ROMA INCLUSION IN THE GREEN TRANSITION
– WESTERN BALKANS AND TÜRKİYE

Roma Integration Phase III

English edition:
Roma Inclusion in the Green Transition – Western Balkans and Türkiye

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Contents

List of Abbreviations

BAM	Bosnian Convertible Marks
CSO(s)	Civil Society Organisation(s)
DG ENER	The Directorate-General for Energy
DG ENEST	The Directorate-General for Enlargement and the Eastern Neighbourhood
EBRD	European Bank for Reconstruction and Development
EE	Energy efficiency
EIB	European Investment Bank
EIP	Economic and Investment Plan
ERRC	European Roma Rights Centre
ESG	Environmental, Social, and Governance
EU	European Union
FAO	United Nation's Food and Agriculture Organisation
FMET	The Federal Ministry of Environment and Tourism of the Bosnia and Herzegovina
GIZ	German Agency for International Cooperation
IPA	Instrument for Pre-Accession Assistance
IRCA	Institute of Romani Culture in Albania
KOSGEB	Small and Medium Enterprises Development Organisation of Türkiye
KPIs	Key Performance Indicators
LEAP	Local Environmental Action Plans
MESDND	The Ministry of Ecology, Sustainable Development and Northern Development
MESPI	The Ministry of Environment, Spatial Planning and Infrastructure
MHMRSD	The Ministry for Human and Minority Rights and Social Dialogue
MHRR	The Ministry for Human Rights and Refugees
MoFTER	Ministry of Foreign Trade and Economic Relations
NAP	National Adaptation Plan
NDC	Nationally Determined Contributions
NEET	Neither in Education, Employment nor Training
NGO(s)	Non-governmental organisation(s)
OECD	Organisation for Economic Co-operation and Development
OGG	Office for Good Governance
RCC	Regional Cooperation Council
REDI	Roma Entrepreneurship Development Initiative
RES	Renewable energy sources
RPL	Recognition-of-prior-learning
RS	Republika Srpska
SECAPs	Sustainable Energy and Climate Action Plans
SME(s)	Small and Medium-sized Enterprise(s)
UN	United Nations
UNDP	United Nations Development Programme
VET	Vocational Education and Training

Executive Summary

This regional study, conducted within the European Union–Council of Europe Joint Programme "***Roma Integration - Phase III***," examines how the green transition can become more socially inclusive by systematically integrating Roma communities across the Western Balkans and Türkiye. It provides the first comparative analysis linking Roma in-clusion frameworks with climate, energy, and environmental policies, covering seven Beneficiaries Albania, Bosnia and Herzegovina, Kosovo*, Montenegro, North Macedonia, Serbia, and Türkiye. The research combined desk analysis, stakeholder interviews, and field-based consultations to identify barriers, opportunities, and practical entry points for aligning social and environmental objectives.

Waste

Energy

Environment

Roma inclusion

First regional comparative study linking Roma inclusion with climate, energy and environmental policies across 7 Beneficiaries in the Western Balkans and Türkiye.

Desk analysis   Stakeholder interviews   Field consultations
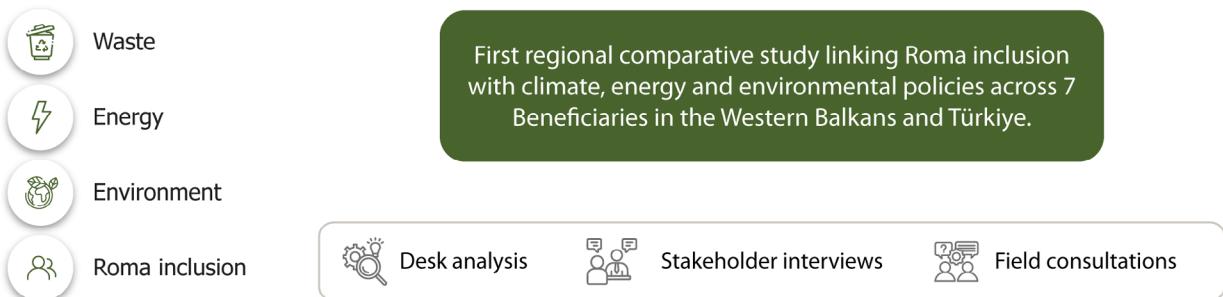
Overwiew of key findings (regional and Beneficiary level)

At the **regional level**, the study finds that Roma communities already contribute to the circular and green economy, particularly in waste collection, recycling, repair, agriculture and construction, yet remain excluded from the formal opportunities emerging through climate and energy reforms. The absence of integrated policy frameworks that connect Roma inclusion strategies with energy and climate plans, Green Agenda measures, and environmental programmes leads to lost synergies and persistent inequality.

KEY REGIONAL FINDING

Roma are already active here:

Waste collection

Repair & reuse

Agriculture

But are excluded here:

Energy programmes

Green construction

Climate finance
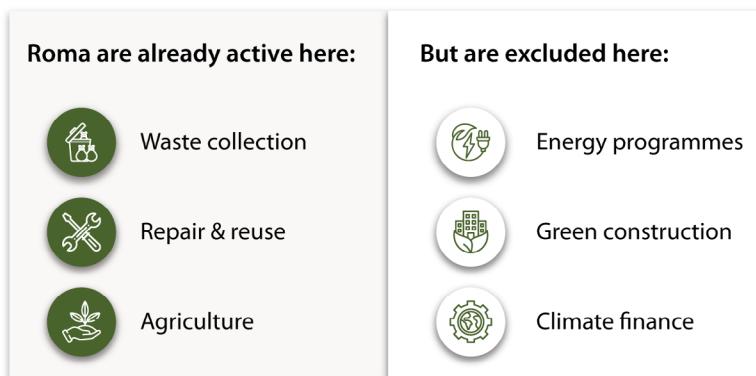
Roma already power the circular economy, but remain locked out of formal green transition opportunities.

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* All references to Kosovo, whether to the territory, institutions or population, in this text shall be understood in full compliance with United Nations Security Council Resolution 1244 and without prejudice to the status of Kosovo.

Across **Beneficiaries**, the evidence reveals consistent structural challenges:

- **Institutional fragmentation** between social and environmental ministries and agencies;
- **Eligibility barriers** related to tenure, documentation, or co-financing requirements;
- **Skills and certification gaps** that limit access to emerging green jobs;
- **Insufficient monitoring** of Roma participation in green measures; and
- **Gender and youth disparities** that compound exclusion, especially for Roma women and young people.

STRUCTURAL BARRIERS

Fragmented institutions	Documentation & tenure barriers	Skills & certification gaps	Weak monitoring	Gender & youth exclusion

These barriers repeat across all Beneficiaries, regardless of the specific context.

Nevertheless, each Beneficiary also demonstrates **positive entry points:** pilot projects linking waste management and inclusion, community cooperatives, modular skills training, and social-energy programmes that address both poverty and sustainability. Together, these examples illustrate a strong potential for scaling up inclusive green practices once institutional and regulatory barriers are removed.

Summary on conclusions and recommendations

The comparative evidence underscores that Roma inclusion and green transition agendas can and must reinforce one another. Achieving this requires three structural shifts:

1. **From parallel to integrated policies.** Roma inclusion must be embedded within energy, climate, and environmental frameworks, with shared budgets, indicators, and accountability mechanisms.

2. **From donor-driven to institutional delivery.** Municipal and central-level actors should assume long-term responsibility for inclusive implementation, supported by Roma mediators and Civil Society Organisations (CSOs).

3. **From rhetoric to results.** Inclusion outcomes must be measured, reported, and tied to financing conditions.

THREE STRUCTURAL SHIFTS

Parallel policies	→	Integrated Roma & green frameworks
Donor projects	→	Institutional delivery
Rhetoric	→	Measurable results
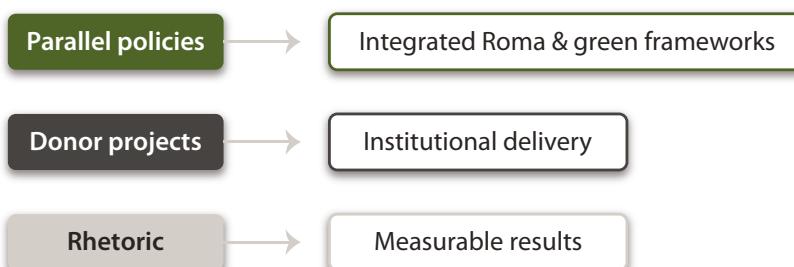
Three shifts required to turn inclusion into a functioning delivery system.

Based on these findings, the study advances regional-level recommendations across four thematic areas:

- **Governance and policy coherence –** Establishment of a Roma & Green Transition Taskforce and a *Roma-Green Scorecard* under regional cooperation structures (Energy Community, Regional Cooperation Council (RCC), Council of Europe).
- **Local delivery and monitoring –** Roma-sensitive municipal action plans, inclusive procurement, and disaggregated reporting frameworks.
- **Skills and employment –** Modular training and recognition-of-prior-learning (RPL) systems linked to actual vacancies and contractor demand.
- **Safeguards and justice –** Integration of equity screens[1], grievance mechanisms[2], and gender/youth-specific measures into all green programmes.

Snapshot of policy implications and potential pilot measures

The recommendations translate into a structured **portfolio of pilot models** that can demonstrate and replicate inclusive approaches to the green transition. The study identifies four priority pilot clusters with high scalability potential:

1. **Skills and Employment Pathways –** Short, modular training (80–120 hours) and paid practicums for Roma workers in energy efficiency, renewables, and circular-economy operations.

2. **Inclusive Green Entrepreneurship –** Support to Roma micro enterprises and cooperatives across circular-economy and low carbon sectors including reuse, repair, and recycling, renewable energy related services, green construction and sustainable agriculture, embedded in municipal and local service chains.

3. **Social-Energy Access Windows –** Simplified eligibility and mediation schemes enabling Roma households to participate in retrofit and renewable programmes despite informal tenure.

4. **Community Waste and Greening Models –** Public–community partnerships for inclusive waste management, buy-back centres, and local green public works.

FOUR PILOT CLUSTERS

Skills & Jobs	Green Entrepreneurship	Social-Energy Access	Community Waste & Greening
80–120h modular training + paid practice	Micro-enterprises in reuse, repair, recycling, EE services	Simplified access to retrofits & renewables	Public–community partnerships
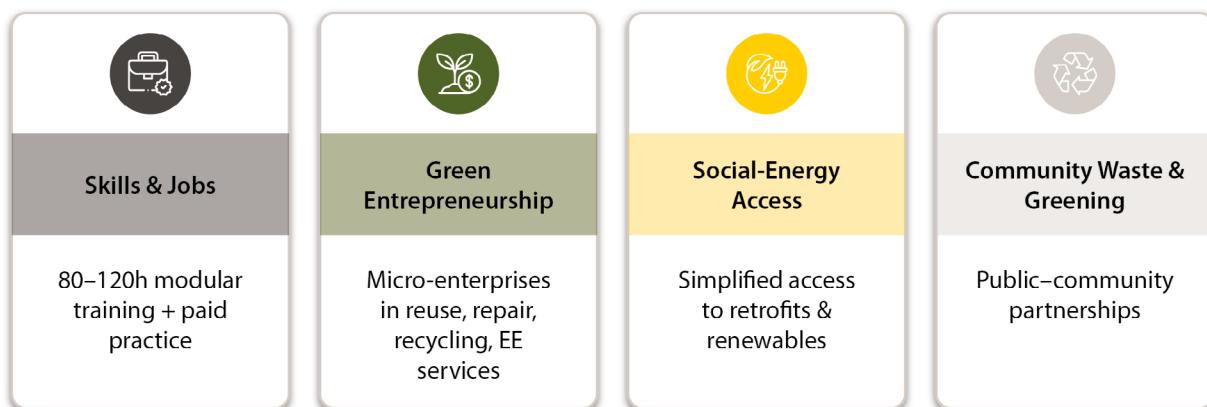
At the **regional level**, the study recommends creating a *Roma and Green Transition Pilot Hub* — a coordination platform for peer learning, data exchange, and replication of proven models. The Hub would align regional partners (all relevant stakeholders), maintain a common scorecard, and guide scaling-up efforts through shared toolkits and capacity support, as well as detect relevant funding opportunities to ensure sustainability and resource mobilisation.

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1 Equity screens refer to analytical tools used to evaluate whether policies, programmes, or investments distribute benefits and burdens fairly across different social groups. They help identify potential disproportionate impacts on vulnerable communities (e.g., Roma, low-income households, women, youth) and ensure that proposed measures enhance, rather than undermine, social equity. In the EU, similar approaches are more commonly referred to as distributional impact assessments, equality impact assessments, or social impact screenings, as reflected in EU Better Regulation Guidelines and Just Transition policies. Source: Just and Equitable Transition State Policy Framework (US Climate Alliance / Blue Green Alliance, 2022).

2 Grievance mechanisms are formal processes enabling individuals or communities to raise concerns, report harm, or seek remedy if negatively affected by a project, policy, or programme. Effective mechanisms are accessible, transparent, culturally appropriate, and include clear procedures for response and redress. Source: A Guide to Designing and Implementing Grievance Mechanisms for Development Projects (World Bank, Office of the Compliance Advisor/Ombudsman, 2008).

The central message is clear: **inclusion is not an add-on to the green transition but a condition for its success.** When Roma communities participate as workers, entrepreneurs, and citizens, green policies gain legitimacy, reach, and resilience, driving both environmental sustainability and social justice across the Western Balkans and Türkiye.

Roma worker → **Green economy**
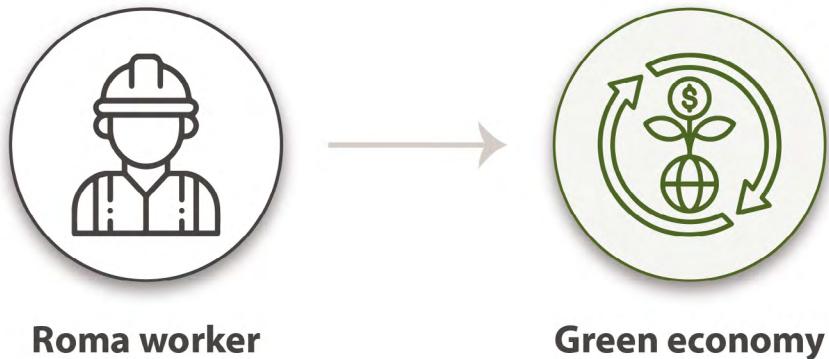
1. Introduction

This regional study is carried out within the ***Roma Integration - Phase III*** Joint Programme of the European Union and Council of Europe.

It builds on the dual priorities of supporting Roma inclusion in the Western Balkans and Türkiye and advancing environmental sustainability within the framework of the Green Agenda and European Union (EU) enlargement process, notably Chapter 27 (Environment and Climate Change). In the Western Balkans, the 2019 Poznań Declaration put Roma inclusion firmly on the Berlin Process agenda, with leaders pledging concrete targets across education, employment, health, housing, civil registration and non-discrimination, and explicitly linking Roma policies to the green and digital agendas. Subsequent Ministerial Conclusions have reaffirmed these commitments, welcoming progress on Poznań objectives and calling out next steps; several official updates likewise note the integration of a 'Roma dimension' within the region's Green Agenda/green transition efforts. The transition to a green economy creates new opportunities but also risks for Roma communities, who remain among the most excluded from education, labour markets, and decision-making. Against this backdrop, the study seeks to understand how the green transition can be made more inclusive and aligned with Beneficiaries' Roma strategies, socio-economic reforms, and EU integration requirements.

The overall objective is to assess the potential for Roma communities to participate in and benefit from the green transition, while identifying barriers and enabling factors. Specifically, the study will:

(i.)   map policies and initiatives at the intersection of Roma inclusion and green transition;

(ii.)   gather perspectives from key stakeholders, including Roma-led organisations, public institutions, employers, and education providers;

(iii.)   analyse Beneficiary-specific challenges and opportunities; and

(iv.)   develop both regional comparative insights and tailored recommendations, including pilot measures.

Geographically, the scope covers Albania, Bosnia and Herzegovina, Kosovo*, Montenegro, North Macedonia, Serbia, and Türkiye, with thematic focus on employment, skills, green economy sectors, policy awareness, and civil society engagement.

International and European normative frameworks relevant to the green transition

The green transition is anchored in a set of global and European normative frameworks that provide common reference points for climate action, sustainable development, and environmental governance. At global level, **the Paris Agreement** under the United Nations Framework Convention on Climate Change sets the direction for decarbonisation and climate resilience, while also recognising the importance of considering social impacts and equity dimensions when taking climate action.[3]

Complementing this, the **2030 Agenda for Sustainable Development and its Sustainable Development Goals** frame environmental action together with inclusion and development objectives.[4] In particular, SDG 7 (Affordable and Clean Energy), SDG 11 (Sustainable Cities and Communities), SDG 12 (Responsible Consumption and Production) and SDG 13 (Climate Action) reflect the interdependence between environmental sustainability and social outcomes, including reduced inequalities and equitable access to services and opportunities.[5]

At European level, these global commitments are operationalised through strategic governance frameworks and policy standards. The **European Green Deal** provides the overarching vision for climate neutrality, circularity and pollution reduction, and informs policy and investment priorities across the EU and the enlargement context.[6]

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3 The Paris Agreement, the United Nations Framework Convention on Climate Change, United Nations, 2015, available at: https://unfccc.int/sites/default/files/english_paris_agreement.pdf.

4 2030 Agenda for Sustainable Development and the Sustainable Development Goals, United Nations, 2015, available at: https://sdgs.un-.org/2030agenda.

5 Ibid.

6 Communication from the Commission to the European Parliament, the European Council, the Council, the European Economic and Social

The **8th Environment Action Programme** further translates these ambitions into priority objectives and enabling conditions through 2030.[7] Most recently, the Council of the European Union adopted conclusions on *"Europe's Environment 2030 – Building a more climate resilient and circular Europe",* calling for accelerated systemic action toward climate resilience and circularity and noting insufficient progress toward the objectives of 8th Environment Action Programme. [8]

In parallel, the **Council of Europe Strategy on the Environment (2025–2030)** links environmental protection to human rights, democratic governance and social cohesion, introducing an approach that supports the "Just Transition" lens and inclusive participation in environmental action. [9]

A further cornerstone is **rights-based environmental governance, notably through the Aarhus Convention,** adopted by United Nations Economic Commission for Europe which establishes rights of access to environmental information, public participation in environmental decision-making, and access to justice in environmental matters.[10] These procedural standards are directly relevant for Roma inclusion in the green transition because they provide a normative basis to assess whether marginalised communities can meaningfully participate in local green planning processes and benefit from environmental investments, rather than being reached only indirectly or informally.

Definition of the Green Transition and Just Transition (in the Context of Roma Inclusion)

The study applies the European Union's understanding of the **green transition** as the systemic shift toward climate-neutral, resource-efficient, and sustainable economies, as framed by the *European Green Deal*[11] and the *Green Agenda for the Western Balkans*[12]. This transition encompasses decarbonisation, circular economy practices, renewable energy, sustainable agriculture, and energy efficiency, and is closely linked with Chapter 27 of the EU acquis on environment and climate change.

The concept of a **Just Transition**, institutionalised through the EU's Just Transition Mechanism, complements this by ensuring that the social and economic costs of transition are fairly distributed, and that no region, worker, or community is left behind in the process.[13]

For the purpose of this study, these definitions are further contextualised in relation to **Roma inclusion.** A just and green transition in the Western Balkans and Türkiye requires addressing structural barriers that Roma communities face: limited access to quality education, vocational training, and green employment opportunities, as well as systemic exclusion from decision-making.[14] Without targeted measures, the green transition risks deepening existing inequalities by excluding Roma from emerging labour markets or increasing vulnerabilities such as **energy poverty**, which disproportionately affects Roma households due to substandard housing, inefficient heating, and higher relative energy costs.[15] By embedding Roma inclusion within the principles of Just Transition, the study frames environmental reforms not only as a path to sustainability but also as an opportunity to advance social justice, equal participation, and fair access to the benefits of the green economy.

Committee and the Committee of the Regions: The European Green Deal, European Commission, 2019, available at: https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=celex%3A52019DC0640.

7 Decision (EU) 2022/591 of the European Parliament and of the Council of 6 April 2022 on a General Union Environment Action Programme to 2030, European Union, 2022, available at: https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX%3A32022D0591.

8 Europe's environment: Council urges accelerated transition for a climate-resilient and circular Europe by 2030, Council of the European Union, December 2025, available at: https://www.consilium.europa.eu/en/press/press-releases/2025/12/16/europe-s-environment-council-urges-accelerated-transition-for-a-climate-resilient-and-circular-europe-by-2030.

9 Council of Europe Strategy on the Environment: United around our values for people and the planet (2025-2030), Council of Europe, May 2025, available at: https://rm.coe.int/council-of-europe-strategy-on-the-environement-2025/1680b5d582.

10 UNECE Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (Aarhus Convention), UNECE, 1998, available at: https://unece.org/environment-policy/public-participation/aarhus-convention/text.

11 European Commission, The European Green Deal, 2019, available at: https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal_en.

12 European Commission, Green Agenda for the Western Balkans, 2020, available at: https://enlargement.ec.europa.eu/system/files/2020-10/green_agenda_for_the_western_balkans_en.pdf.

13 European Commission, Just Transition Mechanism, 2020, available at: https://commission.europa.eu/strategy-and-policy/priorities-2019-2024/european-green-deal/finance-and-green-deal/just-transition-mechanism_en .

14 European Commission, EU Roma Strategic Framework for Equality, Inclusion and Participation 2020–2030, 2020, available at: https://commission.europa.eu/system/files/2021-01/eu_roma_strategic_framework_for_equality_inclusion_and_participation_for_2020_-_2030_0.pdf.

15 Roma Civil Monitoring. Roma Equality and Inclusion in Europe's Green Transition: Energy Poverty in Czechia, Hungary, Ireland and Slovakia, 2023, available at: https://www.romacivilmonitoring.eu/new-report-on-roma-and-energy-poverty-in-europes-green-transition/.

Graph 1: Where Green Transition Meets Roma Inclusion

Green transition

(EE, RES, circular economy, climate policies).

"Just green transition for Roma" – opportunities and risks

(access to green jobs, energy poverty, informal recycling, etc.).

Roma inclusion

(housing, employment, education, anti-discrimination).
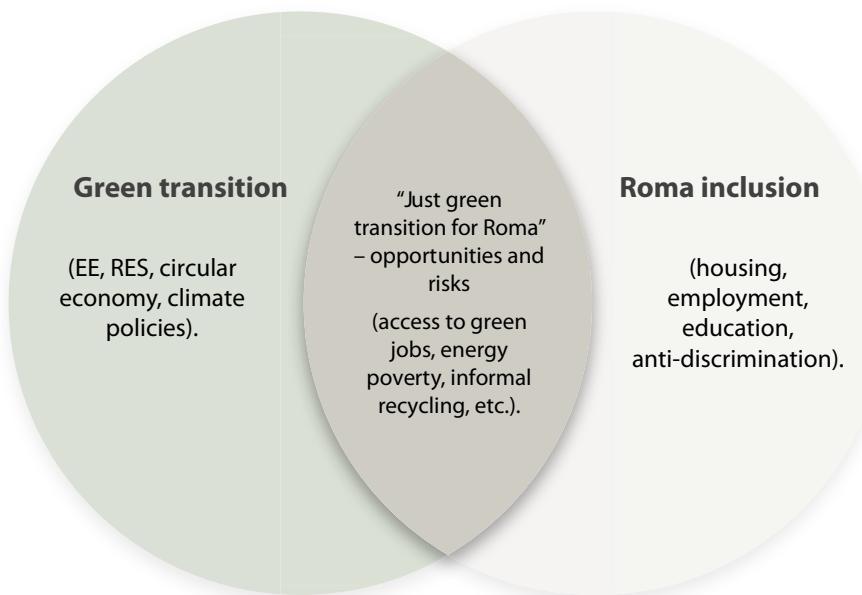
The study applies a mixed-methods approach designed to balance regional comparability with Beneficiary-specific depth. Evidence is generated through three interlinked steps: desk research, fieldwork with stakeholders, and integrated analysis and validation. This structure allows systematic triangulation of policy reviews and interviews, ensuring that findings are both robust and context-sensitive. Central to the methodology is the active engagement of Roma stakeholders, combined with adaptive implementation that safeguards quality while accommodating diverse economies' realities.

Graph 2: Study's results chain

Inputs
- EU/CoE programme,
- national strategies,
- Roma CSOs,
- data

Activities
- mapping,
- fieldwork,
- analysis,
- pilot design

Outputs
- regional overview,
- Beneficiary profiles,
- pilot models

Structure of the study

The study is structured to progressively move from framing and methodology to evidence, comparative analysis, and actionable outcomes. The first part (Chapters 1–2) sets the analytical foundation: it introduces the background, objectives, and scope, defines the concept of a green and Just Transition in the context of Roma inclusion, and explains the methodological design. This framing is not merely descriptive but clarifies how the research questions are situated within EU accession priorities, Roma strategies, and the Green Agenda. It also highlights the methodological choices—mixed methods, regional and Beneficiary-level integration, stakeholder engagement—that underpin the credibility and comparability of findings.

The middle part of the study (Chapters 3–4) constitutes the evidence base. Chapter 3 develops a regional overview, mapping socioeconomic conditions of Roma, business sector involvement, and civil society dynamics together with synthesis of findings thematically across Beneficiaries, on education and skills, labour market access, entrepreneurship, institutional engagement, and barriers to participation, enabling identification of regional patterns and divergences. Chapter 4 then zooms in on Beneficiary-specific contexts, providing tailored analysis and recommendations. This dual-level structure allows for both depth and breadth: individual chapters on Beneficiary reflect their specificities, while the comparative section ensures that cross-Beneficiary learning and structural gaps are systematically captured.

