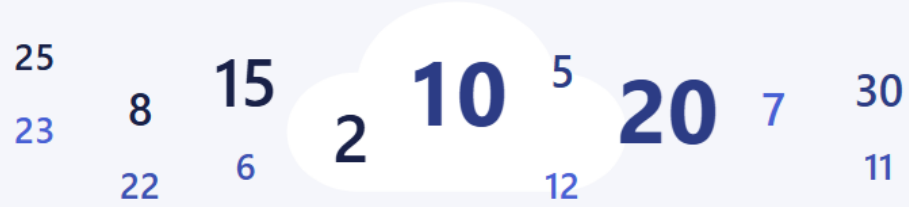


4. **How many years of professional experience do you have in your current field?**

30
Responses

Latest Responses
"15"
"12"
"5"
...

4 respondents (13%) answered 10 for this question.



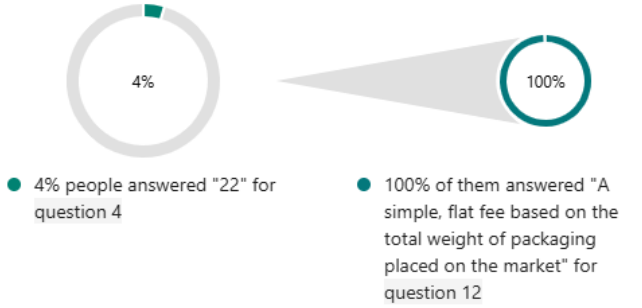
7% of people answered **3** for this question, and the majority answered "**Local / Municipal**" for Question 5.

- 7% people answered "3" for question 4
- 100% of them answered "Local / Municipal" for question 5

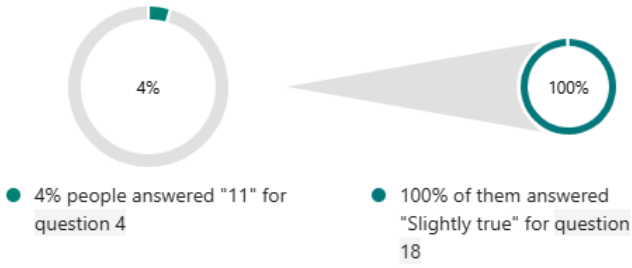
4% of people answered **23** for this question, and the majority answered "**Montenegro**" for Question 1.

- 4% people answered "23" for question 4
- 100% of them answered "Montenegro" for question 1

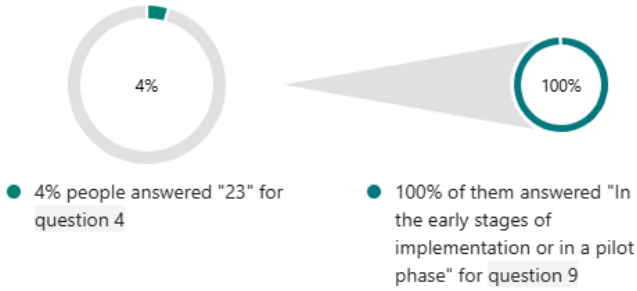
4% of people answered **22** for this question, and the majority answered "**A simple, flat fee based on the total weight of packaging placed on the market**" for Question 12.



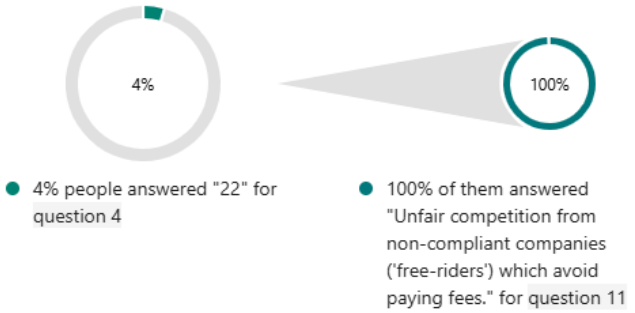
4% of people answered **11** for this question, and the majority answered "**Slightly true**" for Question 18.