The final part of the study (Chapters 5–7) translates evidence into actionable outcomes. Chapter 5 formulates regional policy recommendations for governments, CSOs, donors, and private sector actors, embedding safeguards for Roma in Just Transition processes. Chapter 6 introduces pilot measures, presented both thematically and Beneficiary by Beneficiary, to test practical entry points for Roma inclusion in green transition policies. Finally, Chapter 7 draws lessons learned and suggests directions for future research and policy dialogue. In this way, the structure is deliberately outcome-oriented: it builds an argument step by step and culminates in a set of policy and practical measures designed to be both context-sensitive and regionally scalable.

2. Methodological Framework

2.1. Overall design and phases

The study applied a mixed-methods research design structured into three interlinked phases: desk research, field research, and analysis/validation. This approach ensured both breadth and depth, enabling the combination of existing evidence with newly generated data to capture Beneficiaries' specificities and regional trends across the Western Balkans and Türkiye. Desk research established the initial evidence base through the review of policies, strategies, statistical data, and project documentation, while field research generated primary insights from key stakeholders. The final phase integrated, validated, and analysed findings to produce actionable conclusions and recommendations.

Graph 3: Three phases of Study's development

1 Desk research	**2** Field research	**3** Analysis & validation
Review of Roma inclusion strategies, climate/energy policies, statistics, CSO reports.	Semi-structured interviews, stakeholder engagement.	Triangulation, regional synthesis, Beneficiary profiles, pilots.
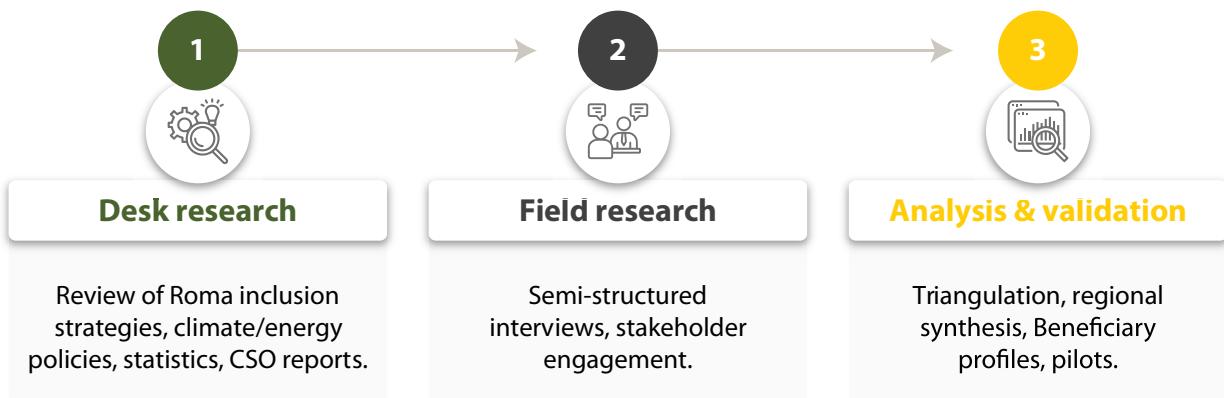
The design was deliberately iterative and adaptive, allowing for continuous refinement of research tools and approaches as new findings emerged. Challenges such as uneven data availability, difficulties in accessing specific stakeholder groups, or variations in contexts were addressed through timely adjustments, in close coordination with local experts. This flexibility ensured methodological rigour without compromising responsiveness to local realities.

The study also maintained a balance between regional comparability and context-specific characteristics. A dual-level structure, comprising Beneficiary-level chapters and an overarching regional synthesis, allowed for identification of shared challenges and opportunities, while also recognising the unique contexts of each participating economy. This ensured that findings were both comparable across economies and relevant within individual settings.

2.2. Research questions

The study was guided by a structured set of research questions, developed during the inception phase and validated with the Council of Europe. These questions provided the analytical framework for both desk and field research, ensuring coherence across the seven participating economies while also allowing context-specific features to be captured. They served as the basis for the design of interviews, and the desk review template, and they structured the subsequent analysis and synthesis at both Beneficiary and regional levels.

Organised into four thematic clusters—policy and institutional landscape, barriers and access to opportunities, role of Roma communities and civil society, and measures, models and recommendations—the questions reflect the study's dual ambition: to generate actionable findings within each Beneficiary context and to highlight common regional patterns. By presenting them explicitly in this report, the study ensures transparency of the research process and provides a clear link between objectives, methods, and findings.

The full list of research questions is presented below.

Policy and institutional landscape

1. To what extent are Roma included in central-level and local green transition strategies, action plans, or environmental policies?

2. What initiatives or programmes are in place to promote the inclusion of Roma communities in the Green Agenda and transition?

3. What role do local governments and municipalities play in promoting Roma inclusion in green initiatives?

4. What are the key policy and institutional gaps that hinder Roma inclusion in green transition efforts?

Barriers and access to opportunities

5. What are the main challenges and barriers Roma communities face in accessing and benefiting from green initiatives?

6. What are the main barriers Roma communities face in accessing education, training, and employment opportunities within the green economy?

7. What green jobs or sectors (e.g. renewable energy, energy efficiency, circular economy, sustainable agriculture) present realistic opportunities for Roma engagement?

8. What are the gender-specific or generational factors influencing Roma access to green opportunities?

Role of Roma communities and civil society

9. What is the current role of Roma CSOs and community actors in shaping green transition efforts?

10. How can awareness campaigns, education initiatives, or community engagement encourage more active Roma participation in the Green Agenda?

11. What are Roma community members' perspectives and aspirations regarding the green transition and how do these differ across Beneficiaries?

Measures, models and recommendations

12. What pilot measures could be introduced in each Beneficiary to improve Roma participation in the green transition?

13. What successful practices at the Beneficiary level could be scaled or adapted regionally?

14. What regional cooperation mechanisms or capacity-building programmes could support Roma inclusion?

15. What are the economic, social, and environmental benefits of greater Roma inclusion in green transition efforts?

16. What types of monitoring and evaluation mechanisms could be developed to assess progress at the level of specific Beneficiary and regional level?

Together, these research questions formed the foundation of the study's analytical framework and guided all stages of evidence collection. Both desk research and fieldwork were structured to respond directly to these questions, ensuring that findings are systematically comparable across Beneficiaries while remaining sensitive to local contexts. The following sections describe in detail the approaches used for desk research and field data collection.

2.3. Desk research approach

Desk research provided the foundation for the study, creating an initial evidence base against which field findings could be contextualised and validated. It involved a systematic review of Roma inclusion strategies, green transition and environmental policies, employment and skills datasets, and donor-funded programme reports. In addition, literature produced by civil society organisations, particularly Roma-led CSOs, was analysed to capture perspectives and evidence often missing from official sources. This process ensured that the study drew on a wide spectrum of materials, reflecting both institutional frameworks and community-level insights.

To ensure consistency across the seven participating economies, desk research was conducted using a standardised template. This template required experts to record findings under common headings, such as policy and institutional frameworks, barriers to inclusion, opportunities in green economy sectors, and examples of good practice. The use of a common structure facilitated comparability across the economies, while also leaving space for the inclusion of Beneficiary-specific nuances.

The outputs of desk research were twofold: first, they informed the development of the interview tools by identifying gaps in existing knowledge; second, they provided a structured body of secondary evidence that could be triangulated with primary data. In this way, desk research was not only a preparatory step but also an integral component of the overall methodology, ensuring that the study built upon existing knowledge while contributing new evidence to the field.

2.4. Field research: interviews

Field research complemented the desk review by generating new evidence directly from key stakeholders. It consisted of two primary methods: semi-structured interviews, both of which were designed to ensure comparability across the seven participating economies while remaining sensitive to local contexts.

Interviews were conducted primarily by local experts, using centrally developed semi-structured guides that were validated and then adapted to reflect Beneficiary-specific realities. The guides ensured that core themes, such as policy implementation, barriers to Roma participation in green sectors, and opportunities for skills development, were consistently addressed in each economy, while also allowing room for context-specific insights. Interviews were conducted in local languages and followed strict ethical protocols, including informed consent and anonymisation of notes. In total, the study carried out **40 interviews**, averaging 5.71 per Beneficiary.

This enabled triangulation of evidence and strengthened the validity of findings by capturing both in-depth perspectives and broader stakeholder trends. The full interview guides and questionnaires are included in the Annexes to this report, along with a detailed breakdown of interviews responses by Beneficiary and stakeholder type.

2.5. Stakeholder engagement

Stakeholder engagement was at the core of the study's methodology, both as a source of evidence and as a means of validating findings. The study recognised that meaningful participation of diverse actors, particularly Roma communities and their organisations, was essential to ensure relevance, legitimacy, and ownership of the results. Engagement therefore took place at multiple levels, encompassing government institutions, Roma CSOs, employers, education providers, donors, and international organisations.

Roma-led organisations and community representatives were consulted to capture lived experiences and priorities; central authorities provided insights into policy frameworks and implementation practices; private sector and employers highlighted labour market opportunities and barriers; and education and training providers assessed the availability and inclusiveness of skills programmes.

Engagement was not limited to data collection but extended to validation and feedback. Stakeholders were invited to reflect on emerging findings and recommendations through bilateral consultations. This iterative approach ensured that the study's outputs were not only evidence-based but also grounded in the perspectives of those most affected by or responsible for Roma inclusion in the green transition.

2.6. Triangulation and integration

A central feature of the study's methodology was the systematic triangulation and integration of findings from multiple sources. By design, the study combined desk research and interviews, each contributing complementary perspectives and types of evidence. Triangulation ensured that conclusions were not based on a single data source but validated across methods, stakeholder groups, and Beneficiary contexts.

Three levels of triangulation were applied. Cross-method triangulation compared evidence from desk research and stakeholder interviews, allowing verification of consistency or identification of divergence. Cross-stakeholder triangulation ensured that perspectives from Roma communities, authorities, employers, education providers, and donors were all considered, reducing the risk of bias towards any single actor. Cross-Beneficiary triangulation enabled comparative analysis across the seven participating economies, highlighting common trends while respecting their specificities.

Graph 4. Triangulation

Methods
(desk, interviews)

Integrated findings

Beneficiaries
(7 economies)

Stakeholders
(Roma communities, institutions, private sector, CSOs)
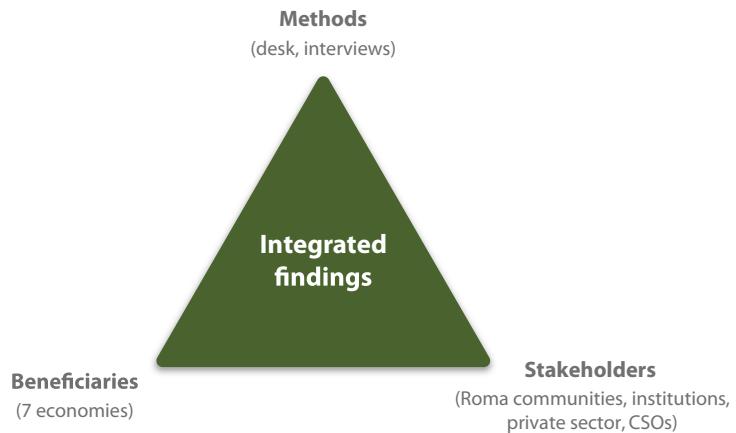
Integration of findings took place in two stages. At the level of each Beneficiary, data from different methods were synthesised into Beneficiary chapters, structured around the thematic clusters defined by the research questions. At the regional level, these insights were further analysed to identify shared challenges, transferable good practices, and scalable policy options. This process ensured that the final outputs, both recommendations and proposed pilot measures, were firmly grounded in evidence from multiple perspectives and levels of analysis.

Through this approach, triangulation acted as both a quality control mechanism and a tool for generating robust, nuanced insights.

2.7. Data limitations and ethical considerations

Despite careful design, the study faced a number of data limitations that influenced both the scope and depth of analysis. Reliable and up-to-date statistics on Roma participation in green sectors were often scarce, fragmented, or inconsistent across the participating economies. Access to stakeholders, particularly Roma communities, was occasionally constrained by socio-economic barriers, digital divides, or mistrust stemming from prior experiences with research. Variations in institutional availability and political developments also affected scheduling, creating delays or limiting access to certain public officials. Language and cultural differences posed additional challenges, requiring careful translation and contextualisation to ensure accurate interpretation of findings.

To mitigate these limitations, the study adopted a flexible and adaptive approach. The mixed-methods design allowed gaps in quantitative data to be complemented by qualitative insights from interviews, while triangulation across sources helped validate findings. The involvement of local experts was critical in facilitating access to communities, contextualising results, and ensuring cultural sensitivity. Research tools were translated and piloted to minimise misunderstandings, and contingency measures helped maintain sufficient coverage across economies.

The study adhered strictly to ethical standards throughout all phases of implementation. Informed consent was obtained from all participants, who were clearly informed of the study's purpose, voluntary nature, and their rights to confidentiality. Interview notes and responses were anonymised and stored securely, in line with General Data Protection Regulation[16] and the Council of Europe's data protection requirements[17]. Particular care was taken to avoid extractive practices when engaging Roma communities: interactions were conducted with respect for participants' time, perspectives, and trust, and findings were presented in a way that protects individual identities while reflecting collective experiences.

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16 Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, and repealing Directive 95/46/EC i.e. General Data Protection Regulation, available at: https://eur-lex.europa.eu/eli/reg/2016/679/oj.

17 The Council of Europe Regulations on the Protection of Personal Data (Resolution CM/Res(2022)14), adopted by the Committee of Ministers and entered into force on 1 January 2023 (available at: https://www.coe.int/en/web/tribunal/council-of-europe-regulations-on-the-protection-of-personal-data).

3. Regional Overview

Key messages

- Roma communities across the region have **environmentally relevant skills** (informal recycling, repair/reuse, agro-processing), but **lack formal pathways** into green jobs.

- Green-transition policies (Energy and Climate plans, circular economy strategies, waste reforms) and Roma inclusion frameworks **remain disconnected**, limiting equitable access to new employment opportunities.

- Private-sector engagement in green sectors is growing, yet **employer awareness of Roma as a labour source is low,** and cooperation models are rare.

- Vocational Education and Training (VET) systems and municipal programmes **are not adapted** to the needs of vulnerable groups, lacking modular training, on-the-job learning, and RPL mechanisms.

- Just transition risks are present: **professionalisation of waste systems could displace informal Roma workers** unless integration models and social safeguards are introduced.

- Significant potential exists for **regional learning and scaling of good practices**, especially the Skopje MoU and emerging circular-economy pilots in Albania and Serbia.

3.1. Socioeconomic profile of Roma communities across the Western Balkans and Türkiye

Albania

Fact:
Roma form the backbone of informal recycling, yet are excluded from formal waste and circular economy systems.

- ✅ Community waste & greening
- ✅ Inclusive green entrepreneurship

Bosnia and Herzegovina

Fact:
Green labour shortages exist, but Roma inclusion in energy efficiency and waste jobs is almost non-existent.

- ✅ Skills & employment pathways
- ✅ Community waste & greening

Kosovo*

Fact:
Green economy markets are still underdeveloped, leaving Roma with almost no formal green employment access

- ✅ Skills & employment
- ✅ Inclusive green entrepreneurship

Montenegro

Fact:
Energy-efficiency investments are growing, yet Roma households remain largely blocked by tenure and documentation barriers.

- ✅ Social-energy access windows

North Macedonia

Fact:
Energy poverty is widespread among Roma households, despite active national energy-efficiency programmes.

- ✅ Social-Energy Access Windows
- ✅ Skills & Employment Pathways

Serbia

Fact:
A strong recycling sector exists, but Roma participation remains informal and outside structured employment pathways.

- ✅ Inclusive green entrepreneurship
- ✅ Skills & employment

Türkiye

Fact:
Roma are deeply embedded in informal recycling and environmental labour, yet completely absent from green policy targeting.

- ✅ Community waste & greening
- ✅ Skills & employment
- ✅ Entrepreneurship

Legend:
Pilot clusters responding to Beneficiary-specific gaps

- Waste
- Renewables
- EE in buildings
- Agriculture
- Green entrepreneurship

Across the Western Balkans, Roma communities face persistent multidimensional exclusion with significant implications for human capital development and labour market participation. Regional survey data show that 62–78% of Roma youth aged 15–24 are neither in education, employment nor training (NEET), compared to 25–35% of their non-Roma neighbours.[18] Employment rates among Roma adults typically range between 18–27%, while 70–84% of Roma households live in poverty, several times above economies' averages.[19] Educational gaps remain substantial: only 15–25% of Roma children complete lower-secondary education, and fewer than 10% transition to upper-secondary pathways, creating a structural pipeline of labour market disadvantage.

Living conditions further entrench vulnerability. Between 50% and 65% of Roma households in the Western Balkans lack legalised housing, and 30–40% lack access to piped water or adequate infrastructure.[20] Informality dominates livelihood strategies, with many Roma working without contracts, social contributions, or income stability. Roma women face the steepest barriers: female employment rates in several Western Balkan economies fall between 5–15%, while NEET rates among young Romani women often exceed 80%, reflecting intersecting patterns of discrimination, educational exclusion, and unpaid care responsibilities.

In Türkiye, similar patterns of social and economic marginalisation are documented, though no official data disaggregated by Roma, Dom or Lom identity exist, as statistics do not record ethnicity. Instead, evidence comes from targeted academic studies and civil society research. A large survey covering 1,550 Roma households across 12 provinces found that 63.1% of employed Roma work in the informal economy, without contracts or social protection, and that income inequality within Roma communities (Gini[21] 0.43) exceeds the average (0.40).[22] Additional studies conducted during and after the COVID-19 period point to extreme income poverty, with average household incomes falling well below the economy's poverty line, widespread debt, and recurrent food insecurity.[23] Structural barriers in education, housing, employment and access to public services are consistently highlighted across this body of research.[24] Although not representative, these findings provide a robust indication of systemic exclusion comparable to that observed in the Western Balkans.

Across the region as a whole, the socioeconomic exclusion of Roma carries substantial macroeconomic implications. Regional analyses estimate that **Roma exclusion results in hundreds of millions of euros in lost productivity and fiscal revenues annually in the Western Balkans, underscoring the economic significance of strengthening Roma participation in education, training, and the labour market.[25]** In the context of demographic decline and rising skills shortages, especially in sectors relevant to the green transition, **investing in Roma inclusion represents not only a social obligation but also a strategic economic opportunity.**

3.2. Green transition opportunities and challenges for Roma

The transition toward low-carbon development, circular economy models, and resource-efficient infrastructure presents both immediate and long-term opportunities for Roma inclusion across the Western Balkans and Türkiye. Investment in renewable energy, energy-efficiency retrofits, waste management reform, green transport, and agro-processing value chains is generating new demand for entry-level labour, semi-skilled workers, and service providers. Many of these roles, such as waste sorting, collection support, repair and reuse, small-scale recycling, facility maintenance, and auxiliary construction trades, align with existing experience found in Roma communities. In several Beneficiaries, **Roma already participate in informal recycling, street-level collection, repair work, subsistence agriculture, and low-carbon mobility practices, offering a foundation that can be formalised and upgraded through targeted learning pathways, recognition of prior learning, and structured municipal or private-sector employment schemes.**

Despite this potential, access to green transition benefits remains uneven and limited. Structural barriers, including early school leaving, skills deficits, low digital literacy, limited access to VET and certification systems, weak transport links, and geographic isolation of many Roma settlements, hinder mobility into green jobs.

18 UNDP–World Bank–European Commission (2017). Regional Roma Survey. Available at: https://documents1.worldbank.org/curated/en/372571554413509160/pdf/Regional-Roma-Survey-Briefs.pdf.

19 World Bank (2019). Breaking the Cycle of Roma Exclusion in the Western Balkans. Available at: https://documents1.worldbank.org/curated/en/642861552321695392/pdf/Breaking-the-Cycle-of-Roma-Exclusion-in-the-Western-Balkans.pdf.

20 UNDP–WB–EC (2017), housing and infrastructure indicators.

21 Gini coefficient: A measure of income inequality within a population, ranging from 0 (perfect equality) to 1 (perfect inequality). Higher values indicate greater income disparity.

22 Bağçe, H. (2022). The Roma in Türkiye: Segregation in the Labour Market and Income Differentiations. Survey of 1,550 Roma households in 12 provinces. Available at: https://www.liverpooluniversitypress.co.uk/doi/10.3828/rost.2024.11.

23 Roma Memory Studies Association; Deep Poverty Network (2021–2023), surveys on Roma income, food insecurity and deprivation. Available at: https://www.duvarenglish.com/roma-in-turkey-suffer-from-lack-of-work-hunger-and-extreme-poverty-study-shows-news-60135.

24 Civil Rights Defenders (2022). Roma in Turkey: discrimination, exclusion, deep poverty and deprivation. Available at: https://crd.org/2022/11/03/roma-in-turkey-discrimination-exclusion-deep-poverty-and-deprivation.

25 Roma Foundation for Europe (2025). Western Balkans Growth at Risk Without Roma Inclusion. Available at: https://romaforeurope.org/work/articles/western-balkans-growth-at-risk.

Transitions from informal to formal work are particularly challenging: many Roma lack the legal identity documents or address registration needed for formal contracts; some face accumulated debts that reduce net earnings once formally employed; and loss of social assistance during initial months of formal employment may pose a deterrent. Settlement conditions compound these constraints: inadequate housing, insecure tenure, and lack of basic infrastructure frequently make participation in training or employment programmes difficult without parallel social and urban interventions.

Without deliberate inclusion measures, such as subsidised training, community-based delivery, on-the-job learning, and hiring incentives, the green transition risks reinforcing rather than reducing existing inequalities. Realising the full potential of the transition therefore requires aligning green programmes with social inclusion tools, ensuring that Roma communities can access, contribute to, and benefit from emerging green economy opportunities.

3.3. Regional trends in skills needs and employment gaps

Demographic pressures, out-migration, and declining labour force participation create an urgent need to expand the pool of available workers across the region. Green and circular economy sectors are among those experiencing the fastest growing demand. Skills shortages are persistent in:

- solar photovoltaic installation, maintenance, and auxiliary electrical tasks;
- energy-efficiency construction (insulation, facade works, carpentry);
- waste sorting, Materials Recovery Facility operations, and recycling-stream management;
- repair, reuse, refurbishment, and small appliance maintenance;
- agro-processing, packaging, and climate resilient food industry logistics.

These sectors share three characteristics that make them suitable entry points for Roma inclusion: (1) demand for workers consistently exceeds supply; (2) many roles require short, modular training rather than long formal programmes; and (3) tasks align with existing knowledge and experience in many Roma communities. With proper support, which include transport allowances, stipends, mentoring, simplified certification, Roma could realistically fill shortages in several green transition sectors.

However, current VET systems often lack flexible, modular pathways that accommodate learners with interrupted education; RPL mechanisms are underdeveloped; employer participation in curriculum design remains weak; and practical, on-the-job learning is insufficiently integrated. As a result, potential matches between Roma capabilities and labour demand remain underutilised. Strengthening VET-employer linkages, introducing micro-credentials, and piloting structured apprenticeships would significantly enhance labour market access for Roma in emerging green industries.

3.4. Business sector engagement and awareness across the region

Private sector participation in the green transition is expanding across the region, driven by EU alignment pressures, rising energy costs, sustainability commitments, and Environmental, Social, and Governance (ESG) reporting frameworks. Large and mid-sized companies in renewable energy, utilities, construction, manufacturing, and agro-processing increasingly recognise the need to green their operations and develop a workforce capable of delivering new technologies and services.

Companies in renewable energy, construction, utilities, agro-processing, and waste management report growing labour shortages, but do not systematically consider Roma as a potential labour pool. Only in few Beneficiaries, companies actively recruit from Roma communities in circular economy markets (notably Albania, North Macedonia, and Serbia). Buy-back centres, scrap yards, and Materials Recovery Facility exist in all economies, but partnerships with Roma collectors remain informal and unstructured.

Employer interest is highest where labour shortages are most visible i.e in construction sector, repair and reuse services, sorting facilities. But consistent outreach mechanisms are lacking. Kosovo* and BiH demonstrate the lowest aware-ness and least developed green markets, while Albania shows slightly higher readiness due to recent waste sector reforms. Across all Beneficiaries, companies cite the same barriers: perceived administrative burdens, unclear incentives, lack of municipal frameworks, assumed skills deficits, or limited exposure to diverse recruitment. In sectors like waste management, informal relations with Roma collectors exist in several municipalities, but structured models are rare: only isolated examples of MoUs, cooperatives, buy-back schemes, or contracting mechanisms exist, and most lack long-term institutionalisation.

SMEs, which dominate regional economies, face additional constraints: limited human resources management capacity, low awareness of green policies, and scarce resources to invest in training. Without targeted incentives, de-risking mechanisms, or municipal-level coordination, private sector engagement with Roma workers remains largely untapped, even where skills shortages provide a strong economic rationale.

Table 1 Cross-Beneficiary assessment of green transition conditions and Roma employment opportunities

Beneficiary	Active private-sector engagement in circular economy	Employer interest in hiring Roma	Identified labour shortages in green sectors	Presence of Materials Recovery Facility / buy-back facilities	Awareness of Roma inclusion
Albania	Moderate; reforms increasing private-sector involvement	Emerging but limited	Waste sorting, construction trades	Yes, mostly urban	Medium – highest among Beneficiaries
BiH	Low engagement; fragmented private sector	Very limited	Energy efficiency construction, waste operations	Yes, but informal linkages dominate	Low
Kosovo*	Very limited circular economy market; early stage	Very low	Construction, sorting; unmet demand	Small, scattered	Very low
Montenegro	Small-scale engagement; circular economy emerging slowly	Limited	Construction, energy efficiency retrofits	Minimal structured facilities	Low
North Macedonia	Active circular economy actors; Skopje leading in waste innovation	Moderate interest; MoU shows potential	Materials Recovery Facility operations, waste logistics	Strong presence	Medium
Serbia	Active recycling and reuse sector; growing ESG interest	Some interest, mostly local-level	Construction, repair/reuse, sorting	Extensive, but cooperation informal	Medium-low
Türkiye	Large recycling sector but not socially inclusive	Low; no structured inclusion pathways	Sorting, reuse, small repairs	Extensive private scrap network	Low

3.5. Roma access to green employment and entrepreneurship

Across Beneficiaries, Roma participation in green employment remains limited, fragmented, and largely informal. While informal recycling is the most prevalent activity, Roma also participate in a wider set of environmentally relevant sectors documented across the study. These include:

- repair and reuse services (small appliance repair, textile reuse, metal recovery),
- seasonal agro-processing and food industry value chains,
- elementary construction-related tasks relevant for energy-efficiency renovation,
- street-level cleaning and basic municipal environmental services,
- small-scale collection of secondary materials (metals, cardboard, plastics),
- and in Türkiye, broad engagement in low-tier recycling and urban environmental labour.

Despite this wide base of informal experience, **formal access pathways remain rare**. Municipal waste utilities, public enterprises, and private recycling companies seldom provide structured entry routes (apprenticeships, contracts, micro-credential training). The notable exception is Skopje's MoU, which stands out as a replicable practice for integrating informal collectors into municipal systems. Even though there is a lack of data on the proper implementation of this MoU in practice, it's worthwhile mentioning this example as a good starting point on the formalisation path.

Roma micro-entrepreneurs in reuse, repair, scrap trading, and small scale recycling face significant barriers:

- restrictive or expensive licensing requirements,
- accumulated debt that discourages formalisation,
- lack of a registered address or legal property,
- absence of municipal support structures,
- and limited access to micro-credit or guarantee schemes.

Energy efficiency and renewable energy subsidy schemes exist in nearly every Beneficiary, but **Roma households are effectively excluded:** property ownership, co-financing requirements, legalised housing, and digital application processes create structural blockages. None of the Beneficiaries has introduced Roma-sensitive or vulnerability-based access mechanisms to green subsidy programmes.

In the agricultural and agro-processing sectors, Roma engagement remains **predominantly seasonal and low-paid**, yet these sectors appear promising entry points for green transition pathways. Many food processing companies across the region face chronic labour shortages and are investing in energy-efficient production, waste minimisation, and sustainable sourcing—creating potential on-ramps for Roma jobseekers if supported through subsidised training, RPL mechanisms, and guaranteed interview schemes.

Donor funded green employment pilots remain isolated. The most mature examples appear in **North Macedonia** (Materials Recovery Facility pilots, inclusion models in Skopje), while **Serbia and Albania** show emerging smaller initiatives through circular economy projects.

Overall, while Roma communities possess relevant experience, often accumulated over decades, the transition from informal environmental labour into formal green employment requires deliberate enabling measures, cross-sector partnerships, and adaptive municipal frameworks.

3.6. Civil society involvement and enabling environment

Roma civil society organisations (CSOs), community mediators, women's groups, and youth organisations play a central role in building trust, reaching marginalised households, supporting administrative navigation, and maintaining engagement in education, training, and employment pathways. Their contribution is particularly crucial in green transition initiatives, where new processes, technologies, and administrative requirements may be unfamiliar to beneficiaries. Roma mediators and CSOs are often the only actors capable of ensuring continuity between outreach, enrolment, retention, and transition into employment.

However, the enabling environment for Roma CSOs remains weak. Funding is fragmented, short-term, and heavily donor-dependent; cooperation with municipalities varies widely; and CSOs are seldom included in formal consultation structures for Energy and Climate Plans, climate strategies, circular economy processes, or waste management reforms. Many environmental non-governmental organisations (NGOs), though increasingly active in community initiatives, lack experience working with Roma and may not perceive social inclusion as part of their mandate, as confirmed by the interviewed stakeholders in several economies.

Strengthening cooperation between Roma organisations and environmental actors would significantly increase the capacity of Beneficiaries to deliver socially inclusive green reforms. Key steps include establishing predictable funding streams, creating standing municipal partnership mechanisms, integrating Roma CSOs into Energy and Climate Plans and circular economy working groups, and developing joint programmes that combine environmental action with targeted social inclusion. Such measures would help ensure that green transition policies are both environmentally effective and socially equitable.

3.7. Barriers to Just Transition and Roma participation

Across all Beneficiaries, Roma face structural, institutional, and market barriers that prevent equitable participation in the green transition:

Structural barriers

- Inadequate housing and informal settlements blocking access to energy efficiency/renewable energy subsidies.
- Legal and documentation barriers (residency, identification documents, property titles).
- High levels of household debt reducing incentives for formalisation.
- Gendered constraints — Roma women face disproportionate care burdens and mobility barriers.

Skills and labour market barriers

- Limited access to VET, certification, and RPL mechanisms.
- Basic skills gaps: literacy, numeracy, digital skills.
- Distance to training centres, transport costs, inconsistent provision of stipends.
- Lack of on-the-job training or structured apprenticeships.

Institutional and governance barriers

- Parallel policy frameworks: Roma strategies and green policies rarely interact.
- Weak municipal authority in waste reforms; no inclusion mandates.
- Lack of de-risking tools for companies (wage subsidies, tax relief).
- Limited involvement of Roma CSOs in climate/circular economy policy design.

Market and private-sector barriers

- Employers unaware of Roma as a potential workforce.
- High informality in waste sector; no formal contracting pathways.
- SMEs lack human resources capacity for inclusive hiring.
- Prejudice and discrimination in hiring practices.

Risks for an unjust transition

- Green reforms that professionalise waste management systems may displace informal Roma workers.
- Subsidy schemes may reinforce inequality if eligibility remains tied to property ownership.
- Labour shortages in green sectors may be filled through migration rather than domestic inclusion.

3.8. Opportunities for regional cooperation and learning

The Beneficiaries share common challenges which creates strong potential for regional cooperation: informal waste collection, skills shortages, fragmented policy frameworks, and limited private-sector engagement. Knowledge transfer, peer learning, and model replication can accelerate progress and reduce duplication of efforts. Cross-Beneficiary mechanisms can build on promising practices such as Albania's emerging circular economy reforms, and Serbia's ecosystem of recycling enterprises. Opportunities include:

Regional learning opportunities

- **Replicating Skopje's integration model** for informal collectors through MoUs, contracting frameworks, and community-level buy-back points.
- **Developing regional RPL standards** for informal recycling, small repairs, energy-efficiency micro-skills, enabling mobility of green workers.
- **Joint development of Roma-sensitive energy efficiency/renewable energy access mechanisms**, including social quotas or simplified documentation models.
- **Shared donor platforms** to scale small green employment pilots into regional programmes.
- **Regional VET cooperation**, co-developing micro-credentials for green jobs relevant across Beneficiaries.

Institutional cooperation opportunities

- Establishing a **regional Roma and Green Transition Working Group** under RCC, the Council of Europe (CoE), or EU platforms.
- Cross-economy cooperation among municipalities on **waste sector inclusion**, including model contracts, technical standards, and municipal action plans.
- Strengthening **Roma civil society organisations (CSOs) networks across the region** to collaborate with environmental NGOs and climate-policy bodies.
- Aligning Energy and Climate Plans implementation with Roma inclusion through **shared indicators and monitoring frameworks**.

4. Beneficiary Profiles

The following section presents Beneficiary-specific profiles for each of the seven participating economies: Albania, Bosnia and Herzegovina, Kosovo*, Montenegro, North Macedonia, Serbia, and Türkiye. Each profile combines evidence from desk research and interviews, and is structured in a uniform way to ensure comparability across Beneficiaries while also capturing context specific particularities.

Each profile begins with an overview of the Roma population and the Roma inclusion and green policies context, situating the analysis within the demographic, socio-economic, and institutional realities of the Beneficiary. It then summarises the key findings from desk and field research, highlighting both policy frameworks and stakeholder perspectives. This is followed by a review of Beneficiary-specific opportunities and gaps, which identifies the most pressing barriers to Roma participation in the green transition as well as potential entry points for action. Finally, each profile concludes with proposed pilot measures and recommendations, tailored to the specific Beneficiary's context but aligned with the study's regional objectives.

By structuring the Beneficiary chapters in this way, the study ensures that both the diversity and the commonalities of experience across the Western Balkans and Türkiye are documented. Together, the profiles provide a detailed foundation for the regional synthesis and the formulation of policy options designed to foster inclusive green transitions.

4.1. Albania

ALBANIA
Beneficiary's dashboard

1. Spatial pattern of Roma settlements

Mostly urban and peri-urban Roma settlements, concentrated around larger cities (e.g. Tirana, Elbasan, Fier), often in informal or precarious housing areas near industrial or waste sites.

High share of informal housing

Frequent proximity to industrial and waste sites

2. Key numbers panel

Population:
~9,800 official; significantly higher unofficial estimates

Roma youth / NEET:
~76%

Informal work:
~62% of Roma employed informally

Economic loss of exclusion:
€259–488m productivity +
€28–64m fiscal (annual)

3. Policy snapshot box

Roma inclusion plan: Yes – 2021–2025

Green / NECP: Climate Law, Climate Strategy, NDC, NECP, NAP

Explicit Roma–green link: No

4. Challenges and opportunities

Main barriers:

- informal tenure blocking EE/RES access;
- low education;
- weak municipal capacity

Main opportunities:

- strong base in informal recycling;
- growth in solar, EE,
- agro-processing

Flagship initiatives:

- ACCTING/IRCA green micro-entrepreneurship;
- local recycling/repair pilots

4.1.1. Overview of Roma population and Roma inclusion and green policies context

This subsection provides an overview of the Roma population in Albania, highlighting demographic characteristics, socio-economic conditions, and key challenges faced in accessing education, employment, and public services. It also reviews the context for Roma inclusion and the broader green transition, including relevant strategies, institutional frameworks, and policy commitments. Taken together, this overview situates the Beneficiary-specific analysis within both the population realities and the policy environment shaping Roma participation in the green transition.

The Roma population in Albania is officially quite small, but unofficial estimates suggest it is substantially larger. According to the 2023 Albanian census, 9,813 persons identifying as Roma, or around 0.4% of the population.[26] However, civil society organisations, minority rights groups, and Roma leaders dispute these figures, arguing that many Roma are undercounted and that the numbers are higher.[27] Roma minority was recognised as a national minority in October 2017.[28]

The Roma community tends to be younger than the Albania's average: the mean age among Roma is about 26 years, compared to roughly 35.5 among Albanians generally.[29] Spatially, Roma are dispersed throughout Albania but often concentrated in specific enumeration areas; urban residency is high, with about 76.5% of Roma living in urban settings, compared to some 53.5% for the general population.[30]

Socio-economically, many Roma households in Albania experience higher levels of poverty, limited access to public services, and precarious living conditions. In informal settlements and outskirts of urban areas, Roma often lack secure tenure, have poor infrastructure, and experience service deficiencies including limited access to basic amenities.[31] Education attainment is low, with high rates of school dropouts among Roma children; discrimination and socio-economic barriers such as cost, distance, and family responsibilities often affect continuation beyond primary levels.[32]

Albania faces a rapidly shrinking labour force, projected to decline by 36% between 2022 and 2050, which will generate an annual demand for more than 30,000 new workers. At the same time, 76% of Roma youth are neither in employment nor education. This represents a major untapped labour market potential. If current exclusion patterns persist, Albania stands to lose between **€259 million and €488 million in productivity every year**, alongside **€28–€64 million in foregone fiscal revenues**.[33] These figures highlight both the economic cost of exclusion and the substantial growth gains that could be unlocked by integrating Roma into the workforce, especially given the demographic pressure on Albania's labour market.

Roma participation in Albania's recycling value chain is long-standing but largely informal. The European Environment Agency notes that the informal recycling sector is "mainly represented by the Roma community," with collectors recovering plastics and aluminium from street containers and at municipal landfills/dumpsites; however, the size of this workforce is not officially recorded.[34] Qualitative work in Tirana further documents the daily realities of Roma waste collectors (hazardous conditions, irregular earnings, and exclusion from formal municipal systems) while pointing to their practical know-how in materials sorting and market brokerage.[35]

Policy and regulatory shifts have sometimes criminalised or displaced informal recycling instead of integrating it. Research[36] on Tirana highlights periods when municipal measures curtailed "illegal" waste collecting, intensifying precarity for Roma and Egyptian recyclers; recent reportage[37] similarly calls for **recognising the dignity and environmental contribution of these workers** rather than treating them as a nuisance. At the same time, frameworks for

26 2023 Albania population and Housing census, Albanian Statistical Institute, available at: https://www.instat.gov.al/media/13626/cens-2023-census-botim.pdf.

27 Fact Sheet on Roma minority in Albania, Global Forum of Communities on Work and Descent, 2024, available at: https://globalforumcdwd.org/fact-sheet-on-roma-minority-in-albania/.

28 Law No. 97/2017 On the Protection of National Minorities in the Republic of Albania.

29 Roma and Egyptians in Albania: a socio-demographic and economic profile based on the 2011 census, UNDP, 2015, available at: https://files.acquia.undp.org/public/migration/al/Census-2011-Profile-of-Roma-and-Egyptians-final.pdf.

30 Ibid.

31 Roma access to quality and affordable housing in Albania, European Roma Grassroots Organisation (ERGO) Network, 2023, available at: https://ergonetwork.org/wp-content/uploads/2023/11/ALBANIA-Research-2023-Roma-Access-to-Housing-final.pdf.

32 Education of Roma Children in Albania", Merita H. Meçe, 2023, available at: https://www.researchgate.net/publication/374951247_Education_of_Roma_Children_in_Albania.

33 Roma Foundation for Europe, July 2024, "Boosting the Western Balkans' Growth", available at: https://romaforeurope.org/work/articles/boosting-western-balkans-growth.

34 European Environmental Agency, Municipal Waste Management: Factsheet Albania, 2021.

35 Klaudjo Veizi, Central European University, Working Conditions, Experiences, and Challenges of Roma Waste Pickers in Tirana, Albania, 2023.

36 Ibid.

37 "Albania's Waste Collectors and the Fight for Dignity" (Sapiens, 16 July 2024), available at: https://www.sapiens.org/culture/illegal-recycling-workers-pickers-albania.

integrated waste management and Albania's emerging circular economy roadmap are consolidating formal systems, creating both a risk of further exclusion and an opportunity to formalise roles through contracts, safety standards, and training.

Available data confirm that Roma and Egyptian communities often rely on informal work and the continue to be concentrated of Roma/Egyptian workers in activities such as collection of recyclables and street trade. The Roma Integration 2020 Albania Roadmap (drawing on United Nations Development Programme (UNDP) regional survey) estimated that 62% of Roma in Albania were engaged in informal work, far above rates among neighbouring non-Roma, and identified waste collection as a key income source. This existing experience can be a bridge to entry-level environmental jobs if pathways are deliberately designed: e.g., Materials Recovery Facility sorting and baling, municipally vetted collection points, and basic health-and-safety certified roles in waste services. Pairing these with short, on-the-job trainings and recognition of prior learning would help translate informal skills into formal employment.[38]

Pilot evidence is starting to show how this transition might work in practice. Under the EU-funded ACCTING programme[39], the Institute of Romani Culture in Albania supported Roma micro-entrepreneurs to adopt more sustainable practices (training, equipment, networking), with early reports indicating tangible business and environmental benefits—suggesting that small, targeted investments can move informal, low-margin activities toward safer and greener livelihoods. As Albania's National Energy and Climate Plan /circular economy agenda expands collection, sorting, and recovery infrastructure, these pilots provide a template for scaling inclusion (e.g., contracting community cooperatives for sorting, stipends for certification, provision of personal protective equipment, and formalised buyback schemes).

It is also forth mentioning that Albania's recycling rate remains comparatively low by EU standards (about 18–19% of municipal waste in 2022)[40], and reports acknowledge persistent informal employment across sectors—conditions that reinforce both the need and the feasibility of drawing experienced Roma recyclers into formal roles as new facilities and services come online.

Albania's economy still relies heavily on agriculture, which accounts for roughly one-third of total employment (about 34.9% in 2023).[41] The sector is dominated by smallholder farms and low formalisation. Yet Roma and Egyptian participation is markedly below the Albania average. It is estimated that only around 8% of employed Roma and approximately 5% of Egyptians work in the sector of agriculture, which reflects their limited access to land and inputs, high informality, and urban concentration in other livelihoods as the main reasons why relatively few Roma/Egyptians work in formal agriculture.[42]

On the policy side, Albania has over time developed a legal and institutional framework to support Roma inclusion. Key among these is the National Action Plan for Equality, Inclusion and Participation of Roma and Egyptians (2021-2025), adopted in November 2021, which builds on earlier plans and is coordinated across multiple ministries, municipalities, civil society, and Roma/Egyptian minority representatives.[43] It is designed to reduce gaps in access to quality public services between Roma/Egyptian minorities and majority populations.

Albania's climate and adaptation planning highlights agriculture as a **priority sector for resilience and low-carbon practices** (water management, soil/landscape measures, on-farm energy efficiency). Recent documents, such as the National Energy and Climate Plan, which sets out Albania's 2030 climate and energy objectives, and the National Adaptation Plan (NAP), which outlines priority adaptation actions across sectors, together with partner reports frame a transition toward climate-resilient farming, irrigation and landscape-level ecosystem-based adaptation.[44] These changes will require new skills and could open **entry points** for Roma in on-farm work, irrigation maintenance, tree-planting/erosion control, and basic renewable/energy-efficiency applications on farms.

There have been pilots and grassroots initiatives promoting green entrepreneurship among Roma micro-entrepreneurs in areas like Tirana, Berat, and Fier, aimed at both livelihood improvements and environmental sustainability.[45]

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38 Roma Integration Roadmap Albania 2019 – 2021.

39 More information available at: https://accting.eu/selected-pilot-projects/supporting-roma-micro-entrepreneurs-in-albania-towards-better-environmental-sustainability/.

40 https://db.nomics.world/Eurostat/cei_wm011.

41 World Development Indicators, World Bank, available at: https://databank.worldbank.org/reports.aspx?country=ALB%2CDOM&series=SL.AGR.EMPL.ZS.

42 Roma Versitas Albania, "An overview of the situational, legal and institutional framework of VET in Albania", available at: https://rvalb.org/country-assessment-research-in-albania/.

43 The National Action Plan for Equality, Inclusion and Participation of Roma and Egyptians for the period 2021-2025, available at: https://www.undp.org/albania/publications/national-action-plan-equality-inclusion-and-participation-roma-and-egyptians-albania.

44 The Ministry of Infrastructure and Energy of the Albania, National Energy and Climate Plan of the Republic of Albania, October 2024, https://www.infrastruktura.gov.al/wp-content/uploads/2024/12/The-National-Energy-and-Climate-Plan-NECP.pdf.pdf.

45 Supporting Roma micro-entrepreneurs in Albania towards better environmental sustainability is a project led by the Institute of Romani

The following sections synthesises the main evidence collected through desk research and interviews, in Albania. They summarise how Roma inclusion is currently reflected in green transition policies, how stakeholders perceive existing barriers and opportunities, and what practices or initiatives are already in place. The findings capture both institutional perspectives and the lived experiences of Roma communities, providing a balanced account of the current situation.

4.1.2. Policy and institutional framework for Roma inclusion and green transition

Roma inclusion is not yet explicitly mainstreamed in Albania's climate and energy policies.

Albania has a defined Roma inclusion policy framework and an increasingly structured climate/energy framework, but the two are only loosely connected in practice. The National Action Plan for Equality, Inclusion and Participation of Roma and Egyptians 2021–2025 is the central Roma policy instrument; it mainstreams access to services and socio-economic measures across ministries and municipalities, but it does **not** explicitly embed Roma in green transition delivery lines.[46]

On the "green" side, Albania's framework includes the Law on Climate Change, the National Strategy on Climate Change with mitigation/adaptation action plans, and updated Nationally Determined Contributions (NDCs)[47]; together with the (draft/finalising) National Energy and Climate Plan these set Albania's targets and name responsible institutions, with local authorities expected to prepare local environmental action plans. Direct Roma-specific provisions are absent in these climate/energy strategies. Interviewed government representatives confirmed that current strategies reference "vulnerable populations" and participation in general terms but do not contain a distinct Roma chapter or Roma-specific targets; coordination with social sector institutions occurs, yet responsibilities remain fragmented, and Roma targeting is not explicit.

Urban-planning and environmental practitioners who were interviewed noted that funding lines often separate green and social objectives, which makes inclusion hard to operationalise without dedicated budgets, criteria and outreach mechanisms. They suggested embedding inclusion requirements in donor/municipal co-financing to reward projects that demonstrate equitable access and measured participation. Environmental organisations similarly reported that while community activities are open to all residents, targeted engagement of marginalised groups requires partnerships with inclusion-focused actors and resources for mediation, transport, personal protective equipment and small certifications.

Regionally backed programmes frame the intent to link Roma inclusion with green priorities, but concrete, scaled measures in Albania remain limited. The EU–Council of Europe "Roma Integration – Phase III" explicitly references support around green and digital transitions; Albania participates in this action and in EU Roma support under Instrument for Pre-Accession Assistance (IPA) III, which emphasises socio-economic inclusion and alignment with EU frameworks. Pilot-type actions (e.g., small initiatives on green entrepreneurship among Roma) exist but remain fragmented and limited in scale. Stakeholder interviews characterised these regional mechanisms as useful entry points but largely project-based to date, with institutionalisation into delivery systems still pending.

Municipalities are formally part of Albania's energy climate governance: the National Energy and Climate Plan process and related guidance foresee active involvement of local authorities and periodic local environmental action plans. EU and donor communications also stress the need for municipalities to drive local green economies. However, desk sources note capacity gaps at local level that affect implementation quality; there is little evidence that municipal green plans presently mainstream Roma-targeted measures.[48] Interviewees emphasised the need for clear municipal guidance, earmarked resources, and the systematic use of community mediators to build trust and uptake in neighbourhoods where Roma live. Business association perspectives also indicated that, although demand for green skills is emerging, consistent data on Roma participation in green employment are scarce, highlighting a persistent linkage gap between inclusion policy and labour market activation.

Culture in Albania, aiming to to encourage Roma micro-entrepreneurs in Tirana, Fier and Berat to consider the benefits of developing environmentally aware companies and the impact they can have on the environment and society on the one hand, and the success of their own business and reputation on the other.

46 The National Action Plan for Equality, Inclusion and Participation of Roma and Egyptians for the period 2021-2025.

47 Nationally Determined Contributions (NDCs) are national climate action plans prepared under the Paris Agreement (2015), outlining each economy's commitments to reduce greenhouse gas emissions and adapt to climate change. Albania's Second NDC (2021) commits to reducing emissions by 20.9% by 2030 compared to 2016 levels, source: UNFCCC (United Nations Framework Convention on Climate Change) – NDC Registry, https://unfccc.int/NDCREG.

48 https://www.eeas.europa.eu/delegations/albania/green-cross-%E2%80%93-towards-local-green-economies-smart-investments_en.

4.1.3. Barriers and access to green opportunities

This section analyses the main constraints and enabling factors affecting Roma access to the green transition.

Structural and socio-economic barriers

Roma households are over-represented in informal settlements and substandard housing, often near landfills or environmentally degraded areas; this exposes them to hazards while also placing them outside formal programmes (e.g., energy-efficiency retrofits) that require legal tenure, meters, or documentation. Limited access to basic services (water, sanitation, secure electricity) further constrains participation in green schemes that presuppose stable housing conditions or co-financing.[49]

At local level, municipal capacity to operationalise inclusive green measures remains uneven; plans rarely contain Roma-specific targeting, and there is no routine monitoring of Roma participation in climate/energy programmes—making both outreach and evaluation difficult. This reflects the separation between climate/energy planning and Roma inclusion frameworks noted in Beneficiary's and donor documents.[50]

Interviewed stakeholders confirmed that Roma participation in environmental or climate projects remains mostly indirect and unrecorded. Many programmes are open to vulnerable groups in principle but lack formal eligibility adjustments, such as accepting alternative documentation or offering small grants for households without land titles. Local authorities rely heavily on donor or non-governmental organisations (NGOs) initiatives for outreach, leaving gaps where mediators or active Roma organisations are absent.

Roma community representatives and CSOs described persistent information barriers: families are often unaware of training or employment calls until after deadlines have passed, and communication channels depend on individual mediators rather than institutional systems. Administrative bias and complex application procedures were also cited as deterrents, especially where literacy or digital access is low.

Private sector and training actors emphasised structural employability barriers: low educational attainment, lack of formal qualifications, and the absence of recognition for informal experience (e.g., in recycling or construction). These factors limit Roma entry into certified green jobs in renewable energy, energy efficiency, and waste management, even where labour demand exists. Stakeholders noted that "train-to-hire" models, short modular courses with equipment and transport support, and municipal work placements tend to achieve better outcomes.

Gender- and youth-specific barriers compound these trends. Interviewees underlined that women face mobility constraints, unpaid-care responsibilities, and stigma that reduce participation in training or outdoor work, while young people, especially early school leavers, remain disengaged from both VET and municipal employment schemes. Flexible, local, and subsidised programmes were viewed as essential for their inclusion.