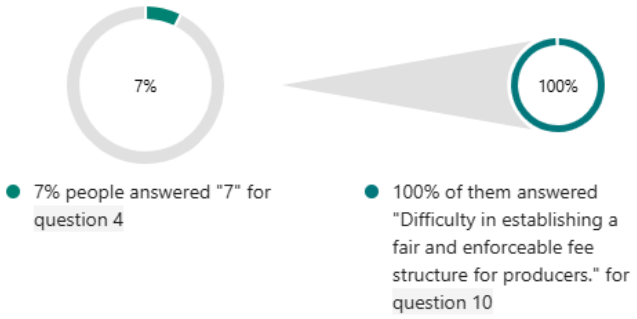
4% of people answered **23** for this question, and the majority answered "**In the early stages of implementation or in a pilot phase**" for Question 9.



4% of people answered **22** for this question, and the majority answered "**Unfair competition from non-compliant companies ('free-riders') which avoid paying fees.**" for Question 11.

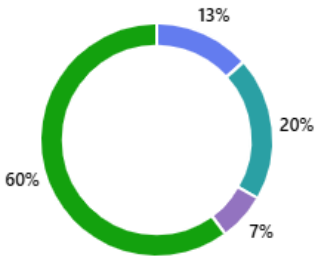


7% of people answered **7** for this question, and the majority answered "**Difficulty in establishing a fair and enforceable fee structure for producers.**" for Question 10.

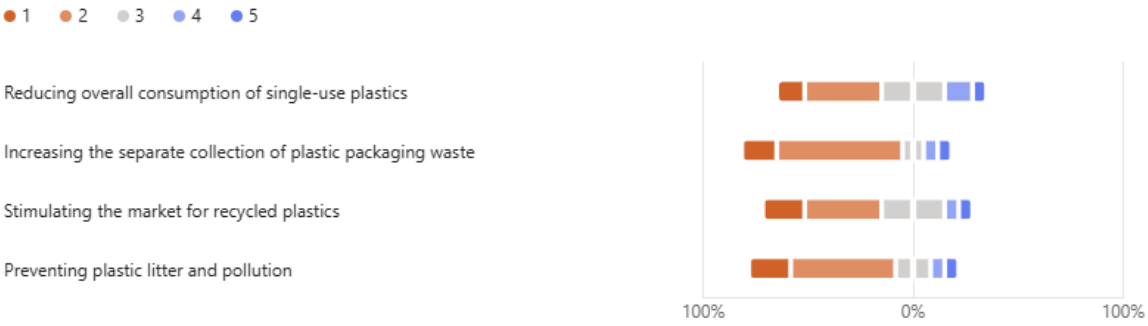


5. **What is the primary operational scope of your organisation?**

Local / Municipal	4
Regional (within the domestic level)	0
Domestic	6
International	2
Other	18

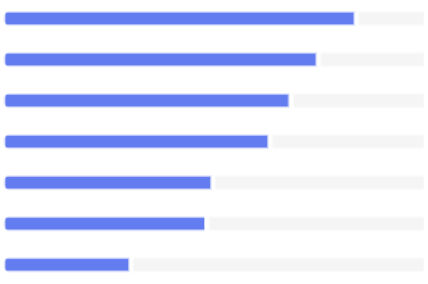


6. **On a scale of 1 (Not at all effective) to 5 (Highly effective), how would you rate the effectiveness of the current domestic legal and policy framework in achieving the following objectives?**



7. **From the list below, please rank by significance (highest first) barriers to the effective implementation of plastics-related legislation at domestic level.**

1	Low level of political will or priority
2	Insufficient financial resources for municipalities/agencies
3	Lack of administrative/technical capacity in enforcement bodies
4	Weak inspection and enforcement mechanisms (e.g. low fines, infrequent checks)
5	Unclear institutional responsibilities and poor inter-institutional coordination
6	Lack of public awareness and participation
7	Dominance of the informal waste sector