Education, skills, and employment challenges

Roma students in Albania continue to face high dropout risks and learning gaps, which translate into weak pipelines for VET and green-skills programmes. Recent sector analyses and rights reports point to persistent disparities at compulsory levels and beyond, with Roma/Egyptian learners among those most at risk of early leaving. These educational barriers, combined with low qualification levels, limit access to formally certified jobs in renewables, energy efficiency retrofits, waste management, and environmental services.[51]

Interviewed stakeholders noted that many Roma youths "struggle to re-enter the education or training system once they drop out," and that short, practice-oriented modules are more effective than long formal courses in maintaining engagement.

On the labour market side, NEET (not in employment, education or training) vulnerabilities remain salient, particularly

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49 Roma access to quality and affordable housing in Albania, European Roma Grassroots Organisation (ERGO) Network, 2023.

50 National Energy and Climate Plan of the Republic of Albania, the Ministry of Infrastructure and Energy of Albania, 2024, https://www.infrastruktura.gov.al/wp-content/uploads/2024/12/The-National-Energy-and-Climate-Plan-NECP.pdf.pdf.

51 Education Sector Analysis in the Republic of Albania, UNESCO, funded by EU, 2024, available at: https://csl.edu.al/wp-content/uploads/2024/09/390365eng.pdf.

for low-educated youth, and have a gendered profile (young women over-represented among NEETs). Without targeted bridging (remedial learning, recognition of prior learning, entry-level certifications), Roma youth are unlikely to benefit from emerging green-jobs demand.[52] Stakeholders also emphasised that employers rarely recognise informal experience, such as basic construction, recycling, or repair work, creating an additional barrier that could be mitigated through recognition-of-prior-learning mechanisms.

Emerging green sectors and opportunities

Given Albania's policy direction, the most plausible near-term opportunities are in solar photovoltaic and wind value chains (site prep, installation assistance, operation and maintenance support), building energy efficiency (basic insulation, window/door fitting support under supervised crews), and municipal waste/circular-economy services (sorting, Materials Recovery Facility operations, route support). Albania's National Energy and Climate Plan scenarios indicate job creation potential in solar/wind by 2030, while circular economy initiatives and donor programmes are expanding municipal waste systems—areas where Roma already have experience through informal recycling, if pathways to formalisation and training are provided.[53]

Several interviewees highlighted that entry-level "green jobs" are increasingly in demand but require short, applied training and partnerships with contractors to translate policy potential into real employment. They also pointed out that employers value reliability and basic safety awareness over formal qualifications, which opens a practical entry point for Roma workers if structured mentoring and certification are available.

A UNDP/United Nation's Food and Agriculture Organisation (FAO) assessment shows Albania's **agro-processing industry is modernising toward practices that support, reflect, or help achieve the United Nations (UN) Sustainable Development Goals (SDGs)[54]**, including the adoption of cleaner production technologies, improved waste and wastewater management, energy efficiency measures in processing facilities, and strengthened food-quality and safety standards (e.g., HACCP/ISO certifications). This creates **entry-level roles** (sorting, hygiene/sanitation, basic quality control) plus pathways into machinery operation and logistics if short training and employer partnerships are in place. Stakeholders from both community and business sides saw agro-processing and seasonal packaging as "realistic, socially acceptable work" for Roma women and youth, provided transport, contracts, and short-cycle VET support are ensured.

Gender and generational dimensions

Desk evidence shows young women face higher risks of inactivity/NEET status than young men, pointing to childcare, norms, and safety/transport constraints that can depress participation in training or field-based energy efficiency/renewables jobs. Tailored modalities (on-site displays, stipends, safe transport, mixed-modality training) will be essential for uptake. Youth overall face scarring from low educational attainment and limited work experience; Roma girls and young mothers are at particular risk of long-term exclusion without targeted outreach.[55] Interviewed Roma CSO representatives noted that many young women "would join if courses were held nearby and included childcare or transport," underscoring the importance of flexible local delivery models.

4.1.4. Opportunities and gaps

This subsection identifies the most important opportunities and gaps emerging from the specific context, providing an analytical bridge between the observed barriers (Section 4.1.2) and the pilot measures and recommendations (Section 4.1.6). It highlights both structural obstacles and actionable entry points through which Roma participation in Albania's green transition could be strengthened.

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52 https://www.undp.org/sites/g/files/zskgke326/files/2025-07/neets_profile_2023_final_instat_0.pdf.

53 National Energy and Climate Plan of the Republic of Albania, the Ministry of Infrastructure and Energy of Albania, 2024, https://www.infra-struktura.gov.al/wp-content/uploads/2024/12/The-National-Energy-and-Climate-Plan-NECP.pdf.pdf.

54 UNDP and FAO, "Stocktaking Report: Qualitative assessment of the SDGs principles and positive practices adopted by the main actors in Albania's agro-processing sector", 2023, available at: https://www.undp.org/sites/g/files/zskgke326/files/2023-12/stocktaking_report_agro-processing_sector_albania_221223.pdf.

55 UNICEF, "Situation Analysis of Children and Adolescents in Albania", 2021, available at: https://www.unicef.org/albania/media/4071/file/SituationAnalysisofChildrenandAdolescentsinAlbania.pdf.

Key policy and institutional gaps hindering Roma inclusion in green transition

Four major gaps stand out from the research:

1. **Missing policy linkage:** The Roma NAP focuses on core inclusion domains (education, employment, housing, services) but does not translate green goals (National Energy and Climate Plan and National Strategy for Climate Change into Roma-specific actions (e.g., access to green jobs, energy efficiency schemes for vulnerable households).

2. **Local delivery capacity:** Municipal responsibilities for environmental planning are growing, yet administrative and financial capacity constraints at local level limit the mainstreaming of Roma needs in green programmes.

3. **Programme scale and continuity:** Regional projects (e.g., such as Roma Integration - Programme Phase III) acknowledge green/digital transitions, but Albania-specific green-Roma initiatives remain pilot-scale, with limited pathways to institutionalisation.

4. **Data and monitoring:** Climate/energy strategies and the Roma NAP run on separate monitoring logics; there is no routine disaggregated tracking of Roma participation in green schemes (energy efficiency retrofits, renewable energy sources jobs, circular economy measures), making targeting and evaluation difficult (inference based on the absence of Roma-specific indicators in National Energy and Climate Plan / Nationally Determined Contributions (NDC) docs reviewed vs. detailed but non-green NAP indicators.).

Several stakeholders noted that the lack of coordination persist partly because social and environmental authorities operate under different funding and reporting systems. Without joint targets or shared indicators, inclusion "stays in policy papers rather than in budgets or contracts."

Opportunities (what can be done next)

- **Align Roma inclusion with climate/energy delivery lines.** Use the National Action Plan for Equality, Inclusion and Participation of Roma and Egyptians (2021–2025) as the social inclusion anchor and plug it into National Energy and Climate Plan /Climate Policy measures (energy efficiency retrofits, renewable energy sources roll-out, municipal planning). This means adding Roma-targeted access windows, simplified eligibility (for households lacking formal tenure), and outreach via Roma mediators in programmes implemented by line ministries and municipalities.

- **Local implementation with explicit Roma targeting**. National Energy and Climate Plan guidance already envisages an active role for **municipalities** in energy/environmental planning; build on this by inserting Roma-sensitive criteria into local action plans (e.g., social-energy measures, inclusive waste management). Pair this with donor-funded municipal capacity support to move from plans to delivery.

- **Near-term green jobs pathways**. Focus skilling/placement on entry-level roles where demand is growing and certification barriers can be managed: (i) **solar photovoltaic** site-prep/installation assistance and operation and maintenance support; (ii) **building energy efficiency** crews (insulation, basic fitting under supervision); (iii) **circular economy / municipal waste services** (sorting, Materials Recovery Facility operations, collection support). These areas align with energy-climate priorities and donor focus, and can build on existing (often informal) Roma experience in recycling if formalisation and training are provided.

- **Inclusive entrepreneurship pilots.** Scale small, demonstrated initiatives that back Roma **green micro-entrepreneurs** (repair, reuse, recycling services), coupling micro-grants with mentoring and market linkages; use CoE/EU instruments to mainstream pilots that already showed traction.

- **Gender- and youth-responsive access**. Increase uptake through stipends, childcare during training, safe transport, and modular courses that accommodate young women's and NEET youths' constraints; integrate recognition of prior learning to shorten pathways into entry-level green jobs.

Interviewees across stakeholders repeatedly highlighted the **role of intermediaries i.e. Roma mediators, employment offices, and inclusive NGOs, as "the only bridge between policy intent and community uptake." Strengthening these interfaces was seen as one of the most practical near-term opportunities.**

- **Policy linkage gap.** Roma inclusion and climate/energy strategies operate in parallel: the Roma NAP is strong on core services/employment but does not translate **National Energy and Climate Plan** measures into Roma-specific actions (e.g., targeted access to energy efficiency schemes, renewable energy sources jobs). This leaves inclusion largely implicit rather than operational.

- **Eligibility/tenure barrier.** Many Roma households lack formal tenure or metering, excluding them from standard energy efficiency retrofit or utility programmes that require documentation or co-financing; programmes need adapted criteria and social safeguards.

- **Municipal capacity and mainstreaming.** Local governments are tasked with environmental/energy planning but often lack the resources and guidance to embed Roma measures and track participation. Without practical toolkits and budgets, inclusion stays aspirational.

- **Pilot-to-system gap & monitoring**. Existing Roma-green pilots are **episodic** and not yet institutionalised; monitoring systems in climate/energy and Roma policies run separately, with **no Roma-disaggregated Key Performance Indicators (KPIs)** in National Energy and Climate Plan delivery. This hamper targeting, budgeting, and evaluation.

Dedicated inclusion programmes have begun to target Roma and Egyptian households with agriculture-linked training, scholarships and services (for example, an EU-supported initiative in Elbasan that couples education and employment support with municipal capacity-building). These examples show how awareness, skills and local delivery can be combined; however, they remain pilot-scale and will require scaling and Roma-sensitive eligibility (e.g., flexible land/tenure documentation) to achieve system-level impact.

Interviewees also stressed that institutionalising such pilots requires long-term funding and monitoring integration; "once the donor ends, the model disappears" was a recurring observation.

These findings underscore that progress will depend not only on policy linkages and municipal capacity, but also on how Roma community actors are engaged as partners in design and delivery. The next section examines the current role of Roma CSOs and community leaders, and how awareness, education, and participation can translate the identified opportunities into results.

4.1.5. Role of Roma communities and civil society

Roma organisations in Albania have begun to engage with the green agenda, but their role is emerging and mostly project-led rather than embedded in Albania's policymaking. A notable example is the Institute of Romani Culture in Albania (IRCA), which led the [ACCTING](#) pilot to support Roma micro-entrepreneurs in adopting environmentally sustainable practices, evidence that Roma CSOs can connect inclusion and green priorities when resources and mentoring are available. At the same time, much Roma participation around "green" issues still occurs informally (e.g., waste collecting), which remains precarious and outside formal policy channels. Regionally, the joint EU–Council of Europe Roma Integration – Phase III Programme lists green and digital transition among its priorities, offering an institutional channel for connecting Roma inclusion with climate and energy agendas; however, in Albania, mainstreaming into central level/municipal green policies remain at an early stage. Interviewed civil society practitioners described current Roma–green engagement as "promising but fragmented," noting that durable roles depend on multi-year funding and clear mandates within municipal delivery lines.

Desk sources indicate that capacity building and community-anchored outreach are effective levers. The Green-AL programme (2024–2027)[56] is strengthening environmental CSOs in Albania to participate in policy processes and

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56 Green-AL "Supporting Environmental Civil Society Organizations 2024 – 2027", Co-Plan, https://www.co-plan.org/en/green-al-ii-mbeshtet-ja-e-organizatave-mjedisore-te-shoqerise-civile-2024-2027/.

EU-acquis dialogues, an opportunity for Roma CSOs to partner with greener, more established actors and co-design inclusive local initiatives (e.g., social-energy measures, circular economy pilots). At regional level, the EU Roma Integration Award 2023 intentionally spotlighted projects linking green economy and Roma inclusion, signalling to stakeholders that awareness and education efforts should connect Roma participation to tangible green jobs and services. Albania's ACCTING pilot further suggests that practical training, equipment support, and community networking can translate awareness into sustained behavioural change among Roma entrepreneurs. Interviewees emphasised that joint outreach teams (environmental non-governmental organisations (NGOs) + Roma mediator) and modest participation supports (transport, childcare, personal protective equipment) "make the difference between interest and actual enrolment."

Community perspectives and aspirations

The research on Albania points to pragmatic aspirations: safer, more stable livelihoods and formalisation of existing green-adjacent activities (especially in recycling), alongside interest in training that leads to recognised jobs. Qualitative research on Roma waste collectors in Tirana documents hazardous conditions and exclusion from municipal systems, reinforcing demand for formal recognition, protective equipment, and fair market access. Complementary evidence from the ACCTING pilot shows positive reception to eco-upskilling and business mentoring, with participants reporting concrete benefits when environmental improvements are tied to income opportunities. Interview insights in Albania echoed these patterns, noting a clear interest in formal circular economy roles and other entry-level green jobs provided documentation, skills, and small-capital barriers are addressed. Community representatives also underscored a preference for "short, nearby, paid" opportunities linked to real vacancies or micro-contracts rather than long training detached from employment. Agriculture and agro-processing (sorting, hygiene/quality control, seasonal packaging) were also mentioned as acceptable entry points for Roma, especially for women, when transport, short training and formal contracts are ensured.

4.1.6. Measures, models and recommendations

This section summarises practical measures and pilot models designed to strengthen Roma participation in Albania's green transition. The recommendations respond directly to the barriers and opportunities identified in previous sections and reflect research questions 12–16. They combine evidence-based policy guidance with operational pilot concepts that are feasible within Albania's institutional, financial, and socio-economic context.

4.1.6.1. Summary of recommended measures

The following measures outline priority actions for aligning Roma inclusion with green transition policies and for building practical entry points into green sectors.

Policy and programme measures

- **Integrate Roma inclusion into climate and energy policies.** Link the National Action Plan for Equality, Inclusion and Participation of Roma and Egyptians (2021–2025) to the National Energy and Climate Plan and related climate policies. This integration should include Roma-targeted access windows, simplified eligibility criteria, and outreach through Roma mediators.

- **Introduce social-energy access windows.** In energy efficiency and renewable energy sources programmes, create dedicated windows allowing low-income Roma households—including those lacking formal tenure—to participate in retrofitting and small-scale photovoltaic initiatives.

- **Strengthen municipal inclusion in local green delivery.** Municipalities should embed Roma-sensitive criteria into local environmental and energy action plans, supported by donor-funded technical and financial capacity building. Interviewed practitioners stressed that without municipal budgets and explicit coordination between social and environmental departments, inclusion measures "remain paper commitments." Municipal energy-efficiency subsidy schemes, covering items such as heating systems, insulation, window replacement, façade renovation, or bicycles, should be adapted to ensure they reach Roma and other vulnerable households. This may include designing targeted programmes for these groups or introducing quota-based mechanisms within universal schemes to guarantee their participation.

- **Develop a joint Roma–climate monitoring framework.** Establish shared indicators linking Roma inclusion objectives with National Energy and Climate Plan implementation to improve data-driven monitoring and evaluation. Stakeholders also pointed out that consistent data collection and mediator-assisted outreach are essential for verifying who benefits from programmes and ensuring that progress can be tracked over time.

Operational and skills measures

- **Formalise Roma roles in waste and circular economy services**, while first assessing the legal, infrastructural, and urban conditions that determine whether formalisation is feasible. In many contexts, formalisation requires adequate living conditions, basic infrastructure within settlements, certification of skills, and registration with municipalities or operation under a legal entity. Depending on regulations, three pathways may be appropriate: (1) integrating Roma workers into public utility companies with fair remuneration and health-and-safety protections; (2) establishing or joining cooperatives or social enterprises that provide formal employment; or (3) individual registration as certified waste collectors who can sell materials to licensed collection points.

- **Create entry-level green-skills pathways.** Deliver short, modular trainings co-designed with VET providers and contractors to enable Roma access to emerging green jobs (solar photovoltaic installation and maintenance, energy efficiency retrofitting, waste sorting, Materials Recovery Facility operations). Where possible, these training programmes should be linked with subsidised employment schemes under the Operational Plan for Employment to facilitate job placement in the green sector.

- **Promote inclusive green entrepreneurship.** Scale up existing initiatives (e.g., ACCTING/IRCA) that support Roma micro-entrepreneurs in repair, reuse, and recycling services, providing micro-grants, mentoring, and formal links to municipal and private value chains. To make these measures sustainable, improve legislation and strengthen the wider social-economy support system, including tax incentives and grant schemes provided by employment service for entrepreneurs and workers in the green sector.

Cross-cutting Enablers

- **Ensure gender- and youth-responsive design.** Provide stipends, childcare, safe transport, and flexible training schedules to facilitate the participation of Roma women and NEET youth.

- **Foster regional peer learning.** Through the Roma Integration - Phase III and Energy Community mechanisms, establish exchanges and peer reviews on inclusive practices in green sectors.

Expected economic, social, and environmental benefits

- **Economic:** Strengthening Roma participation across green sectors—waste and circular economy services, energy efficiency roles, agro-processing, and green micro-entrepreneurship—can expand the local green labour force, reduce informality, and stimulate job creation in emerging value chains. Formal contracts, short-cycle training, and recognition of prior learning improve productivity and support local economies.

- **Social:** Improved access to stable green jobs (energy efficiency retrofits, renewable energy sources installation, operations in material recovery facilities, agro-processing) enhances income security, reduces discrimination, and creates safer working conditions. Targeted measures, such as stipends, childcare, transport, and persona protective equipment, strengthen inclusion for Roma women and youth, fostering greater participation in training and employment.

- **Environmental:** Roma participation in circular economy, renewable-energy and energy efficiency initiative supports Albania National Energy and Climate Plan/NDC targets by increasing waste diversion, improving resource efficiency, and contributing to clean-energy expansion. Entry-level roles in energy efficiency and renewable energy resources also help municipalities meet local climate commitments while advancing equitable community engagement in green transition measures.

4.1.6.2. Pilot models for implementation

The following pilot concepts operationalise the above measures and offer practical, scalable models for testing and replication.

ALBANIA - Pilot measures

Pilot 1	**"Social Energy Window":** Access to Energy Efficiency Retrofits for Vulnerable Roma Households

Objective:
Enable Roma households, especially those lacking formal tenure, to access energy-efficiency retrofits under simplified, safeguarded eligibility.

Target group:
Low-income Roma households in urban/peri-urban areas.

Delivery partners:
Line ministries, municipalities, energy efficiency contractors, Roma CSOs, social work centres.

Core activities:
Improve existing schemes at the municipal level to ensure targeted lots for Roma or set the quotas for mandatory inclusion of Roma. Adapt eligibility criteria (proxy means tests, community verification); Raise the awareness among the bank sector on the importance of inclusion of Roma. Train Roma CSO representatives to support outreach, applications and grievance handling while simplifying eligibility pathways for vulnerable families.

Indicative budget:
€350,000–€500,000 for 200–300 homes.

Key indicators:
• Number of homes retrofitted;
• share of informal-tenure households reached;
• energy savings (kWh reduction).

⚠️✅ **Risks & mitigation:**

Tenure disputes (attestations); contractor quality variance (third-party audits); low uptake (door-to-door outreach).

Pilot 2	**"Green Entry Tracks":** Short-Cycle Skills and Job Placement in Solar Photovoltaic and Energy Efficiency Sectors

Objective:
Create fast, recognised pathways into entry-level green jobs through short training and employer partnerships.

Target group:
Roma youth (18–29) and low-qualified adults, with priority to women and NEETs.

Delivery partners:
VET centres, certified contractors, Public Employment Service, Roma/women's CSOs.

Core activities:
Develop 80–120-hour micro-modules; implement recognition of prior learning; organise practical placements and guaranteed interviews; provide stipends and mentoring. Ensure strong employer participation in job-training activities, with private-sector partners contributing to training costs (e.g., at least 20%) to secure buy-in and facilitate direct pathways into employment.

Indicative budget:
€240,000–€360,000 for 100–150 trainees.

Key indicators:
• Completion and certification rates;
• job placements;
• retention after 6 months.

⚠️✅ **Risks & mitigation:**

Employer buy-in (co-design modules, bonuses); dropouts (stipends, flexible scheduling).

Pilot 3	**"Agro-Processing Starters":** Roma Employment in Food and Agro-Industry Value Chains

Objective:
Open entry-level jobs for Roma in fruit/vegetable and dairy processing through employer-led training and guaranteed interviews.

Target group:
Roma jobseekers near agro-processing clusters, with priority to women.

Delivery partners:
Agro-processors, VET schools, Public Employment Service, Roma/women's CSOs.

Core activities:
Develop short HACCP/hygiene modules; conduct plant practicums; provide stipends and coaching.

Indicative budget: €220,000–€320,000 for 100–150 trainees.

Key indicators:
• Employment and retention rates;
• wage progression;
• satisfaction scores.

⚠️✅ **Risks & mitigation:**

Seasonal volatility (aligned cohorts); dropouts (support measures); employer scepticism (co-design and bonuses). Exploitative practices in agro-processing (conduct employer due diligence; require written contracts, fair wages, and provision of health insurance as conditions for participation).

4.1.6.3. Monitoring, evaluation, and regional learning

To ensure these measures translate into sustained outcomes, a shared monitoring and evaluation (M&E) framework is essential.

In practical terms, the M&E framework should clarify (i) **governance** – who collects, validates, and reports (line ministries/ National Energy and Climate Plan unit, municipal departments, Public Employment Service, and Roma focal points); (ii) **data architecture** – how programme Management and Information System, municipal registries, and contractor reports feed a common dataset with sex/age/ethnicity disaggregation and privacy safeguards; (iii) c**adence** – quarterly dashboards for operations and an annual synthesis for policy; and (iv) **learning moments** – baseline, midterm review, and endline assessment to steer scaleup or course correction. It should track both **outputs** (participation, training, placements, retrofits) and **outcomes** (retention, kWh savings, income stabilisation), aligned with the gaps identified in Section 3.

These components are interlinked: bridging systems refers to aligning data and indicator frameworks; programme-level dashboards turn these data into operational tools; and regional peer review ensures learning and accountability across economies:

- **Bridge existing systems.** Develop joint indicators connecting Roma inclusion targets under the NAP with National Energy and Climate Plan implementation (e.g., Roma households in energy efficiency retrofits; Roma workers trained in renewable energy sources/ energy efficiency / Materials Recovery Facility roles).
- **Programme-level dashboards.** Require contractors implementing energy efficiency, renewable energy sources, and waste programmes to report disaggregated participation data quarterly, including completion, retention, and outreach metrics.
- **Regional peer review.** Use the European Union and Council of Europe Roma Integration – Phase III Programme and the Energy Community platforms to facilitate annual learning exchanges and to publish a "Roma and Green" scorecard comparing progress across the Western Balkans and Turkiye.

Together, these measures and pilot models provide a clear pathway for moving from ad hoc initiatives to structured, evidence-based programmes that embed Roma inclusion within Albania's green transition agenda while contributing to regional cooperation and learning.

4.2. Bosnia and Herzegovina

BOSNIA AND HERZEGOVINA
Beneficiary's dashboard

1. Spatial pattern of Roma settlements

Roma live mainly in and around urban and peri-urban areas (Tuzla, Zenica-Doboj, Sarajevo, Una-Sana, Bijeljina, Doboj, Brčko), often in deprived neighbourhoods with poor infrastructure and limited basic services.

Poor infrastructure and service deprivation

High environmental exposure

2. Key numbers panel

Population:

~12,600 official;
35,000–75,000 estimated

Housing:

High rate of insecure and substandard housing

Employment:

Predominantly **informal and seasonal**

Economic loss of exclusion:

€53.8–144.8m productivity +
€21.2–64.4m fiscal (annual)

3. Policy snapshot box

Roma inclusion plan: Yes – MHRR frameworks

Green / NECP: Fragmented climate and energy governance

Explicit Roma–green link: No / Very weak

4. Challenges and opportunities

Main barriers:

- housing/infrastructure deficits;
- minimal green VET access;
- fragmented governance

Main opportunities:

- labour demand in EE and waste services;
- modular EE/MRF training potential

Flagship initiatives:

- proposed Roma EE retrofits;
- green skills pathways

The profile of Bosnia and Herzegovina follows the same structure applied across all participating economies. It begins with an overview of the Roma population and the Roma inclusion and green policies context, presents the key findings from desk and field research, outlines Beneficiary-specific opportunities and gaps, and concludes with pilot measures and recommendations specific to Bosnia and Herzegovina.

4.2.1. Roma, inclusion and green policies

This subsection outlines the demographic and socio-economic situation of Roma communities in Bosnia and Herzegovina (BiH), as well as the policy environment linking Roma inclusion with the economy's emerging green transition agenda. It situates Roma participation within the broader context of environmental governance, energy and climate policy, and socio-economic challenges specific to BiH's complex institutional structure.

Demographic and socio-economic overview

Roma are the largest national minority in Bosnia and Herzegovina, officially recognised under the Law on the Protection of the Rights of Persons Belonging to National Minorities (2003). The last population census (2013) registered 12,583 persons identifying as Roma (0.36% of the total population), but unofficial estimates by Roma councils and civil society organisations suggest between **35,000 and 75,000 Roma** across the BiH.[57] The highest concentrations are found in Tuzla and Zenica-Doboj cantons, Sarajevo, Una-Sana, Bijeljina, Doboj and the Brčko District. The Ministry for Human Rights and Refugees (MHRR) of Bosnia and Herzegovina analysed data collected from local authorities in 2020 and estimated that 19,295 Roma, or 4,008 Roma families, need support in housing, employment, healthcare, and education. Of this population, approximately 51.6% are men and 48.3% are women. The age group with the highest representation among Roma in need is children and youth under 18 years old, accounting for around 39% of the total.[58]

Roma households in BiH are characterised by high poverty rates, informal housing, and limited access to basic services. A 2022 UNDP regional assessment found that over 60% of Roma families live without secure tenure and that about half lack access to adequate sanitation or regular waste collection.[59] Children's school attendance has improved over the past decade, yet dropout rates remain high at secondary levels. Employment remains largely informal and often seasonal; Roma adults are disproportionately represented in low-paid and unstable jobs, such as street trade, construction, and informal recycling.

Roma women face compounded barriers, including unpaid care burdens and gender-based discrimination, while youth experience long-term exclusion from formal employment and training systems. In Brčko District and several municipalities of the Federation, social-assistance programmes provide some limited relief, but coverage and adequacy remain low.

Education and skills

Education outcomes have improved slowly but remain well below BiH averages. Enrolment in primary school is comparatively high, yet **continuation to lower-secondary drops notably** and **upper-secondary completion rates remain very low**, with barriers including poverty-related absenteeism, transport gaps, early marriage (especially among girls), and occasional discrimination.[60]

Access to **VET** is particularly limited. Roma students constitute a very small share of total VET enrolments; targeted outreach into VET pathways that align with emerging "green" job profiles (energy efficiency retrofits, solar installation assistance, municipal waste and Materials Recovery Facility operations) is still rare.[61] Because most green entry roles require short, practical **modules plus basic certification and safety awareness, the absence of modular, flexible, and stipend-supported programmes** creates a structural bottleneck for Roma youth.

57 Agency for Statistics of Bosnia and Herzegovina (2016). Census of Population, Households and Dwellings in BiH 2013: Final Results.

58 Action plan of Bosnia and Herzegovina for Social Inclusion of Roma 2021-2025, Regional Cooperation Council, December 2020, p.6, available at: https://www.rcc.int/romaintegration2020/docs/156/action-plan-of-bosnia-and-herzegovina-for-social-inclusion-of-roma-2021--2025.

59 UNDP (2022). Regional Roma Survey: Western Balkans Findings.

60 Energy Community Secretariat (2024). BiH Energy Transition Tracker.

61 Federal Ministry of Environment and Tourism (2021). Strategy for Waste Management in the Federation of BiH 2021–2031.

Employment and livelihoods

Roma participation in the **formal** labour market is very low relative to the general population, with many adults engaged in **informal** activities such as street vending, scrap collection, short-term construction, and seasonal agriculture.[62] Women are substantially under-represented in formal employment, reflecting care burdens, mobility/safety constraints, and employer bias.

Bosnia and Herzegovina is facing substantial demographic pressure, with its workforce projected to decline by **25%** between 2022 and 2050, creating an annual need for nearly **49,000 new workers**. At the same time, **82% of Roma youth are neither in employment nor education**, which accounts for one of the highest exclusion rates in the region. This disconnect represents a significant missed economic opportunity. Current levels of Roma exclusion translate into an estimated **€53.8–€144.8 million in lost productivity every year**, alongside **€21.2–€64.4 million in foregone fiscal revenues**.[63] These losses underscore not only the scale of the challenge but also the potential gains for Bosnia and Herzegovina's labour market and public finances if Roma inclusion were meaningfully expanded.

The **Roma Employment Programme** (subsidies to employers and public works) implemented by the Agency for Labour and Employment and entity services has reached several thousand beneficiaries since 2009, but l**ong-term placement rates remain modest**, and programme scale is small relative to need. Given BiH's green policy trajectory, these instruments could be repurposed toward **"green public-works"** (community recycling, river clean-ups, tree-planting, basic energy efficiency tasks under supervision), pairing short training with paid placements.

The 2024 budget of the MHRR included funds totalling 50,000 Bosnian Convertible Marks (BAM) allocated for the employment of Roma. Entities, cantonal authorities, and employment services at the level of local self-government units were eligible to apply. The grant funds were allocated as follows: BAM 31,330 to the Federation of BiH, BAM 15,670 to the Republika Srpska, and BAM 3,000 to the Brčko District. Based on a public call for proposals, contracts for the use of grant funds were signed at the end of 2024 with the Federal Employment Institute (BAM 31,300) and the Employment Institute of the Republika Srpska (BAM 15,670). In March 2025, the Employment Institute of the Republika Srpska issued a public call for employment and self-employment, while the Federal Employment Institute is in the process of issuing its public call.[64]

Housing, health, and social protection

Roma housing investments coordinated by the MHRR since 2010 have **improved access to adequate dwellings** in many municipalities. However, **energy performance standards were not applied systematically**, leaving households exposed to energy poverty (inefficient heating, high energy burden, and associated health risks).[65] According to MHRR, in 2022, the mapping of Roma settlements highlighted the need to legalise 1,245 housing units across 17 local self-governments. Budget allocations were planned to support local self-governments in legalising these housing units; however, implementation has been lacking or delayed. In 2023, funds from the grant for Roma housing were allocated for the legalisation of seven residential buildings.

Health gaps persist: life expectancy is markedly lower than the BiH average; vaccination coverage and preventive care access lack in some localities; Roma women face compounded barriers in reproductive and gynaecological care.[66] Data from the Action Plan of Bosnia and Herzegovina for Social Inclusion of Roma 2021-2025 shows that approximately 30% of Roma individuals lack health insurance, with children under 15 comprising 34.7% of this group.[67] Social assistance is fragmented across entities and cantons, and eligibility criteria tied to documentation/residency can exclude families in informal settlements.[68]

62 Arnika & Centre for Ecology and Energy (2023). Air Pollution Hotspots in Bosnia and Herzegovina: Environmental Justice Perspective.
63 Roma Foundation for Europe, July 2024. Boosting the Western Balkans' Growth, available at: https://romaforeurope.org/work/articles/boosting-western-balkans-growth.
64 The Ministry for Human Rights and Refugees of the Bosnia and Herzegovina, August 2025.
65 Agency for Statistics BiH (2016). Census 2013: Final Results.
66 World Bank (2022). Roma Needs Assessment in Bosnia and Herzegovina.
67 Action Plan of Bosnia and Herzegovina for Social Inclusion of Roma 2021-2025, Regional Cooperation Council, December 2020, p.31, available at Action plan of Bosnia and Herzegovina for social inclusion of Roma 2021 – 2025.
68 UNICEF BiH (2023). Roma Children and Education in BiH.

Environmental exposure and informal green activities

Many Roma neighbourhoods are adjacent to industrial sites, landfills, or riverbanks affected by pollution. At the same time, **Roma informal recyclers** contribute to material recovery (metals, plastics, paper), yet operate without recognition, protective equipment, or integration into municipal systems. Formalising these roles, through buy-back points, personal protective equipment and occupational safety and health induction, cooperative contracts, and access to social insurance, would simultaneously **reduce environmental harms** and **create safer jobs.**

Municipalities have begun preparing **Local Environmental Action Plans (LEAPs)** and pilot **Sustainable Energy and Climate Action Plans (SECAPs)** under EU support (notably German Agency for International Cooperation (GIZ) and UNDP). Yet very few of these local plans mention vulnerable or minority groups, and none include Roma-specific targets.

Circular economy initiatives are still nascent, with recycling rates hovering below 10%. Informal recyclers—many of whom are Roma—play an essential but unrecognised role in recovering secondary materials from waste streams. They operate under precarious conditions, often without protective equipment, access to formal buy-back points, or social insurance. The **Waste Management Strategy of the Federation (2021–2031)** notes informal collection as a challenge but stops short of proposing integration pathways.[69]

Intersections between Roma inclusion and the green agenda

The overlap between Roma inclusion and the green transition in BiH is emerging but still weak. Roma participation in waste collection, metal recovery, and low-skilled construction already connects them to sectors undergoing "green" transformation. Yet this connection remains informal and unacknowledged.

Several donor and CSO initiatives demonstrate possible bridges:

- The **UNDP–Sweden "Green Recovery" project (**2021–2024) supported municipalities in energy efficiency retrofits and green jobs training, including some Roma beneficiaries through local employment services.

- The **Eda–Banja Luka "Circular Economy Roadmap"** included small-scale pilots with vulnerable workers in reuse and repair schemes.

- The **Centre for Ecology and Energy Tuzla** and **Arnika Czech Republic** have documented health and environmental impacts of coal-based pollution on marginalised settlements, calling for Just Transition measures targeting those communities.[70]

These examples show potential for aligning inclusion with green goals, but none are yet institutionalised.

4.2.2. Policy and institutional framework for Roma inclusion and green transition

The institutional framework for Roma inclusion in BiH mirrors the economy's administrative complexity. At **state level**, coordination rests with the **Ministry of Human Rights and Refugees (MHRR)**, which chairs the Council of Roma and manages the **Action Plan for Roma Inclusion (2021–2025)**.[71] Implementation is shared with entity and cantonal governments, local authorities, and Roma civil society. The plan addresses education, housing, health, and employment, but does not explicitly reference environmental or green transition measures.

At **entity level**, both the **Federation of BiH** and **Republika Srpska (RS)** have adopted sectoral strategies for employment, social protection, and energy transition that can indirectly support Roma inclusion, yet alignment is limited. In the Federation, Roma housing projects (co-funded by MHRR, municipalities, and donors) have improved access to adequate dwellings, sometimes accompanied by infrastructure upgrading; however, these initiatives rarely incorporate energy efficiency or green components. In RS, Roma inclusion is mainstreamed through the Ministry of Administration and Local Self-Government and through municipal action plans, but again without explicit environmental dimensions.

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69 Federal Ministry of Environment and Tourism (2021). Strategy for Waste Management in the Federation of BiH 2021–2031.

70 Arnika & Centre for Ecology and Energy (2023). Air Pollution Hotspots in Bosnia and Herzegovina: Environmental Justice Perspective.

71 Ministry for Human Rights and Refugees of Bosnia and Herzegovina (MHRR), Action Plan for Roma Inclusion 2021–2025, Sarajevo, 2021, available at: https://mhrr.gov.ba.

BiH's **EU candidate status (granted in 2022)** and alignment with the **Green Agenda for the Western Balkans** create a new policy entry point for integrating social inclusion and environmental sustainability. Yet Roma inclusion is still treated as a social issue, while green transition remains framed mainly as technical and economic modernisation.

Entity-level implementation lies primarily with the **Ministry of Labour and Social Policy of FBiH** and the **Ministry of Administration and Local Self-Government of RS**, while cantonal and municipal authorities carry operational responsibility for local measures. However, absence of a unified monitoring system leads to uneven application across entities. Interviewees (CSO representatives) explained that *"the main obstacle is not strategy but coordination and predictable funding, as every level works on its own island."*

The **Roma Committee at the Council of Ministers**, composed of representatives from across the BiH, provides policy input and oversight but lacks enforcement power.[72] Roma civil-society organisations, such as the Roma Women's Association "Bolja budućnost", Kali Sara, and **Euro Rom BiH**, are instrumental in implementing EU- and UNDP-funded projects in health, education, and employment. Stakeholders noted that Roma inclusion remains project-driven; there is no permanent institutional unit or budget line that ensures continuity once donors withdraw.

While the Action Plan explicitly recognises women and youth as vulnerable subgroups, it **does not integrate environmental sustainability or green transition dimensions**, even though many of its actions (e.g., housing reconstruction, public works) could naturally include energy efficiency, waste management, or climate resilience measures.

Environmental and climate governance in BiH is equally decentralised. The **Ministry of Foreign Trade and Economic Relations (MoFTER)** coordinates state-level obligations under the **Energy Community Treaty** and leads the preparation of the **Integrated National Energy and Climate Plan**, to be finalised by 2025.[73] Implementation responsibilities lie with entity ministries: in the Federation, the **Federal Ministry of Energy, Mining and Industry** and the **Federal Ministry of Environment and Tourism (FMET)**; in RS, the **Ministry of Energy and Mining** and the **Ministry for Spatial Planning, Construction and Ecology.**

Each entity operates its own strategic documents. Notably the **FBiH Waste Management Strategy 2021–2031** and the **RS Waste Management Strategy 2022–2032**, which guide waste, recycling, and energy efficiency policies.[74] Municipalities and local public utilities execute most environmental programmes, frequently under donor support (GIZ, UNDP, European Investment Bank - EIB). The **Brčko District** maintains an autonomous Department for Utilities and Environmental Protection.

A consulted stakeholders observed that the green transition in BiH is mostly treated as a technical agenda, managed by engineers and economists. Social aspects such as inclusion or equity rarely make it into official energy and climate discussions. This separation of domains is reflected institutionally, since there is no formal mechanism linking MoFTER (environment/energy) with MHRR (human rights and minorities).

The **Green Agenda for the Western Balkans Action Plan for BiH**, adopted by the Council of Ministers in 2021, constitutes the first policy framework linking climate, energy, and social sustainability. However, Roma and other vulnerable groups are **not included among target beneficiaries** or monitoring indicators.[75]

At local level, municipalities have developed **LEAP** sand **SECAPs** with donor assistance, but mapping of Roma settlements is rare. Interviewed stakeholders explained that Roma neighbourhoods are sometimes outside cadastral plans or municipal infrastructure zones, so they don't fall under any LEAP measure.

72 The Roma Committee of Bosnia and Herzegovina is an advisory body to the Council of Ministers of Bosnia and Herzegovina, established since 2002 with the aim of advancing the protection of the Roma minority in BiH. The responsibilities of the body were further defined in 2012 and its current members were appointed in 2022. The Roma Committee consists of 22 members: 11 Roma representatives, on behalf of the registered Roma associations, ensuring equal territorial representation, and 11 representatives of institutions of Bosnia and Herzegovina.

73 Energy Community Secretariat, NECP Progress Report: Bosnia and Herzegovina, 2024, available at: https://www.energy-community.org.

74 Federal Ministry of Environment and Tourism (FMET), Strategy for Waste Management in the Federation of BiH 2021–2031, Sarajevo, 2021, available at: https://www.fmoit.gov.ba , and Ministry for Spatial Planning, Construction and Ecology of Republika Srpska, Waste Management Strategy 2022–2032, Banja Luka, 2022, available at: https://www.vladars.net.

75 Council of Ministers of Bosnia and Herzegovina, Action Plan for Implementation of the Green Agenda for the Western Balkans in BiH, 2021, available at: https://www.mvteo.gov.ba.

There is no permanent **coordination body** between the Roma inclusion and environmental/energy policy frameworks. MoFTER reports to the **Energy Community** and EU Directorate-General for Energy (DG ENER), while MHRR reports to the Directorate-General for Enlargement and the Eastern Neighbourhood (**DG ENEST**) and the **Roma Integration 2020 initiative** - each under separate EU channels. As one institutional stakeholder commented, *"there is no table where these two policy families meet."*

However, cooperation occurs indirectly through **donor coordination.** Programmes like the **UNDP Green Recovery Project (2021–2024**), supported by Sweden, have combined local green-job creation with social inclusion components, including pilot activities employing Roma workers in municipal waste collection.[76] Similarly, the **EU4Energy Transition Project** (2023–2026), co-funded by the EU and GIZ, foresees cross-sectoral capacity building for vulnerable groups in energy efficiency and renewable-energy projects.[77]

The **Green Council of BiH[78]**, an independent expert platform working on environmental and sustainability issues, could serve as a convening space for integrating social inclusion considerations if its role were broadened to include vulnerable groups. The forthcoming **Employment Strategy 2023–2027** also offers potential for synergy, as it includes "green and inclusive jobs" as a horizontal objective.[79] Integrating Roma inclusion indicators in that strategy could institutionalise collaboration between labour, environmental, and social authorities.

BiH's parallel policy systems create **duplication, weak data exchange, and fragmented monitoring**. Roma inclusion remains primarily under the social-protection umbrella, while environmental and climate reforms are framed through economic and technical lenses. Municipalities often lack both Roma coordinators and environmental officers, which limits implementation capacity.

Nonetheless, several entry points for synergy exist:

- The upcoming **National Energy and Climate Plan** provides a direct opportunity to integrate Roma-sensitive indicators (e.g., energy-poverty reduction, access to sustainable housing, inclusion in green-skills training).

- The new Action Plan of Bosnia and Herzegovina for Social Inclusion of Roma for the period 2026-2030 is prepared and should be adopted by the end of 2025. It could introduce sustainability criteria and link housing grants with energy efficiency standards.

- **EU accession conditionality** now emphasises cross-sectoral inclusion; linking Roma and green agendas would demonstrate BiH's commitment to the European Pillar of Social Rights.

4.2.3. Barriers and access to green opportunities

This section analyses the main structural, socio-economic, and institutional barriers that constrain Roma access to Bosnia and Herzegovina's green transition, as well as the enabling factors that could promote inclusion in emerging environmental, energy, and circular economy sectors.

Roma households in Bosnia and Herzegovina remain disproportionately affected by poverty, spatial exclusion, and insecure housing. According to the most recent Roma Needs Assessment,[80] more than 70% of Roma families live in informal or substandard settlements, often adjacent to landfills, industrial zones, or flood-prone areas. These locations expose residents to environmental hazards while also placing them outside formal eligibility for energy efficiency retrofits, solar-installation grants, or water and waste infrastructure investments that require property titles and legal tenure.

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76 UNDP Bosnia and Herzegovina, Green Recovery Project Report 2024, Sarajevo, 2024, available at: https://www.undp.org/bosnia-herzego-vina.

77 EU Delegation to BiH and GIZ, EU4Energy Transition Project Overview, 2023, available at: https://eu4energytransition.ba

78 https://green-council.org/en/.

79 Ministry of Labour and Social Policy of the Federation of BiH, Employment Strategy 2023–2027, Sarajevo, 2023, available at: https://fmrsp.gov.ba.

80 World Bank, Roma Needs Assessment in Bosnia and Herzegovina, Washington, D.C., 2022, available at: https://documents.worldbank.org/en/publication/documents-reports.

Interviewed stakeholders confirmed that **green housing and energy programmes are rarely accessible to informal households**, even though many Roma families face high energy poverty. Administrative rules typically require official land titles, certified electricity meters, or co-financing contributions, criteria that most Roma cannot meet. As a result, even programmes notionally open to vulnerable groups tend to exclude Roma settlements in practice.

At municipal level, LEAPs and SECAPs seldom include explicit Roma targeting or monitoring provisions.[81] Interviewed stakeholders reported that inclusion depends heavily on donor projects or personal engagement by Roma mediators, as without them information simply doesn't reach Roma communities.

In several municipalities, overlapping competencies between communal utilities, social departments, and environmental offices create gaps in accountability.

Persistent documentation barriers also affect participation. Families without identification documents, registered addresses, or proof of residence cannot access grants for solar panels or home-insulation subsidies, even where technical eligibility exists. According to civil society organisations, **flexible eligibility and small co-financing waivers** would significantly increase inclusion in such schemes.

Education, skills, and employment challenges

Roma educational attainment in BiH remains the lowest of all population groups, which directly constrains access to VET and training for emerging green sectors. Recent labour market data underline the scale of low qualifications. In 2023, the Employment Institute of the Federation of Bosnia and Herzegovina identified 3,258 registered Roma jobseekers, of whom 1,630 were women; 2,876 of these individuals were classified as unskilled workers. The Employment Institute of Republika Srpska registered 106 Roma jobseekers (including 52 women, one person with a disability, and 80 unskilled workers), while the Employment Institute of the Brčko District recorded 315 Roma jobseekers, 166 of them women. These figures, provided by the Ministry for Human Rights and Refugees, illustrate how strongly Roma employment is concentrated in the lowest qualification categories.

At the labour market level, Roma face intersecting barriers such as informality, discrimination, and low skills. Many work in waste collection, recycling, or construction, but this experience is rarely recognised in certification schemes or green-skills programmes, limiting entry into emerging jobs in energy efficiency retrofits, renewable energy sources installation, or formal waste management. Roma women and youth are particularly vulnerable to exclusion: unpaid-care responsibilities, safety and transport constraints, and employer bias reduce women's participation, while young people who leave school early seldom join standard training offers. Interviewees from Roma civil society emphasised that **short, local training modules with transport or childcare support** are among the few measures that have consistently increased participation, especially for young mothers.

The Federation Employment Institute's pilot "Green Jobs for All" programme (2023) included Roma participants in public-works schemes such as urban greening, tree planting, and waste sorting. While results were positive, the pilot revealed systemic weaknesses such as temporary funding, unclear progression to formal jobs, and limited private-sector involvement, which indicate that more structured pathways and longer-term financing are needed for Roma to benefit from the expanding green labour demand.[82]

Institutional and administrative barriers

Fragmented governance remains a major constraint. Roma inclusion, employment, and environmental policy operate under different institutional umbrellas (MHRR, entity ministries for labour and environment, and municipal administrations), each with distinct financing and reporting lines. As a result, joint programming is rare.

Interviewed institutional stakeholders confirmed that **coordination across sectors occurs mainly through donor projects**, not domestic frameworks. For example, Roma employment and training measures under the Action Plan for Roma Inclusion (2021–2025) are implemented by local employment services, while green transition actions fall under MoFTER and entity energy/environment ministries. The absence of joint targets prevents overlap.

81 UNDP Bosnia and Herzegovina, Local Environmental Action Plans Review Report, Sarajevo, 2023, available at: https://www.undp.org/bosnia-herzegovina.

82 Federation Employment Institute, Pilot Programme "Green Jobs for All" Evaluation Report, Sarajevo, 2024, available at: https://fzzz.gov.ba.

A recent UNDP–Energy Community stocktake found that social inclusion is **not mainstreamed in BiH climate governance**, and that green reforms are designed "without structured participation from vulnerable communities."[83] Moreover, lack of disaggregated data by ethnicity in employment or energy programmes prevents evidence-based policymaking.

Stakeholders also noted that **administrative** bias, both conscious and unconscious, discourages Roma applicants from accessing employment or training programmes. Long forms, digital submission systems, and lack of outreach officers were cited as barriers.

Emerging green sectors and opportunities

Despite these challenges, several green transition sectors in BiH offer potential for Roma inclusion if access barriers are removed. The **National Energy and Climate Plan scenario** projects growth in renewable-energy jobs, particularly in small-scale solar photovoltaic installation, building energy efficiency, and municipal waste management, all areas where Roma have practical experience through informal work.[84]

Interviewed business associations indicated that **entry-level green jobs** increasingly demand basic technical and safety skills rather than formal tertiary education. Roma workers' existing experience in waste collection, recycling, or construction can be recognised through modular short courses. Employers emphasised reliability, attendance, and safety awareness as key employability factors, not necessarily formal certification.

Circular economy and waste management projects are also expanding through donor support. In Tuzla, Zenica, and Bijeljina, municipalities piloted inclusive waste sorting programmes under GIZ and UNDP projects employing Roma collectors in formal roles with protective equipment and health insurance.[85] These examples show that inclusion is possible when municipal incentives and mediation are built in.

In the **agro-processing and forestry sectors**, green-modernisation measures supported by FAO and the EU Green Transition Facility create potential seasonal and logistics jobs for low-skilled workers, especially in packaging, storage, and maintenance.[86]

Gender and generational dimensions

Gender inequality compounds these structural and employment barriers. Roma women face intersectional disadvantages: lower education, domestic-care burdens, and restricted mobility. Interviews revealed that few women participate in environmental or public-works schemes, primarily due to safety and transport issues. Stakeholders from NGOs pointed out that **training close to settlements and stipends for attendance** significantly increase women's participation.

Youth exclusion remains equally serious. Around 60% of Roma aged 18–24 are NEET (not in education, employment, or training).[87] Interviewees underlined that once Roma youth drop out of school, they almost never return to training unless it is nearby and includes a stipend.

Donor-supported VET initiatives, such as the "Green Skills for All" programme co-funded by the EU and UNDP (2023–2025), have piloted short energy efficiency courses for disadvantaged youth, including Roma participants. Evaluation data suggest high satisfaction and placement rates, confirming that **short modular, stipend-supported courses work better than long formal ones.** [88]

83 UNDP and Energy Community Secretariat, Mainstreaming Just Transition Principles in Western Balkans Energy Reforms, Vienna, 2024, available at: https://www.energy-community.org.

84 Energy Community Secretariat, NECP Progress Report: Bosnia and Herzegovina, Vienna, 2024, available at: https://www.energy-community.org.

85 GIZ and UNDP BiH, Inclusive Waste Management Projects: Lessons Learned, Sarajevo, 2023, available at: https://www.giz.de.

86 FAO, Green Transition in Agro-Processing Sector: Bosnia and Herzegovina Country Brief, Rome, 2023, available at: https://www.fao.org.

87 UNICEF Bosnia and Herzegovina, Roma Youth and Education Brief 2023, Sarajevo, 2023, available at: https://www.unicef.org/bih.

88 UNDP Bosnia and Herzegovina, Green Skills for All: Mid-Term Evaluation Report, Sarajevo, 2024, available at: https://www.undp.org/bosnia-herzegovina.

4.2.4. Opportunities and gaps

This subsection identifies key opportunities and remaining gaps emerging from Bosnia and Herzegovina's central level, entities' and local contexts. It builds on the analysis of barriers in Section 4.2.3 and provides an analytical bridge to the next part, which focuses on community participation and pilot measures. The discussion highlights both systemic obstacles and realistic entry points for enhancing Roma participation in the economy's green transition.