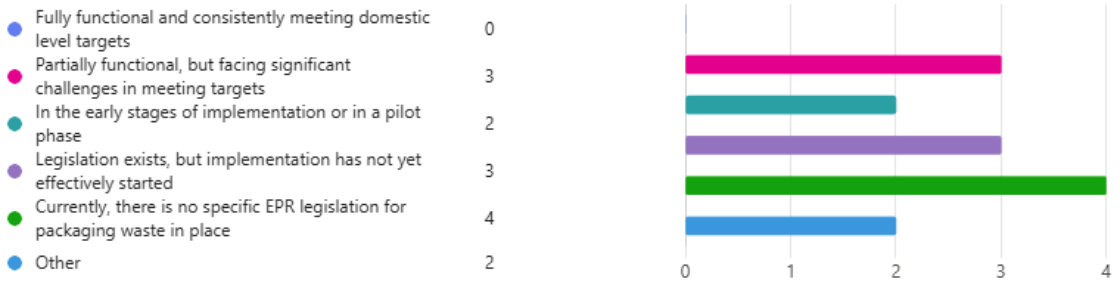
8. **In your professional view, what is the single greatest practical challenge domestically in fully aligning with the requirements of the EU Single-Use Plastics Directive (e.g. meeting the high separate collection targets for PET bottles, implementing product design requirements like tethered caps, or enforcing market restrictions on specific items)?**

30
Responses

Latest Responses
"N/A"
"She nead a more recycling in the county"
"The main challenge is ensuring effective separate collection systems and recycling ..."
...

9 respondents (30%) answered infrastructure for this question.

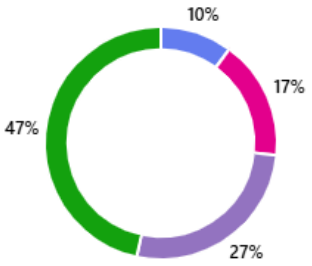
9. **Which of the following statements best describes the current status of the EPR system for packaging waste at domestic level?**



11. **If Private Sector was selected, what do you consider the primary obstacle preventing the establishment or full functionality of the EPR system for packaging at domestic level?**

12. **To make an EPR system for packaging more effective, which principle for setting producer fees do you believe would be most impactful in driving positive change?**

A simple, flat fee based on the total weight of packaging placed on the market	3
Fees differentiated by material type	5
Fees that are "eco-modulated" based on recyclability (e.g. lower fees for easily recyclable, mono-material...	0
A system that combines fees with a deposit-refund mechanism for certain packaging types	8
Other	14

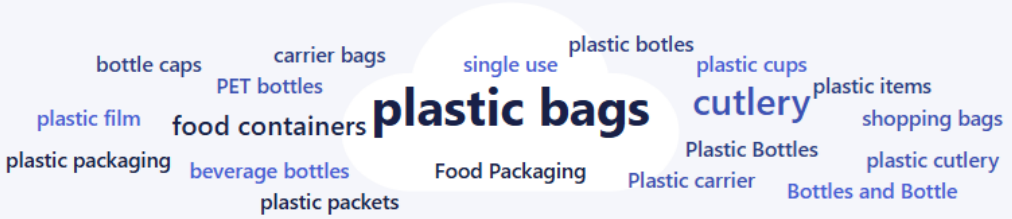


13. **Name the top three single use plastic items at the domestic level. If possible, please provide rationale and potential sou rces of information.**