Key policy and institutional gaps hindering Roma inclusion in the green transition

Four main structural and policy gaps continue to shape the limited intersection between Roma inclusion and Bosnia and Herzegovina's green transition frameworks.

1. Missing policy linkage

The **Action Plan for Roma Inclusion 2021–2025** remains the central policy instrument for Roma integration but does not explicitly address the environmental or green transition agenda. Meanwhile, the **Integrated National Energy and Climate Plan**, in preparation under the **Energy Community Treaty**, does not include Roma or vulnerable communities among its indicators or beneficiaries. The two frameworks operate on parallel tracks, with separate reporting obligations to DG ENEST (social inclusion) and DG ENER (energy/climate). This disconnect prevents mainstreaming of Roma-sensitive approaches into key reforms, such as **energy efficiency retrofits, renewable-energy deployment**, and **municipal waste management modernisation.**

2. Limited local delivery capacity

Municipalities are formally responsible for implementing environmental and energy efficiency measures through **LEAPs** and **SECAPs**. However, few local governments have dedicated Roma coordinators or sufficient resources to adapt green programmes to vulnerable groups. Local officials often rely on donor funding for both planning and implementation, which undermines continuity once external support ends. Municipalities such as Tuzla, Zenica, and Bijeljina have piloted inclusive waste management initiatives through UNDP and GIZ, but these remain exceptions rather than the rule. Administrative fragmentation between communal utilities, social departments, and environmental offices further complicates mainstreaming of Roma measures into green schemes.

3. Programme scale and continuity

Roma-related green or circular economy initiatives in BiH are predominantly pilot projects funded by international partners, for example, **UNDP's Green Recovery Project (2021–2024)** and **EU4Energy Transition (2023–2026)**, rather than institutionalised programmes. These projects demonstrate proof of concept but lack mechanisms for long-term absorption into public budgets. Without clear follow-up or replication pathways, results dissipate once donor cycles close. This reliance on external financing limits the scale and sustainability of inclusion.

4. Data and monitoring gaps

Data fragmentation severely restricts evidence-based policymaking. The **Roma Action Plan** tracks inclusion indicators (education, housing, health, employment) but does not collect environmental or energy data. Conversely, **energy efficiency and climate programmes** collect technical data without social disaggregation. There are no Roma-specific indicators in the National Energy and Climate Plan or **Green Agenda Action Plan (2021)**, making participation untraceable and evaluation impossible. Additionally, weak information exchange between entity statistical institutes and line ministries leads to inconsistent data across the Federation, Republika Srpska, and Brčko District.

Stakeholders generally emphasised that these institutional silos persist partly because **social and environmental authorities operate under distinct funding, reporting, and donor systems**, with no shared targets or budget lines.

Opportunities – what can be done next

Despite these structural gaps, the ongoing energy and climate reforms in BiH provide several tangible opportunities to bridge Roma inclusion with green transition delivery.

1. Align Roma inclusion with climate and energy-delivery lines

The Action Plan for Roma Inclusion 2021–2025 could serve as the social anchor within National Energy and Climate Plan implementation. Ministries responsible for energy and environment (MoFTER, FMET, RS Ministry for Spatial Planning, Construction and Ecology) could incorporate Roma-sensitive eligibility rules and social safeguards into energy efficiency retrofits and renewable energy schemes. This includes accepting alternative documentation for households lacking formal land tenure, enabling Roma families to access subsidies for insulation, heating upgrades, or rooftop solar systems. Collaboration between MoFTER and MHRR would ensure that inclusion measures are built into upcoming energy-poverty reduction programmes supported by the EU and the Energy Community Secretariat.

2. Local implementation with explicit Roma targeting

Municipal-level planning offers the most direct avenue for practical inclusion. Integrating Roma-sensitive measures into LEAPs and SECAPs - such as social-energy measures, targeted waste management jobs, or climate-resilient housing - can translate high-level policy commitments into local action. Donor-funded technical assistance could support municipalities in developing inclusive project pipelines and introducing **community-based monitoring tools.** The **Green Council of BiH** could also be leveraged to share inclusive practices among local authorities.

3. Near-term green-jobs pathways

Labour market data suggest that **renewable energy installation, energy efficiency retrofits**, and **waste and recycling management** represent the most immediate job-growth areas. Roma workers, particularly men with informal construction or recycling experience, could transition into these sectors through short, modular VET courses and on-the-job training. Programmes like **Green Skills for All** and the **Federation Employment Institute's "Green Jobs for All"** pilot demonstrate that short, practice-oriented training combined with stipends and mentoring can achieve high retention and employability rates. Ensuring these programmes include Roma participants through quota-based or outreach mechanisms would strengthen inclusive green employment.

4. Inclusive entrepreneurship pilots

Several donor-supported pilots have successfully linked inclusion and circular economy, notably **UNDP's Local Green Entrepreneurship Initiative (2023)**, which provided micro-grants and mentoring to socially disadvantaged entrepreneurs, including Roma micro-collectors and recyclers.[89] Scaling such initiatives could institutionalise Roma micro-entrepreneurship in recycling, repair, and reuse services. These small-scale interventions align well with both social and environmental objectives.

Remaining gaps – what still blocks progress

Despite progress and donor-driven innovation, several issues continue to constrain systemic change:

- **Policy alignment remains incomplete:** Roma inclusion and climate/energy strategies still operate separately. While references to social equity appear in the Green Agenda Action Plan, there is no binding mechanism to ensure Roma participation in energy efficiency or renewable programmes.

- **Eligibility and tenure barriers:** Many Roma households lack legal property rights or formal energy connections, excluding them from standard retrofit schemes that require ownership documents or co-financing. Adapting eligibility rules to recognise informal tenure remains a key challenge.

- **Limited municipal capacity:** Local authorities have neither dedicated staff nor financial autonomy to integrate Roma-sensitive components into environmental projects. Without practical toolkits and budgets, inclusion stays rhetorical.

- **Pilot-to-system gap and monitoring:** Existing pilots are short-lived and lack mechanisms for institutionalisation. Climate and inclusion policies use distinct monitoring frameworks, with no Roma-disaggregated indicators or annual reporting.

These challenges indicate that progress depends not only on stronger policy linkages and local capacities but also on systematic inclusion of Roma actors (mediators, NGOs, and coordinators) as partners in the design and delivery of green measures.

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89 UNDP Bosnia and Herzegovina, Local Green Entrepreneurship Initiative Report, Sarajevo, 2023, available at: https://www.undp.org/bosnia-herzegovina.

4.2.5. Role of Roma communities and civil society in the green transition

Roma communities and CSOs in BiH play a critical yet still under-recognised role in promoting inclusion, environmental awareness, and community-based resilience. Their engagement forms an essential bridge between policy frameworks and the everyday realities of marginalised groups. However, their influence on environmental and energy policy remains limited due to institutional fragmentation, insufficient resources, and the lack of mechanisms for structured participation in green initiatives.

Community engagement and representation

Roma organisations in BiH have developed significant experience in community mediation, advocacy, and social inclusion. Networks such as the **Roma Council of BiH, Kali Sara – Roma Information Centre**, and the **Roma Women's Network** represent key platforms for articulating Roma needs and monitoring government commitments under the **Action Plan for Roma Inclusion 2021–2025**.[90] Their work has traditionally focused on housing, education, employment, and human rights. Environmental issues, by contrast, have only recently begun to appear on their agendas, primarily through donor-funded projects linking social inclusion with waste management or energy efficiency.

Community-level Roma associations are also involved in awareness campaigns on hygiene, waste separation, and energy-saving practices, often implemented in cooperation with local schools or municipal departments. These activities, though small in scale, have demonstrated measurable improvements in environmental awareness and waste practices within settlements. Still, they remain fragmented and dependent on short-term funding.

Capacity and resources

Most Roma CSOs in BiH operate with limited administrative and financial capacity. Many lack permanent staff, dedicated office space, or core funding, relying instead on project-based grants from international donors or central level ministries. This restricts their ability to maintain continuity, particularly in technical areas such as environmental management, renewable energy, or climate adaptation.

While several organisations have trained mediators for education and health sectors, there are still **no Roma environmental mediators** or community facilitators specifically tasked with linking green policies to Roma neighbourhoods. Integrating environmental themes into existing mediation frameworks would be a cost-effective step to strengthen participation.

Despite these constraints, civil-society cooperation is improving. **The ROMACTED II programme**, jointly implemented by the Council of Europe and the EU, has built municipal-level cooperation between Roma representatives and local authorities. Some participating municipalities, including Tuzla, Kakanj, and Bijeljina, have used this cooperation to introduce environmental or green-job components into local action plans.[91]

Partnerships with institutions and donors

Roma CSOs maintain close cooperation with international partners, particularly **UNDP, GIZ**, and the **EU Delegation to BiH.** Through projects such as Green Recovery, EU4Energy Transition, and Inclusive **Waste Management**, civil-society actors have contributed to outreach and training components, helping to identify Roma beneficiaries for public-works and training schemes.[92] These partnerships have proven essential in bridging the information gap between communities and institutions.

At the same time, donor dependency remains a challenge. Once project cycles end, the established channels of cooperation often dissolve, highlighting the need for permanent coordination structures and budget funding mechanisms that would institutionalise Roma-CSO participation in environmental and climate governance.

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90 Ministry for Human Rights and Refugees of Bosnia and Herzegovina (MHRR), Action Plan for Roma Inclusion 2021–2025, Sarajevo, 2021, available at: https://mhrr.gov.ba.

91 Council of Europe and European Union, ROMACTED II: Promoting Good Governance and Roma Empowerment at Local Level – Country Factsheet Bosnia and Herzegovina, Strasbourg, 2023, available at: https://www.coe.int/en/web/romacted.

92 UNDP Bosnia and Herzegovina, Green Recovery Project Report 2024, Sarajevo, 2024, available at: https://www.undp.org/bosnia-herzegovina.

Opportunities for participation in green measures

The transition to a low-carbon economy offers new spaces for Roma participation, especially at local level. Roma CSOs could take part in:

- monitoring and awareness campaigns under municipal **LEAP** and **Sustainable Energy and Climate Action Plans;**
- implementation of **community-based waste collection and recycling initiatives;**
- participation in energy-poverty assessments and outreach for **energy efficiency** retrofits; and
- advocacy for inclusion of vulnerable groups in **Just Transition measures** in coal-dependent areas such as Tuzla and Banovići.

Strengthening Roma CSOs' environmental capacities, through training, small grants, and participation in donor co-ordination platforms, would not only increase social equity but also enhance the overall sustainability of BiH's green transition.

4.2.6. Measures, models and recommendations

This section summarises practical measures and pilot models designed to strengthen Roma participation in Bosnia and Herzegovina's green transition. The recommendations respond directly to the barriers and opportunities identified in previous sections and reflect research questions 12–16. They combine evidence-based policy guidance with operational pilot concepts that are feasible within the BiH's institutional, financial, and socio-economic context.

4.2.6.1. Summary of recommended measures

The following measures outline priority actions for aligning Roma inclusion with green transition policies and for building practical entry points into green sectors.

Policy and programme measures

- **Integrate Roma inclusion into climate and energy frameworks**. Link the Action Plan for Roma Inclusion 2021–2025 with the National Energy and Climate Plan and related environmental policies. Introduce Roma-targeted access windows, simplified eligibility criteria, and outreach through Roma mediators at the municipal level.

- **Introduce social-energy access mechanisms.** In central and entity-level energy-efficiency and renewable energy programmes, establish dedicated components that allow low-income Roma households, including those lacking formal tenure, to benefit from retrofitting and small-scale solar installations. To improve equitable access, municipalities should adjust their energy efficiency subsidy programmes, so that Roma and other vulnerable groups are effectively included. This could be achieved by introducing dedicated components for these populations or by establishing participation quotas within mainstream schemes.

- **Strengthen municipal inclusion in green delivery.** Municipalities should include Roma-sensitive measures within their LEAPs and SECAPs. Coordination between social, housing, and environmental departments should be institutionalised and supported through technical assistance.

- **Develop a joint Roma–climate monitoring framework.** Create shared indicators connecting Roma inclusion targets with National Energy and Climate Plan implementation to enable joint monitoring, evaluation, and reporting at state and entity levels.

Operational and skills measures

- **Formalise Roma roles in waste and circular economy services**, while first assessing the legal, infrastructural, and urban conditions necessary for formalisation. In many contexts, formalisation requires adequate living conditions, certification of skills, and registration with municipalities or operation under a legal entity. Based on regulations, Roma workers may be employed in waste sorting, collection, and recycling operations through municipal or public–private partnerships, integrated into public utility companies, organised through cooperatives or social enterprises, or registered as individual collectors. In all cases, ensure occupational-safety training, provision of protective equipment, and contracts that guarantee fair wages and safe working conditions.

- **Create short-cycle green-skills training pathways**. Develop modular training programmes in solar installation, energy retrofitting, and waste management, in collaboration with vocational training centres and local employers. Linking these training programmes to subsidised employment measures within the Operational Plan for Employment would help support Roma graduates to ease entry into green-sector jobs.

- **Support inclusive green entrepreneurship.** Provide micro-grants and mentoring to Roma entrepreneurs active in repair, reuse, and recycling services, fostering links with municipal utilities and private operators. If required, legislation should be improved to enable such interventions and ensure that green micro-entrepreneurship is supported through a wider social-economy framework, including tax incentives for workers in this sector and complementary grant schemes provided by the employment agency.

Cross-cutting enablers

- **Ensure gender- and youth-responsive design**. Adapt training schedules, provide childcare and transport allowances, and target NEET youth to increase women's and young people's participation.

- **Encourage regional learning**. Facilitate peer exchanges and comparative learning through Energy Community and Roma Integration platforms to promote replication of inclusive practices across the Western Balkans and Türkiye.

Expected economic, social, and environmental benefits

- **Economic:** Integrating Roma workers into formal waste and recycling chains enhances productivity, reduces informal labour, and stimulates local employment.

- **Social:** Regular contracts and improved safety standards reduce precarity and discrimination, supporting social stability.

- **Environmental:** Increased waste sorting and recycling efficiency directly contributes to National Energy and Climate Plan and Green Agenda targets on emissions reduction and resource efficiency.

4.2.6.2. Pilot models for implementation

The following pilot concepts translate the above measures into operational, scalable actions for testing and replication.

BOSNIA AND HERZEGOVINA - Pilot measures

Pilot 1	**"Social Energy Access":** Energy-Efficiency Retrofits for Vulnerable Roma Households

Objective:
Enable Roma households, including those without formal tenure, to participate in energy-efficiency retrofitting programmes under simplified eligibility criteria.

Target group:
Low-income Roma households in urban and peri-urban areas.

Delivery partners:
Line ministries, municipalities, energy-efficiency contractors, social welfare centres, Roma mediators.

Core activities:
Improve existing schemes at the central and municipal to ensure targeted lots for Roma or set the quotas for mandatory inclusion of Roma. Raise the awareness among the bank sector on the importance of inclusion of Roma. Train Roma CSO representatives to support outreach, applications and grievance handling while simplifying eligibility pathways for vulnerable families.

Indicative budget:
€350,000–€500,000 for 200–300 homes.

Key indicators:
• Number of homes renovated;
• proportion of informal-tenure households reached;
• energy savings achieved.

⚠️✅ **Risks & mitigation:**

Ownership disputes (attestations from social centres); quality control (third-party audits); low uptake (targeted communication).

Pilot 2	**"Green Skills Pathways":** Entry-Level Training and Job Placement in Renewable Energy and Energy Efficiency

Objective:
Establish short, accredited training programmes for Roma youth and low-qualified adults in green job sectors.

Target group:
Roma youth (18–30) and unemployed adults, with special focus on women and NEETs.

Delivery partners:
VET centres, energy and construction companies, public employment services, Roma CSOs.

Core activities:
Design 80–100-hour micro-modules; recognition of prior learning; internships; job placement and mentoring. Effective implementation requires employer engagement, including partial cost-sharing of trainings (approximately 20%), which helps secure private-sector buy-in and creates clearer routes into employment.

Indicative budget:
€250,000–€400,000 for 120–150 trainees.

Key indicators:
• Completion and certification rates;
• employment rate after six months;
• gender/youth participation ratio.

⚠️✅ **Risks & mitigation:**

Employer buy-in (co-designed modules); dropouts (stipends, mentoring); retention (monitoring and follow-up).

4.2.6.3. Monitoring, evaluation, and regional learning

To ensure these measures produce measurable and lasting outcomes, a shared monitoring and evaluation (M&E) framework is required.

- **Governance:** Data collection and validation should be coordinated by the MHRR (Roma inclusion) and MoFTER (climate/energy) in cooperation with entity ministries and local governments. Municipalities and implementing agencies should feed quarterly data into a central database managed by a National Energy and Climate Plan coordination unit.
- **Data architecture:** All implementing entities, including energy contractors, employment services, and municipalities, should use harmonised templates for collecting participation and outcome data disaggregated by sex, age, and ethnicity, respecting data protection standards.

4.3. Kosovo*

KOSOVO*
Beneficiary's dashboard

1. Spatial pattern of Roma settlements

Roma, Ashkali and Egyptian communities are concentrated in and around towns such as Fushë Kosovë/Kosovo Polje, Ferizaj/Uroševac, Pejë/Peć, Mitrovicë/Mitrovica, Prizren and Gjakovë/Đakovica, often in disadvantaged urban and peri-urban areas close to industrial or waste sites.

Near industrial and waste sites

High environmental vulnerability

2. Key numbers panel

Population (RAE):

~35,800 official; **50,000–60,000** estimated

Employment:
Very low formal employment

Work pattern:
Strong reliance on **informal waste and casual labour**

Economic loss of exclusion:
Not quantified

3. Policy snapshot box

Roma inclusion plan: Yes – 2022–2026

Green / NECP: Energy & Climate Plan under preparation

Explicit Roma–green link: No

4. Challenges and opportunities

Main barriers:

- environmental exposure;
- high informality;
- no Roma-sensitive access mechanisms

Main opportunities:

- experience in waste collection/sorting;
- NECP window for Roma inclusion

Flagship initiatives:

- green skills & jobs for RAE youth;
- community green micro-projects

4.3.1. Overview of Roma population and Roma inclusion and green transition policy context

Roma, Ashkali, and Egyptian communities in Kosovo* form one of the most socio-economically disadvantaged population groups. Although the 2011 census recorded around 35,800 persons belonging to these communities, independent estimates by international organisations suggest that the real number is closer to 50,000–60,000 individuals, representing approximately 3% of the total population.[93] The majority reside in municipalities such as Fushë Kosovë/Kosovo Polje, Ferizaj/Uroševac, Pejë/Peć, Mitrovicë/Mitrovica, Prizren, and Gjakovë/Đakovica. A large proportion live in informal or substandard settlements, often segregated and located near industrial zones or areas exposed to environmental hazards.

Socio-economic indicators show persistent exclusion. Employment rates among Roma, Ashkali, and Egyptians remain significantly below the Kosovo* average, particularly for women and youth. Many rely on informal work in waste collection, seasonal labour, and low-paid service jobs. Education outcomes are similarly low: primary school attendance has improved, but upper-secondary and tertiary completion rates remain minimal. These disparities are reinforced by limited access to social protection, health services, and housing infrastructure. As a result, many households face multidimensional poverty and high vulnerability to environmental and economic shocks.

Linking Roma inclusion and the green transition

Roma communities in Kosovo* have long been active in informal environmental work, particularly in waste collection and materials recovery. Their experience positions them as potential contributors to the green transition if formal pathways and safeguards are established. At present, however, the two policy domains, Roma inclusion and environmental sustainability, remain largely parallel. Inclusion strategies prioritise social protection and employment, while green strategies focus on infrastructure, energy security, and environmental compliance.

Bridging these agendas requires institutional cooperation between the Office for Good Governance (OGG) and the **Ministry of Environment, Spatial Planning and Infrastructure** (MESPI), integration of Roma-sensitive indicators in climate and energy policies, and local level mechanisms that enable Roma mediators to participate in planning and monitoring. The ongoing preparation of the Energy and Climate Plan and the expansion of municipal waste management and energy efficiency schemes provide practical opportunities to embed social inclusion measures and demonstrate tangible benefits for marginalised communities.

This overall context forms the foundation for the analysis presented in the following sections, which explore institutional frameworks, barriers, and opportunities for aligning Roma inclusion with the green transition agenda in Kosovo*.

4.3.2. Policy and institutional framework for Roma inclusion and green transition

Kosovo* has established a broad policy framework that addresses both social inclusion and environmental sustainability, yet the two domains remain institutionally separate. Roma, Ashkali, and Egyptian inclusion policies are well developed, while the green transition framework is advancing through energy and climate reforms supported by international partners. However, limited coordination between the two areas constrains opportunities to embed social and equity dimensions into green policies and programmes.

Institutional framework for Roma inclusion

Roma inclusion in Kosovo* is led by the **Office of the Prime Minister** through its **OGG**, which coordinates the implementation of the **Strategy for the Inclusion of Roma and Ashkali Communities 2022–2026**. The strategy is structured around five pillars, which relate to education, employment, health, housing, and civil registration, and explicitly integrates gender equality, youth participation, and human rights standards. A coordination body ensures cross-ministerial dialogue, while municipal action plans operationalise measures locally.

Implementation responsibilities are distributed among line ministries: the **Ministry of Finance, Labour and Transfers** oversees employment and social protection, the **Ministry of Education, Science, Technology and Innovation** manages education components, and the **MESPI** contributes to housing and settlement-related measures. Munici-

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93   OSCE Mission in Kosovo*, Community Rights Assessment Report 2023, Pristina, 2023, available at: https://www.osce.org/mission-in-kosovo.

palities implement local activities, often supported by donor-funded technical assistance.

Interviewed institutional stakeholders confirmed that although coordination mechanisms formally exist, operational integration is inconsistent. Municipal officers often rely on donor funding and mediators to ensure participation of Roma and Ashkali households. **Roma coordinators** and **community mediators** play a vital role in connecting institutions and communities, yet their positions are frequently project-based and lack sustainable financing.

Civil-society organisations (CSOs) are also key actors. Networks such as **Voice of Roma, Ashkali and Egyptians, Roma Versitas Kosovo***, and the **Roma Women's Initiative** support advocacy, education, and empowerment. These organisations regularly collaborate with OGG, the Ministry of Finance, Labour and Transfers, and municipalities on implementation, but they rarely participate in policy formulation related to environmental or green agendas. Interviewed CSOs emphasised that inclusion efforts remain concentrated in traditional social sectors, while environment and climate change are seen as "technical areas" outside the Roma inclusion framework.

Institutional framework for the green transition

The **green transition agenda** in Kosovo* is guided by the **Energy Strategy 2022–2031**, the **Climate Change Strategy and Action Plan 2022–2030**, and the forthcoming **Energy and Climate Plan**[94]. Institutional responsibility lies primarily with the **Ministry of Economy** for energy and the **Ministry of Environment, Spatial Planning and Infrastructure (MESPI)** for environment and climate policy. These ministries coordinate with the **Energy Regulatory Office, Kosovo* Energy Efficiency Agency**, and **Hydrometeorological Institute**, as well as with municipal departments responsible for local environmental management.

The strategic framework emphasises renewable energy (especially solar and wind), energy efficiency, waste management, and decarbonisation of heating and industry. However, **social inclusion is not systematically integrated** in any of these frameworks. Roma, Ashkali, and Egyptian communities are not explicitly mentioned as target groups in either the Energy Strategy or the Climate Change Strategy. Interviewed environmental stakeholders acknowledged that vulnerable communities are "implicitly" covered through general poverty-reduction or housing programmes but not as named beneficiaries of green measures.

Donor-supported initiatives, including **UNDP's Clean Energy Transition Project, GIZ's Green Economy Programme,** and **EU's Economic and Investment Plan (EIP) flagship projects**, have introduced environmental awareness and training components. Some of these have reached Roma and Ashkali communities indirectly—particularly through waste management, recycling, and public-works employment schemes—but the impact remains small-scale and fragmented.[95]

At the local level, municipalities are required to adopt **LEAPs** and, where applicable, **SECAPs**. A review of these documents indicates that few contain explicit social or Roma-related measures. Municipalities with high Roma or Ashkali populations, such as Fushë Kosovë/Kosovo Polje, Mitrovicë/Mitrovica, and Gjakovë/Đakovica, have initiated local projects on waste collection and settlement rehabilitation, yet without formal linkage to green transition objectives.

Coordination between inclusion and green transition frameworks

Coordination between Roma inclusion and environmental institutions remains limited. The OGG and MESPI have no formal mechanisms for joint programming or monitoring. Cooperation occurred mostly through project-based arrangements, such as **ROMACTED II,** which facilitated dialogue between Roma representatives and municipal authorities, occasionally addressing environmental or urban-planning issues.[96] Similarly, **UNDP's Green Recovery Project** has included components aimed at vulnerable groups but without systematic integration into Kosovo* Roma strategies.

Interviewed government representatives confirmed that policy frameworks operate in parallel rather than intersecting: Roma inclusion is treated under social policy, while environmental and climate policy fall under economic and infrastructure portfolios. The absence of shared indicators or reporting templates prevents data alignment between OGG's Roma database and MESPI's environmental performance system.

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94 Ministry of Economy, Energy Strategy 2022–2031, Pristina, 2022, available at: https://kryeministri.rks-gov.net.
95 UNDP Kosovo*, Clean Energy Transition Project Overview 2023, Pristina, 2023, available at: https://www.undp.org/kosovo.
96 Council of Europe and European Union, ROMACTED II: Promoting Good Governance and Roma Empowerment at Local Level – Kosovo* Factsheet, Strasbourg, 2023, available at: https://www.coe.int/en/web/romacted.

Despite these constraints, opportunities for institutional alignment are emerging. The preparation of the **Energy and Climate Plan** provides an entry point for mainstreaming social inclusion criteria, particularly in energy efficiency and renewable energy access programmes. The **Employment Agency of Kosovo***, in collaboration with the Ministry of Finance, Labour and Transfers and international partners, could integrate Roma-sensitive targeting within green-job and vocational training measures. Furthermore, **municipal LEAP updates** present a local level opportunity to embed Roma mediators and coordinators in environmental governance structures.

Challenges and emerging opportunities

The dual structure of governance in Kosovo*, with inclusion led by OGG and environmental policy led by MESPI, creates fragmentation in planning and monitoring. Limited administrative capacity, especially at the municipal level, further restricts implementation of integrated measures. Interviewed practitioners from both sectors noted that there is **no shared understanding** of how Roma inclusion could contribute to environmental objectives. Additionally, donor dependency and short project cycles impede long-term sustainability.

Nonetheless, there is growing recognition among institutions and partners that inclusion and sustainability are mutually reinforcing. The new **Employment and Social Policy Strategy 2022–2026** includes "green and digital transitions" as cross-cutting themes and explicitly calls for targeted employment support for vulnerable groups, including Roma and Ashkali. Likewise, donor coordination platforms under the **Energy Community Secretariat** have begun discussing "Just Transition" principles applicable to Kosovo*, opening room for dialogue on equitable participation in decarbonisation efforts.[97]

If institutional cooperation between OGG, MESPI, and the Ministry of Finance, Labour and Transfers is strengthened, and if Roma mediators are systematically involved in energy- and environment-related programmes, Kosovo* could demonstrate a practical model of socially inclusive green transition in the Western Balkans.

4.3.3. Barriers and access to green opportunities

This section examines the main structural, socio-economic, and institutional barriers affecting Roma, Ashkali, and Egyptian participation in Kosovo*'s emerging green transition, as well as potential enabling factors. The analysis identifies the points at which exclusion occurs and highlights possible entry pathways into new environmental and energy sectors.

Structural and socio-economic barriers

Roma, Ashkali, and Egyptian communities in Kosovo* continue to face deep socio-economic exclusion and spatial marginalisation. Many households live in informal settlements or inadequate housing, often near waste dumps, industrial zones, or flood-prone areas. These locations expose families to environmental risks but simultaneously exclude them from eligibility for energy efficiency and housing-improvement schemes that require legal property titles.

Interviewed stakeholders confirmed that **energy-retrofit and renewable energy programmes exclude informal households** because eligibility criteria demand proof of ownership or registered addresses. While such conditions are administratively standard, they unintentionally disqualify large portions of Roma and Ashkali families, many of whom lack updated documentation after displacement or informal reconstruction.

Municipalities rarely include Roma settlements in local environmental or energy plans. Local officials explained that budget constraints and the absence of Roma mediators limit outreach and participation. Even when municipalities publish open calls for training or grants, Roma households typically do not apply due to information barriers, distrust, or perceived administrative complexity.

Access to infrastructure is another major barrier. Many settlements still lack stable water, sanitation, and electricity connections, which restricts participation in energy efficiency or waste management projects. Without basic services and formal addresses, Roma communities remain outside most green transition investment schemes.

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97 Energy Community Secretariat, Just Transition and Social Dimensions of the Energy Transition in the Western Balkans, Vienna, 2023, available at: https://www.energy-community.org.

Education, skills, and employment challenges

Low education levels and limited access to vocational training restrict Roma, Ashkali, and Egyptian participation in emerging green labour markets. According to the Employment Agency of Kosovo*, school attendance has improved, but early school leaving and low completion rates remain prevalent, especially among young women. As a result, Roma youth are overrepresented among NEETs (not in employment, education, or training).

Interviewees emphasised that most Roma jobseekers lack formal qualifications, even though they possess informal experience in construction, recycling, and maintenance. Without recognition of prior learning mechanisms, this experience cannot translate into certified skills required for employment in energy efficiency, solar installation, or waste recycling sectors.

Public vocational training centres provide short courses in technical areas such as plumbing, electrical installation, and building insulation. However, these centres rarely implement targeted outreach or stipends that would make participation accessible for Roma and Ashkali learners. Stakeholders noted that existing green-skills programmes, for example those supported by **UNDP** and **GIZ**, reach only a few Roma participants, largely because selection criteria and information channels are not adapted to vulnerable groups.[98]

Interviewed Roma CSOs pointed out that **mobility, childcare responsibilities, and social stigma** further reduce the participation of Roma women in training and employment. Many women prefer local, flexible, and community-based learning formats. Without tailored incentives and support (transport, meals, stipends), training completion and job retention rates remain low.

Institutional and administrative barriers

Coordination between inclusion and environmental institutions remains weak. Roma, Ashkali, and Egyptian inclusion falls under the **Office of the Prime Minister**, while environmental and energy issues are managed by **MESPI** and **Ministry of Economy**. Interviewed government representatives confirmed that there is **no joint mechanism** linking Roma inclusion with green transition measures. Municipal social departments and environmental offices often operate separately, and data systems are not aligned.

Administrative rigidity also excludes Roma applicants from participation in public schemes. Requirements for formal residence, official identification, and co-financing contributions are standard in energy and infrastructure projects but disproportionately disadvantage poor and undocumented households. At the same time, most municipalities lack Roma coordinators with sufficient authority to influence environmental or urban-planning decisions.

Interviewed CSOs underlined that institutional fragmentation is compounded by short donor project cycles. Once projects end, coordination platforms dissolve, and lessons are rarely integrated into permanent government programmes. Donor dependency and turnover of staff in local institutions further reduce continuity.

Emerging green sectors and opportunities

Despite persistent barriers, several sectors show potential for Roma and Ashkali inclusion. Kosovo*'s **Energy Strategy 2022–2031** and the forthcoming **Energy and Climate Plan** anticipate growth in renewable energy, energy efficiency, and circular economy — areas that create new opportunities for semi-skilled and low-skilled labour.[99]

The **construction and energy efficiency sector** offers immediate potential for Roma participation. Many Roma and Ashkali men already work informally in building repair and renovation, providing a basis for short-cycle training and certification in insulation, painting, or minor retrofitting. Programmes such as **Clean Energy Transition Kosovo*** and **EU4Energy Transition** could incorporate Roma-sensitive quotas and community-based training modules.

The **waste and recycling sector** also presents an entry point. Roma communities have long experience in waste collection and materials recovery, which can be formalised through municipal or public–private waste management schemes. Initiatives piloted in Prizren, Gjakovë/Đakovica, and Mitrovicë/Mitrovica have shown that employing Roma workers in waste sorting and materials recovery facilities improves efficiency and community relations.[100]

98 UNDP Kosovo*, Skills for Sustainable Employment – Project Evaluation Report 2023, Pristina, 2023, available at: https://www.undp.org/kosovo.
99 Ministry of Economy, Energy Strategy 2022–2031, Pristina, 2022, available at: https://kryeministri.rks-gov.net.
100 GIZ Kosovo*, Inclusive Waste Management Pilot Projects: Lessons Learned, Pristina, 2023, available at: https://www.giz.de.

In **agriculture and agro-processing**, particularly in southern and western municipalities, short-term seasonal employment can integrate environmental components, such as organic waste management or energy-efficient production. These opportunities require partnerships between agricultural cooperatives, local employment services, and Roma CSOs.

Private-sector stakeholders interviewed highlighted that **basic work discipline, safety training, and mentoring** are more decisive for employability than formal education. Modular short courses linked directly to employer demand could therefore provide rapid access to entry-level green jobs.

Gender and generational dimensions

Gender and youth factors significantly shape access to green opportunities. Roma and Ashkali women face multiple disadvantages: low education, domestic responsibilities, restricted mobility, and limited awareness of available programmes. Employment-service representatives noted that women's participation in training remains below 20% even in inclusive projects.

Adapting programmes to women's needs (flexible schedules, local venues, and stipends for transport or childcare) has proven effective where implemented. Projects supported by **UNDP** and **the Ministry of Finance, Labour and Transfers** in selected municipalities demonstrated that such measures increase women's participation rates and completion outcomes.[101]

For youth, the lack of career guidance and poor access to internships are major barriers. The Employment Agency's youth programmes are primarily focused on digital and general skills rather than green sectors. Developing "green youth corridors" through partnerships with VET schools and employers could create more accessible pathways for Roma and Ashkali youth.

Information, motivation, and trust barriers

Lack of information remains one of the most persistent obstacles. Roma and Ashkali households are rarely aware of available training, grants, or employment programmes. Information dissemination relies heavily on digital platforms or municipal noticeboards, which do not reach communities with limited internet access or literacy. Interviewed mediators stressed that **personal outreach and mediator networks are crucial** for building trust and ensuring that vulnerable households apply.

Trust between communities and institutions also remains fragile. Previous experiences with short-lived or poorly communicated projects have led to scepticism. Without visible results and consistent communication, Roma and Ashkali communities are reluctant to participate in new schemes. Transparent procedures, feedback mechanisms, and mediator involvement at every stage are essential for rebuilding confidence.

4.3.4. Opportunities and gaps

Kosovo* is entering a phase in which both Roma inclusion and the green transition are high on the policy agenda, yet they remain conceptually and institutionally disconnected. While opportunities for convergence exist, especially in employment, energy efficiency, and waste management, these have not yet been operationalised into coherent programmes. The following analysis outlines the most relevant institutional, policy, and practical opportunities, as well as the key gaps preventing inclusive green transformation.

Institutional and policy opportunities

The alignment between Kosovo*'s **Energy Strategy 2022–2031** and the **Strategy for the Inclusion of Roma and Ashkali Communities 2022–2026** offers a unique institutional opening. Both frameworks emphasise social welfare, employment, and sustainable development. As new policy instruments, particularly the **Energy and Climate Plan** and the **Employment and Social Policy Strategy 2022–2026**, are being finalised, there is potential to embed Roma inclusion within climate and energy measures.[102]

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101 Ministry of Finance, Labour and Transfers, Employment and Social Policy Strategy 2022–2026, Pristina, 2022, available at: https://mf.rks-gov.net.
102 Ministry of Economy, Energy Strategy 2022–2031, Pristina, 2022, available at: https://kryeministri.rks-gov.net.

Interviewed stakeholders from the Office for Good Governance and the Ministry of Economy highlighted that **cross-sectoral working groups** under the Energy and Climate Plan preparation could be expanded to include representatives from Roma coordination offices and local mediators. This would allow practical issues, such as informal housing, energy poverty, and access to subsidies, to be addressed from both social and environmental perspectives.

The institutional design of Kosovo*'s governance provides an additional opportunity: the OGG, which leads Roma inclusion, reports directly to the Office of the Prime Minister. This facilitates inter-ministerial dialogue and top-level endorsement of cross-cutting priorities. Establishing a **joint coordination mechanism between OGG, MESPI, and the Ministry of Finance, Labour and Transfers** could enable systematic monitoring of how vulnerable groups participate in green transition measures.

Local level and donor-driven opportunities

At the municipal level, the combination of **LEAPs** and **Municipal Action Plans for Roma Inclusion** provides a basis for integration. Municipalities such as Fushë Kosovë/Kosovo Polje, Prizren, and Gjakovë/Đakovica have already established Roma coordinator positions and community mediators supported through **ROMACTED II** and **UNDP's Green Recovery** projects. Expanding these arrangements to include environmental and waste management components would create tangible entry points for Roma communities in local green initiatives.[103]

Interviewed municipal officers emphasised that donor-funded projects often serve as the only operational bridge between environmental and social agendas. Programmes supported by **GIZ, UNDP**, and the **EU's EIP** have introduced pilot models for energy efficiency, local employment, and social inclusion. However, their limited duration and fragmented coverage hinder sustainability once donor funding ends.

Scaling up successful pilots, such as municipal waste-collection cooperatives involving Roma workers or small-scale energy-retrofit schemes targeting low-income households, would allow municipalities to demonstrate inclusive approaches and attract additional investment. Establishing a dedicated funding window for inclusive green initiatives within the **Ministry of Local Government Administration** could institutionalise such practices.

Private-sector engagement and green entrepreneurship

The private sector represents an underutilised but promising vector for Roma inclusion in green growth. Kosovo*'s Small and Medium-sized Enterprises (SMEs) structure is dominated by small construction, service, and repair firms that already participate in energy efficiency retrofits and renewable installations. These firms often employ informal labour, including Roma workers, but without formal contracts or safety standards.

Interviewed business associations and chambers confirmed that **labour shortages in energy efficiency and construction sectors** are acute, opening an opportunity for targeted Roma training and placement schemes. **Linking Roma mediators and local employment offices with SME networks** could facilitate the transition from informal to formal employment, particularly in retrofitting, recycling, and repair services.

Moreover, emerging donor-supported incubators, such as those under **Innovation Centre Kosovo* (ICK)** and **GIZ's Green Entrepreneurship Programme**, can support Roma micro-entrepreneurs engaged in repair, reuse, or recycling activities. These initiatives could be expanded to provide small grants, equipment, and mentoring to Roma women and youth entrepreneurs, formalising their contribution to circular economy value chains.[104]

Cross-sectoral coordination gaps

Despite these opportunities, several systemic gaps persist. First, **data fragmentation** remains a major constraint. Roma-related data are collected under social inclusion frameworks but not linked with environmental or energy indicators. MESPI and Ministry of Economy lack disaggregated monitoring systems that would allow tracking of vulnerable groups' participation in green programmes.

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103 Council of Europe and European Union, ROMACTED II: Promoting Good Governance and Roma Empowerment at Local Level – Kosovo* Factsheet, Strasbourg, 2023, available at: https://www.coe.int/en/web/romacted.

104 GIZ Kosovo*, Green Entrepreneurship Programme 2023 Overview, Pristina, 2023, available at: https://www.giz.de.

Second, **funding fragmentation** leads to inefficiency. Roma inclusion and green transition programmes are financed through separate budget lines and donor instruments, with no joint programming or reporting. Consequently, even when projects overlap geographically, they rarely share objectives or indicators.

Third, there is **limited institutional awareness** of the potential synergies between inclusion and environmental policy. Interviewed officials from both sectors described the other domain as "outside their mandate," illustrating the persistence of vertical administrative silos. Without cross-sectoral training or inter-ministerial working groups, opportunities for integration remain missed.

Finally, at the operational level, Roma mediators and coordinators lack exposure to environmental topics. Including environmental awareness and basic green-skills modules in their training could strengthen their ability to advocate for inclusive measures at the community level.

4.3.5. Role of Roma communities and civil society in the green transition

Current role of Roma CSOs and community actors in shaping the green transition

Roma, Ashkali, and Egyptian organisations in Kosovo* are beginning to engage with environmental and green transition issues, though their participation remains largely project-based and fragmented. Their activities are usually anchored in broader inclusion, human rights, or employment programmes rather than dedicated environmental agendas. Organisations such as **Voice of Roma, Ashkali and Egyptians, Roma Versitas Kosovo*,** and the **Roma Women's Initiative** have implemented small-scale projects focused on community development, skills training, and awareness raising.

Several of these initiatives have indirectly supported environmental goals. For example, community clean-up campaigns and waste management awareness activities have been organised under donor-funded local governance or social-cohesion projects. Interviewed CSO representatives underlined that these activities often rely on volunteerism and short-term grants, which limits continuity and institutional learning.

Stakeholders from **UNDP Green Recovery** programmes highlighted that Roma mediators and CSOs are essential to local outreach: they build trust, translate technical information into accessible formats, and mobilise participation in training or municipal schemes. Without such intermediaries, Roma households often remain unaware of opportunities or distrust formal institutions. The absence of structured cooperation frameworks between Roma CSOs and environmental authorities therefore represents a missed opportunity for inclusive implementation.[105]

Awareness, education, and engagement

Awareness and education are emerging as critical entry points for Roma participation in Kosovo*'s green transition. CSOs have started introducing environmental themes into their youth and women's empowerment activities. Examples include community workshops on recycling, energy saving, and sustainable consumption conducted in partnership with local schools or municipal environmental offices. These actions demonstrate potential for scaling, especially if supported by long-term funding and technical mentoring.

Interviewed educators and mediators noted that Roma youth show interest in environmental topics when linked to tangible income or learning opportunities. Integrating green-skills components into non-formal education and vocational programmes, such as short courses on waste sorting, basic electrical work, or energy-efficient construction, could connect awareness with employability. Women's associations have also begun to explore topics such as urban gardening, hygiene, and resource management, which could evolve into small-scale social-enterprise models if accompanied by micro-grants and local market access.

Partnerships between Roma CSOs and mainstream environmental organisations are still rare. Interviewed practitioners suggested that capacity-building programmes, similar to Albania's **Support for Roma Green Micro-entrepreneurs**[106] or Serbia's **ODNESI** initiatives, could be replicated in Kosovo*, helping Roma organisations develop pro-

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105 Council of Europe and European Union, ROMACTED II: Promoting Good Governance and Roma Empowerment at Local Level – Kosovo* Factsheet, Strasbourg, 2023, available at: https://www.coe.int/en/web/romacted.

106 https://irca.al/2024/06/01/project-title-supporting-roma-micro-entrepreneurs-in-albania-towards-better-environmental-sustainability/.

ject-writing, fundraising, and technical competencies to participate in environmental policy processes.[107]

Community perspectives and aspirations

Field insights show that Roma, Ashkali, and Egyptian communities associate "green work" primarily with practical, low-barrier activities such as waste collection, cleaning services, and small-scale repair or recycling. These are viewed as familiar, attainable livelihoods that could be formalised through contracts and safety standards. Interviewed community representatives repeatedly expressed the need for **formal recognition and safe working conditions,** particularly for waste collectors who currently operate in precarious environments without social protection.

Community aspirations also include broader livelihood stability and visibility within municipal systems. Many respondents indicated willingness to participate in local environmental projects if compensation, protective equipment, and fair working conditions were ensured. For Roma women and youth, priorities centre on **short, local, and paid learning opportunities**, such as community clean-ups, municipal planting campaigns, or energy efficiency awareness drives that combine skill development with immediate income.

Roma CSOs have the potential to bridge these aspirations with Kosovo* green policies by acting as intermediaries between communities and institutions. However, they need predictable funding, technical mentorship, and access to decision-making platforms. Interviewed Roma leaders emphasised that without **systematic inclusion in municipal and planning structures**, participation remains symbolic rather than transformative.

4.3.6. Measures, models and recommendations

This section outlines practical measures and pilot models designed to strengthen Roma, Ashkali, and Egyptian participation in Kosovo*'s green transition. The recommendations address the barriers and opportunities identified in previous sections and provide feasible, context-specific entry points that combine policy alignment, municipal delivery, and community participation.

4.3.6.1. Summary of recommended measures

Policy and programme measures

- **Integrate social inclusion into green transition policies**. Ensure that the Strategy for Inclusion of Roma and Ashkali Communities (2022–2026) is linked to the forthcoming Energy and Climate Plan, Energy Strategy (2022–2031), and Climate Change Action Plan (2022–2030). The integration should introduce specific Roma-sensitive indicators and access windows for low-income and informal households.

- **Establish joint coordination between social and environmental authorities.** Create an inter-ministerial coordination platform between the Office for Good Governance (OGG), the Ministry of Environment, Spatial Planning and Infrastructure (MESPI), the Ministry of Economy, and the Ministry of Finance, Labour and Transfers to align inclusion and green agendas.

- **Enable access for informal households to energy and housing programmes.** Simplify eligibility criteria under energy efficiency and housing retrofitting schemes by accepting alternative documentation, community verification, and social safeguards for households without formal tenure. Energy efficiency support schemes at all levels should be designed to ensure meaningful access for Roma and other vulnerable groups. This may involve creating dedicated measures for these populations or integrating quota-based mechanisms within universal programmes to guarantee their inclusion.

- **Strengthen municipal delivery and Roma participation.** Integrate Roma mediators into LEAPs and SECAPs. Build the capacity of municipal staff to include Roma-sensitive measures in green projects and track participation.

- **Promote data integration and transparency.** Align Roma inclusion and green transition monitoring systems under OGG and MESPI to ensure consistent tracking of Roma participation in energy, waste, and environmental programmes.

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107 GIZ Kosovo*, Green Economy and Civil Society Support Programme, Pristina, 2023, available at: https://www.giz.de.

Operational and skills measures

- **Formalise Roma roles in circular economy and waste services** subject to an assessment of whether living conditions and basic urban infrastructure in Roma settlements allow for formalisation. In many economies this requires skills certification and registration with the municipality or operating under a legal entity. Based on regulations, formalisation can take three forms: integration into public utility companies, inclusion in cooperatives or social enterprises, or individual registration as certified waste collectors. Municipal and private-sector partnerships can support these pathways and should ensure protective equipment and occupational-safety training.

- **Develop short, modular green-skills pathways**. Collaborate with public VET centres and employers to design entry-level courses in solar photovoltaic installation, energy-efficient construction, and waste management, with recognition of prior learning and stipends for participants. By connecting these trainings with subsidised employment schemes under the Operational Plan for Employment, Roma will be able to move more easily into jobs in the green sector.

- **Encourage inclusive green entrepreneurship.** Support Roma micro-entrepreneurs engaged in repair, reuse, recycling, and environmental services through micro-grants, mentoring, and formal links to municipal and private value chains. Strengthening this measure may require assessing the legal framework and expanding instruments that support the social economy, such as tax relief for green-sector workers and dedicated employment service grant programmes.

Cross-cutting enablers

- **Ensure gender and youth responsiveness.** Provide flexible training schedules, stipends, safe transport, and childcare support to increase participation of Roma women and NEET youth in green programmes.
- **Leverage donor coordination platforms.** Use existing mechanisms under the EU, GIZ, and UNDP to scale up successful inclusion models and align funding for Roma-related green initiatives.
- **Foster regional peer learning.** Through the Energy Community and Roma Integration frameworks, facilitate knowledge exchange on inclusive green transition models across the Western Balkans and Türkiye.

4.3.6.2. Pilot models for implementation

The following pilot concepts operationalise the above measures and offer practical, scalable approaches for implementation in Kosovo*.

KOSOVO* - Pilot measures

Pilot 1	**"Formal Pathways to Green Jobs":** Building Skills and Employment of Roma in Energy-Efficiency and Recycling Sectors

Objective:
Enable Roma, Ashkali, and Egyptian jobseekers to acquire certified skills and employment in green sectors such as construction retrofitting, solar installation, and waste management.

Target group:
Roma and Ashkali youth (18–29) and low-qualified adults, prioritising women and NEETs.

Delivery partners:
The Ministry of Finance, Labour and Transfers, Employment Agency of Kosovo*, municipal VET centres, private contractors, and Roma CSOs.

Core activities:
Design short modular courses (80–120 hours), implement recognition of prior learning, provide work placements, and link participants to employers.

Indicative budget:
€250,000–€350,000 for 120–150 participants.

Key indicators:
• Number of certified trainees,
• job placements, retention after 6 months,
• share of women/youth.

⚠ ✅ **Risks and mitigation:**

Low uptake (incentives and outreach), employer reluctance (bonuses, public recognition), and dropout (stipends, flexible scheduling).

Pilot 2	"Youth for Green Communities": Roma Youth Engagement in Local Green Economy

Objective:
Engage Roma youth in applied green-skills learning and entry-level experience in local green economy sectors (e.g. circular economy, renewable energy sources/energy efficiency support roles, and modern/sustainable agriculture). .

Target group:
Roma and Ashkali youth aged 16–24, particularly early school leavers.

Delivery partners:
Municipalities, VET centres, green-sector enterprises (renewable-energy/ energy efficiency firms, recycling and repair businesses), agricultural cooperatives/agro-processors, youth CSOs, and donor programmes.

Core activities:
Short, modular green-skills courses; internships in local green enterprises (recycling and reuse workshops, energy efficiency /renewable energy sources companies, agro-processing plants, agri-cooperatives). youth-led micro-projects such as school or community gardens, small repair/reuse hubs, or simple energy-saving campaigns, linked to host enterprises or municipalities.

Indicative budget:
€150,000–€220,000 for 100–150 participants.

Key indicators:
• Number of youth involved, internships/placements realised;
• number of green enterprises/cooperatives hosting youth.

Risks and mitigation:

Dropout (mentoring, local supervision), limited employer interest (co-design curricula with enterprises, offer recognition, small incentives, or wage subsidies), limited visibility (media campaigns).

4.3.6.3. Monitoring, evaluation, and regional learning

To ensure sustainability and measurable results, an integrated monitoring and evaluation (M&E) framework should accompany all measures and pilots. The framework should focus on four key dimensions:

1. **Governance and roles:** Define clear institutional responsibilities for data collection, validation, and reporting among OGG, MESPI, the Ministry of Finance, Labour and Transfers, municipalities, and Roma focal points.

2. **Data architecture:** Establish shared indicators on Roma participation across programmes, disaggregated by gender, age, and location.

3. **Cadence and reporting:** Produce quarterly operational dashboards and annual synthesis reports integrating Roma inclusion and green transition metrics.

4. **Learning and accountability:** Use regional platforms such as the Energy Community and the Roma Integration – Phase III Programme to share lessons, benchmark progress, and identify replicable models.

4.4. Montenegro

MONTENEGRO
Beneficiary's dashboard

1. Spatial pattern of Roma settlements

Roma and Egyptians are mainly located in urban and peri-urban zones (Podgorica, Nikšić, Bar), often in informal or overcrowded settlements with poor access to services and infrastructure.