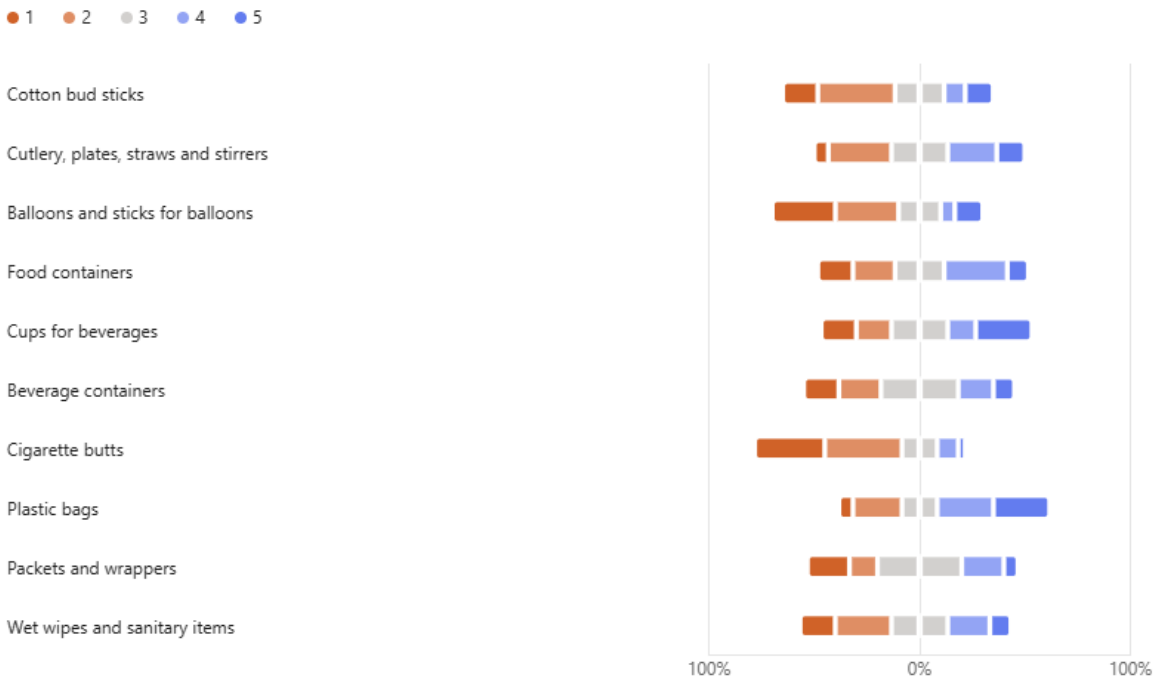
30
Responses

Latest Responses
"Ise for grocery in households"
"No respost"
"Plastic bags, PET bottles, disposable food packaging"
...

9 respondents (30%) answered plastic bags for this question.



14. **Please rate the current market readiness and economic viability of readily available alternatives to the following s ingle-use plastic items on a scale of 1 (Very Low Viability) to 5 (Very High Viability).**



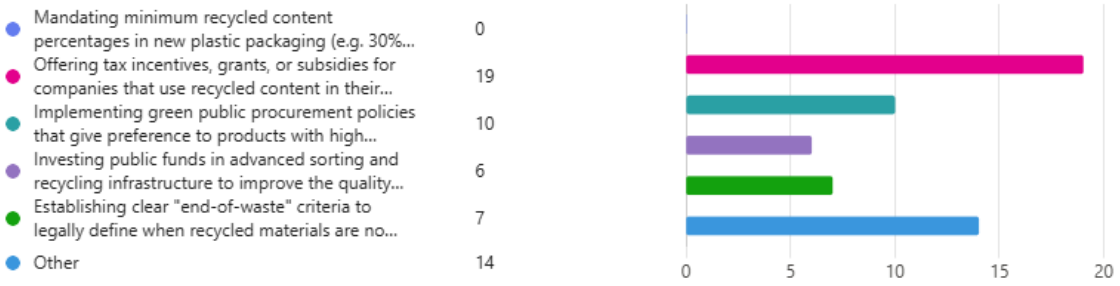
15. **In your opinion, what is the greatest barrier to establishing and scaling up reuse and refill models (e.g. for beverages, f ood, or household products)?**

30
Responses

Latest Responses
"NA"
"She nead a more container"
"Limited infrastructure and consumer awareness are the main barriers."
...

9 respondents (30%) answered system for this question.

16. **Which of the following policy measures do you believe would be most effective in creating a stable and viable market f or recycled plastic (secondary raw materials)? (Please select up to two).**



17. **Looking ahead towards 2030, what single policy action or investment do you believe would have the most significant p ositive impact on reducing plastic pollution and advancing a circular economy in the Western Balkans Six as a whole?**

30
Responses

Latest Responses
"Epr"
"Recycling Albania he can change the situation in Albania"
"Investing in regional waste collection and recycling infrastructure to ensure high-q... "
...

10 respondents (33%) answered Plastic for this question.

18. **To what extent do you agree or disagree with the following statement: "A harmonised regional approach in the Wester ns Balkans Six(e.g. common definitions, targets, and lists of banned SUPs) would be beneficial for my organisation/sec tor."**

19. **To effectively monitor progress towards a circular plastics economy, how would you rate the current domestic level avai lability and reliability of the following types of data?**