High overcrowding and informal housing

2. Key numbers panel

Population:
Small minority; data mainly qualitative

Socio-economic profile:
Low education; weak labour market access

Work pattern:
Informal and low-paid labour dominant

Economic loss of exclusion:
€25.5–61.4m productivity +
€5.65–13.56m fiscal (annual)

3. Policy snapshot box

Roma inclusion plan: Yes – Roma & Egyptians strategies

Green / NECP: NECP under development / implementation

Explicit Roma–green link: Emerging / Weak

4. Challenges and opportunities

Main barriers:

- limited circular-economy markets;
- weak Roma monitoring in green programmes

Main opportunities:

- expanding EE renovations;
- regional policy learning platforms

Flagship initiatives:

- inclusive EE retrofit / social-energy pilots

4.4.1. Overview of Roma population and Roma inclusion and green transition policy context

This subsection provides an overview of Roma and Egyptians in Montenegro, highlighting demographic characteristics, socio-economic conditions, and key challenges in accessing education, employment, housing and public services. It also sets the broader context for inclusion and the green transition, noting the main strategies and commitments that shape how Roma participation could be enabled in practice. Taken together, the overview situates the Beneficiary-specific analysis within both the population realities and the policy environment that frames Roma participation in Montenegro's green transition.

Population and spatial distribution. Official administrative estimates suggest around 6,500–7,000 Roma and Egyptians live in Montenegro (around 1.1% of the population), though independent sources place the number closer to 20,000 when accounting for undercounting and mobility patterns.[108] The largest concentrations are in Podgorica, Nikšić, Berane, Bijelo Polje and Ulcinj, with smaller communities in coastal municipalities. Settlement patterns include formal neighbourhoods as well as substandard or informal areas on the peripheries of urban zones or near industrial sites, which increases exposure to environmental risks and limits eligibility for programmes that require legal tenure or documentation.[109]

Poverty and informality remain persistent. Many Roma households rely on irregular earnings in construction, street services, secondary raw materials collection, and seasonal labour, often combined with social transfers.[110] Women and youth are the most excluded groups, facing limited access to formal employment and vocational training. Education outcomes improve at the primary level but drop sharply in upper-secondary and tertiary cycles, feeding a high share of NEETs among Roma youth. These vulnerabilities are compounded by energy poverty (inefficient heating, poor insulation, and limited access to retrofit schemes) which heightens exposure to price shocks and extreme weather.[111]

Montenegro is projected to experience a **28.5% decline in its workforce** by 2050, generating an annual need for nearly **19,500 new workers**. With an estimated 20,000 Roma citizens, the Montenegro faces both a demographic challenge and an opportunity: **78% of Roma youth are not in employment or education,** indicating a large pool of untapped labour potential. The economic costs of this exclusion are substantial. Montenegro forfeits an estimated **€25.5–€61.4 million in productivity every year,** together with **€5.65–€13.56 million in fiscal revenues** that could otherwise support public services and development.[112] These figures highlight that strengthening Roma inclusion is not only a social priority but also a strategic lever for addressing Montenegro's demographic pressures and improving long-term economic resilience.

Roma households in Montenegro, as in much of the Western Balkans, engage in diverse informal livelihoods (e.g., seasonal agriculture, construction, street vending, repair services). Waste collection and materials recovery are among these activities and are particularly relevant to circular economy discussions because they already contribute to recycling streams, albeit informally. Regional data show that landfilling dominates waste management, with recycling rates still below EU averages, while informal collectors, mostly Roma, recover plastics, metals, and paper directly from containers or landfills.[113] In Montenegro, official waste statistics confirm that collection and disposal prevail, while formal recycling capacities remain limited. This duality creates both risk and opportunity: risk of exclusion if formalisation proceeds without social safeguards, and opportunity to professionalise familiar roles through municipal contracting, occupational safety, and basic training.

The practical know-how acquired through recycling, small-scale construction, and repair activities could be leveraged into entry-level green jobs, such as sorting and baling at materials-recovery facilities, supporting municipal waste routes, or performing minor retrofitting under energy efficiency programmes.[114] Short modular trainings with recognition of prior learning, combined with personal protective equipment provision and fair contracting, are realistic pathways to formalisation and safer employment.

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108 Ministry of Human and Minority Rights, Annual Report on the Implementation of the Strategy for the Social Inclusion of Roma and Egyptians 2021–2025, Podgorica, 2023.

109 Minority Rights Group International, Country Profile: Montenegro, 2024.

110 UNDP Montenegro, Roma Inclusion Dashboard 2023, Podgorica, 2023.

111 European Commission, Montenegro 2024 Report – Chapter on Employment and Social Policy, Brussels, 2024.

112 Roma Foundation for Europe, July 2024, Boosting the Western Balkans' Growth, available at: https://romaforeurope.org/work/articles/boosting-western-balkans-growth.

113 European Environment Agency, Municipal Waste Management in the Western Balkan Countries, Copenhagen, 2022.

114 MONSTAT, Generated and Treated Waste 2022 – Country Release, Podgorica, 2023.

Montenegro has established policy frameworks for both Roma and Egyptian inclusion[115] and for the green transition[116], but these two agendas largely progress separately. Social inclusion measures focus on improving living conditions, services, and employment opportunities for vulnerable groups, while green transition policies prioritise decarbonisation, energy efficiency, and sustainable resource management. Although each framework is well defined within its sector, the lack of linkage between them limits the ability to design green measures that also address social inequalities. As these policies move from planning to implementation, there is a clear opportunity to integrate inclusion perspectives into green investments, particularly in areas such as housing, energy access, and waste management.

The demographic and livelihood profile (young population, high informality, and concentration in recycling and low-skill services) aligns closely with the near-term opportunity set of Montenegro's green transition: energy efficiency works, municipal waste upgrades, and circular economy services. The following sections analyse how institutional frameworks and municipal delivery mechanisms can incorporate targeted access windows and skills pathways so that Roma and Egyptian communities participate meaningfully in the transition.

4.4.2. Policy and institutional framework for Roma inclusion and the green transition

Montenegro has established a relatively comprehensive policy framework for both Roma inclusion and environmental sustainability. However, these two domains remain largely separate in practice. While Roma inclusion is well institutionalised within the human rights and social sectors, the green transition agenda is being advanced primarily through energy and environmental reforms, often without explicit attention to vulnerable groups.

Institutional framework for Roma inclusion

Roma inclusion in Montenegro is guided by the **Strategy for the Social Inclusion of Roma and Egyptians 2021– 2025,** coordinated by the **Ministry of Human and Minority Rights (MHMR)**. The Strategy builds on earlier action plans and focuses on five priority areas: education, employment, housing, health, and social protection, with cross-cutting objectives on gender equality and youth empowerment.[117] Implementation is shared among several line ministries, municipalities, and specialised agencies.

The **Ministry of Labor, Employment and Social Dialogue (MoLSD)** oversees employment and social-protection measures, primarily through the Employment Agency of Montenegro, while the **Ministry of Education** and the **Ministry of Health** handle education and healthcare components. Municipalities play a key role in delivering local activities through community mediators, social work centres, and Roma coordinators.

Interviewed officials from the **MHMR** confirmed that local level implementation remains uneven. Municipalities such as Podgorica, Nikšić, and Berane have functional Roma coordinators and inclusion offices, while smaller municipalities depend heavily on donor-funded projects. Coordination between central and local actors was described as "procedurally formal but substantively weak," as monitoring and funding remain fragmented.

CSOs and international partners fill many operational gaps. NGOs and the **Roma Council of Montenegro** implement community-based projects on education, employment, and housing support. These organisations collaborate with ministries and municipalities but depend largely on short-term donor cycles. As noted during interviews, "the continuity of inclusion programmes depends on whether a project is renewed, not on whether the need persists."

Institutional framework for the green transition

Montenegro's green transition agenda is shaped by commitments under the **Energy Community Treaty** and the **EU accession process,** which require alignment with the EU Green Deal and related directives. The key policy documents include the **Low-Carbon Development Strategy 2020–2030,** the **National Climate Change Adaptation Strategy**,

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115 Government of Montenegro, Strategy for the Social Inclusion of Roma and Egyptians 2021–2025, Podgorica, 2021.

116 Government of Montenegro, Draft National Energy and Climate Plan (NECP), Podgorica, 2024. The adoption of the NECP is, however, late. Once adopted, the NECP will become the new strategic plan for the development of the energy sector until 2030, including policies and measures in the field of renewable energy and energy efficiency and aligning Montenegro's energy policy with the 2030 Energy Community targets.

117 Ministry of Human and Minority Rights, Strategy for the Social Inclusion of Roma and Egyptians 2021–2025, Podgorica, 2021, available at: https://www.gov.me.

and the draft **National Energy and Climate Plan**, whose adoption is late.[118]

The **Ministry of Ecology, Sustainable Development and Northern Development (MESDND)** leads climate and environmental policy, while the **Ministry of Energy and Mining (MoEM)** is responsible for energy planning, including renewable energy, energy efficiency, and decarbonisation. These ministries cooperate with the **Environmental Protection Agency** and municipalities through the preparation of LEAPs.

Interviewed stakeholders acknowledged that the green transition is gaining momentum but remains predominantly focused on infrastructure and compliance rather than social inclusion. No existing climate or energy strategy explicitly mentions Roma or other vulnerable groups as beneficiaries or participants.

Donor-supported initiatives are contributing to the policy momentum. Projects funded by the EU, GIZ, and UNDP, such as *Sustainable Energy for All in Montenegro and EU4Green*, have supported energy audits, public-building retrofits, and awareness campaigns. However, the inclusion of marginalised communities in these programmes is incidental rather than systematic. CSOs active in the environmental field, pointed out that social dimensions of the transition are rarely discussed in policy dialogues, despite the clear link between poverty, housing, and environmental vulnerability.[119]

Coordination between inclusion and green transition frameworks

Coordination between Roma inclusion and environmental policy frameworks is minimal. The MHMR and MESDND do not have a formal cooperation mechanism, and there are no joint working groups or shared indicators bridging social and environmental objectives. Interviewed officials from both ministries admitted that data on Roma inclusion are not integrated into environmental monitoring systems, and vice versa.

Local governments are required to prepare both Roma Inclusion Local Action Plans and LEAPs, yet these documents are developed separately and without alignment.

Nevertheless, a few pilot initiatives suggest potential pathways for integration. Under the programmes of CSOs HELP, several municipalities have implemented waste management and recycling projects that involve Roma collectors and mediators in local clean-up and awareness activities. These projects demonstrate that social and environmental objectives can be mutually reinforcing if supported by joint planning and clear contractual frameworks.

Challenges and emerging opportunities

The main challenge remains the absence of institutional mechanisms linking inclusion and green transition agendas. Ministries operate under separate funding lines, and joint programming is rare. Municipalities lack dedicated staff and budgets to mainstream Roma participation in environmental programmes. Data fragmentation further hinders monitoring: there is no systematic way to track Roma beneficiaries in energy efficiency or waste management schemes.

The forthcoming **National Energy and Climate Plan** is expected to introduce social and employment indicators in line with the EU's Just Transition principles. If properly implemented, this could serve as a turning point for embedding Roma-sensitive measures in Montenegro climate and energy policies. NGOs and Roma representatives underlined that meaningful participation in this process will depend on formal recognition of mediators and CSOs as partners, not only as project implementers.

4.4.3. Barriers and access to green opportunities

This section examines the main structural, socio-economic, and institutional barriers affecting Roma and Egyptian participation in Montenegro's emerging green transition. It also identifies enabling factors that could help bridge Roma inclusion with green and circular economy opportunities.

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118 Government of Montenegro, Draft National Energy and Climate Plan (NECP) 2024–2030, Podgorica, 2024, available at: https://www.gov.me.

119 Ecological Movement Ozon, Citizen Participation in Environmental Decision-Making in Montenegro, Nikšić, 2022, available at: https://ozonniksic.me.

Structural and socio-economic barriers

Roma and Egyptian communities in Montenegro continue to face entrenched social and spatial exclusion. Many families live in informal or substandard settlements located near industrial zones, landfills, or flood-prone areas. These conditions heighten environmental risks while simultaneously excluding households from energy efficiency and housing improvement schemes that require formal tenure and property documentation. Data from the Ministry of Human and Minority Rights confirm that the majority of Roma households in settlements such as Konik (Podgorica), Lovanja (Tivat), and Brlja (Nikšić) lack adequate infrastructure, which restricts access to programmes financed under budget or EU-funded energy efficiency initiatives.[120]

Eligibility criteria for energy-retrofit projects are often designed for homeowners with registered property rights. In practice, this excludes informal households, disproportionately Roma, from applying for subsidies. This can be described as "structural blind spot," where environmental policies do not intentionally discriminate but still produce exclusionary effects due to formal prerequisites and lack of outreach.

Limited access to utilities and unstable energy supply further exacerbate vulnerability. Interviewees emphasised that green transition measures need to start from basic service provision, otherwise the concept of sustainability remains abstract to communities living without secure access to water and electricity.

Education, skills, and labour market barriers

Roma and Egyptian participation in education and training remains low, directly constraining access to emerging green jobs. According to the Employment Agency of Montenegro, Roma youth have among the highest NEET (not in employment, education or training) rates in the Western Balkans region.[121] Public vocational training centres offer short courses in construction, electrical installation, and plumbing, yet none of these systematically target Roma learners or provide stipends and transport support that would make participation feasible.

Interviewees explained that many Roma men already work informally in construction, waste collection, and maintenance, giving them practical experience that could be formalised through recognition of prior learning and short-cycle certification. However, training programmes under the Employment Agency rarely consider this pathway. Informal work experience often goes unrecognised because there are no bridging mechanisms between informal practice and certified qualifications.

Gender disparities compound these barriers. Roma women, particularly in southern municipalities, face mobility constraints, family-care responsibilities, and persistent stigma that prevent their participation in training or employment programmes. Some interviewees acknowledged that outreach to Roma women remains limited and that pilot projects with flexible schedules and on-site childcare support have achieved better results but are still exceptional.

Institutional and administrative barriers

Institutional fragmentation continues to limit the integration of Roma inclusion within green transition frameworks. The Ministry of Human and Minority Rights leads inclusion policies, while environmental and energy competences fall under separate ministries. There is no joint coordination mechanism or shared monitoring system connecting Roma-related data with indicators on energy efficiency, waste management, or renewable energy deployment.

Municipalities are required to prepare LEAPs, yet few include Roma-specific actions. Some of the stakeholders interviewed explained that Roma participation is rarely discussed during plan preparation, partly due to limited staff and partly because local mediators are not formally involved in environmental working groups.

Administrative rigidity remains a further obstacle. Application procedures for budget and donor-funded energy programmes require identification, residence registration, and co-financing contributions that informal households cannot provide. Without simplified eligibility rules or community verification, these programmes remain inaccessible to those most affected by energy poverty.

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120 Ministry of Human and Minority Rights, Annual Report on the Implementation of the Strategy for the Social Inclusion of Roma and Egyptians 2021–2025, Podgorica, 2023, available at: https://www.gov.me.
121 Employment Agency of Montenegro, Labour Market Report 2023, Podgorica, 2023, available at: https://zrz.gov.me.

Emerging opportunities

Despite persistent barriers, several interviewees noted emerging entry points for Roma inclusion in green sectors. There is a growing shortage of workers in construction and energy efficiency retrofitting, identifying potential for targeted Roma upskilling. The forthcoming National Energy and Climate Plan also provides an opportunity to embed social inclusion indicators in energy and climate monitoring. NGOs active in environmental advocacy suggested that involving mediators and Roma coordinators in local waste management and recycling initiatives could simultaneously improve community relations and service efficiency.

Overall, progress will depend on institutional willingness to coordinate across ministries, the adaptation of eligibility rules, and the recognition of Roma mediators as partners in planning and monitoring. Without these, the structural and informational barriers outlined above are likely to persist.

4.4.4. Opportunities and gaps

Montenegro is entering a period in which both Roma inclusion and the green transition are strategic priorities, yet they continue to evolve along separate policy tracks. This section identifies key opportunities for connecting these agendas, alongside persistent structural and institutional gaps that hinder Roma participation in the economy's shift toward a low-carbon and circular economy.

Institutional and policy opportunities

Montenegro's **Strategy for the Social Inclusion of Roma and Egyptians 2021–2025** provides a clear framework for improving social participation and access to services. At the same time, the forthcoming **National Energy and Climate Plan and Low-Carbon Development Strategy 2020–2030** define priorities for renewable energy, energy efficiency, and waste management.[122] Together, these frameworks offer a foundation for mainstreaming Roma inclusion within green policies.

Several interviewees emphasised that the preparation of the National Energy and Climate Plan opens a window to align social and environmental objectives. They noted that indicators related to employment, skills, and access to energy could incorporate Roma-specific disaggregation. This would not only strengthen social monitoring but also help demonstrate equitable outcomes in line with EU Just Transition principles.

Municipalities already have parallel planning instruments: **LEAPs** and **Local Action Plans for Roma Inclusion.** The next revision cycles of these documents could be used to introduce Roma-sensitive criteria in local green initiatives, particularly in energy efficiency retrofits, waste management, and community awareness campaigns. This would allow municipalities to mobilise donor resources while responding to social inclusion goals at the local level.

Development partners, including the EU, GIZ, and UNDP, continue to play a central role in shaping Montenegro's environmental reforms. Their ongoing technical assistance programmes, especially those targeting energy efficiency and circular economy, represent a practical channel for piloting Roma-inclusive approaches. There are some indications that the current project pipeline already anticipates more explicit links between social and environmental sustainability, and inclusion of vulnerable groups is likely to be a cross-cutting indicator in upcoming EU-funded actions. [123]

Local level and labour market opportunities

At the local level, several municipalities have established functional Roma coordinator positions, and some have initiated pilot waste management and clean-up activities that engage Roma community members through temporary employment schemes. These experiences demonstrate that inclusion in environmental services can improve both livelihoods and municipal waste performance.

122 Government of Montenegro, Draft National Energy and Climate Plan (NECP) 2024–2030, Podgorica, 2024, available at: https://www.gov.me.

123 European Commission, EU Support to Green Transition and Inclusive Growth in Montenegro, Brussels, 2024, available at: https://neighbourhood-enlargement.ec.europa.eu.

The labour market perspective is also promising. Montenegro's construction and energy efficiency sectors face growing workforce shortages, which some stakeholders identified as an opportunity for inclusive employment. The **Chamber of Economy of Montenegro** publication stresses that employers increasingly demand semi-skilled labour for insulation, retrofitting, and solar installation works.[124] Roma workers already possess relevant practical experience from informal jobs in construction and recycling, and targeted short-cycle training could transform this experience into certified, safer, and better-paid employment.

Non-governmental organisations working with Roma communities, have begun developing small-scale initiatives combining environmental awareness with livelihood components. For instance, community workshops on waste sorting, energy saving, and hygiene are now accompanied by pilot work placements in municipal services. [125] Stakeholders emphasised that these experiences could be scaled up or integrated into local public works schemes if the institutional and budgetary frameworks allow it.

Data, funding, and coordination gaps

Despite these opportunities, major systemic gaps persist. The first is **data fragmentation**. Roma-related data are collected by the Ministry of Human and Minority Rights and municipalities but are not integrated into environmental or energy databases. As a result, there is no evidence base on how Roma communities participate, or do not, in green transition programmes. This makes it difficult to design targeted measures or to track the social impact of environmental investments.

The second major constraint is **funding segmentation.** Inclusion and green transition programmes are financed under separate budget lines, often from different donors and without coordination. Interviewees mentioned that this leads to duplication of efforts and prevents joint planning. Without a shared mechanism for resource allocation, integration remains dependent on individual initiatives rather than systemic policy.

A third challenge is **limited interministerial cooperation.** The Ministry of Human and Minority Rights and the Ministry of Ecology, Sustainable Development and Northern Development have distinct mandates and reporting structures, and no permanent coordination platform exists between them. Stakeholders underlined that cooperation usually occurs only when donor projects require it, which undermines sustainability once external funding ends.

Emerging prospects

Even within this fragmented landscape, opportunities for policy convergence are increasing. The integration of **Just Transition** principles into the National Energy and Climate Plan, ongoing EU-supported technical assistance, and the inclusion of employment and social indicators in Montenegro's Green Agenda commitments all point toward greater alignment between social and environmental goals.[126] Interviewees observed that the recognition of Roma mediators as formal partners in municipal planning would be a key step forward. This would ensure that inclusion objectives are represented in environmental working groups, data collection, and project evaluation.

4.4.5. Role of Roma communities and civil society in the green transition

Roma CSOs in Montenegro have traditionally focused on social inclusion, education, and human rights, but their engagement with the environmental and green transition agenda is gradually expanding. While the scale remains modest, recent partnerships between Roma CSOs, environmental NGOs, and local governments demonstrate growing recognition that environmental challenges are also social challenges, particularly for communities most exposed to pollution, waste, and climate-related risks.

124 Chamber of Economy of Montenegro, Green Economy and Workforce Development in Montenegro, Podgorica, 2023, available at: https://www.privrednakomora.me.

125 NGO HELP, Sustainable Waste Management and Social Inclusion of Roma Communities, Podgorica, 2023, available at: https://help-montenegro.org.

126 Energy Community Secretariat, Montenegro: Energy Transition Tracker 2024, Vienna, 2024, available at: https://www.energy-community.org.

Current role of Roma CSOs and community actors

Roma organisations such as the **Roma Council of Montenegro** and NGOs have begun integrating environmental themes into their inclusion work. Activities include awareness-raising on waste management, clean-up campaigns, and training sessions on recycling and energy saving. The HELP programme, for instance, has implemented small-scale waste management and livelihood projects that employ Roma participants and promote circular economy practices.[127] Interviewees from Roma organisations explained that these pilots often start with donor support but reveal strong community interest, especially when participation generates tangible income or job opportunities.

At the same time, mainstream environmental NGOs such as Ozon and Eco-team have started involving Roma communities in their advocacy and awareness campaigns. The Ozon network, for example, has implemented public consultations on environmental decision-making where mediators played an intermediary role between authorities and vulnerable groups.[128]

Interviewees noted, however, that these partnerships are still sporadic. The **Strategy for the Social Inclusion of Roma and Egyptians 2021–2025** provides a robust framework for inclusion but only indirectly references environmental aspects.[129] Without dedicated funding lines for green activities, Roma organisations struggle to expand their mandate.

Awareness, education, and engagement

Awareness and education are becoming key entry points for Roma participation in Montenegro's green transition. Local NGOs have developed community workshops on recycling, hygiene, and energy saving, frequently targeting women and youth. Environmental NGOs observed that these initiatives are effective when delivered locally and linked to small stipends or public-works schemes. Interviewees stressed that Roma youth respond positively to tangible, hands-on activities that provide both learning and income.

In Podgorica and Nikšić, municipal programmes supported by HELP and Eco-team have piloted short-term clean-up campaigns with Roma involvement. Participants received basic training, safety equipment, and short-term contracts. Stakeholders highlighted these examples as practical demonstrations of how inclusion and environmental objectives can reinforce each other if implemented through participatory local delivery models.[130]

Roma women's associations have also started to explore green livelihoods through small-scale gardening, reuse, and recycling initiatives. Stakeholders emphasised that integrating these efforts with vocational training or microfinance could sustain results beyond project lifespans. In their view, "green jobs" become meaningful only when they provide predictable income, safe conditions, and recognition within municipal systems.

Capacity and partnership gaps

Despite progress, Roma CSOs continue to face major constraints in scaling their engagement. Many organisations lack the technical expertise or administrative capacity to apply for environmental funding. Environmental NGOs, by contrast, often have the technical competence but limited access to marginalised communities.[131] Stakeholders underlined that bridging these gaps through joint mentoring and project design would strengthen inclusion and policy relevance for both sides.

Interviewees across institutions agreed that donor programmes should require partnerships between social and environmental NGOs as a condition for funding. This approach could help institutionalise cooperation between Roma mediators and environmental actors, moving collaboration from ad hoc arrangements to structured partnerships.

127 HELP, Sustainable Waste Management and Social Inclusion of Roma Communities, Podgorica, 2023, available at: https://help-montene-gro.org.

128 Ecological Movement Ozon, Citizen Participation in Environmental Decision-Making in Montenegro, Nikšić, 2022, available at: https://ozonniksic.me .

129 Ministry of Human and Minority Rights, Strategy for the Social Inclusion of Roma and Egyptians 2021–2025, Podgorica, 2021, available at: https://www.gov.me.

130 Eco-team, Energy Transition and Social Justice in Montenegro, Podgorica, 2023, available at: https://ecoteam.me.

131 UNDP Montenegro, Roma Inclusion Dashboard 2023, Podgorica, 2023, available at: https://www.undp.org/montenegro.

Community perspectives and aspirations

Community-level consultations reveal pragmatic perspectives among Roma households. Many associate environmental work with familiar occupations (waste collection, cleaning, and maintenance), but wish for formal recognition, safe working conditions, and regular pay. Women and youth, in particular, expressed interest in short, local, and paid activities such as community clean-ups, municipal landscaping, or recycling drives. When projects combine environmental goals with income support, participation and trust increase markedly.

Community representatives also highlighted the importance of training and clear communication. Several noted that **Roma families possess practical knowledge about reusing materials and could contribute to circular economy** projects if their experience were acknowledged through **recognition-of-prior-learning** or mentoring mechanisms.

Toward stronger Roma–green partnerships

Roma CSOs can play a vital bridging role between communities and institutions in Montenegro's green transition. Their networks and trust relationships are essential for mobilising participation and ensuring that environmental measures reach marginalised groups. However, to perform this role effectively, they need predictable financing, technical mentoring, and representation in planning and monitoring structures.

Environmental NGOs, in turn, can benefit from collaboration with Roma organisations, which improves social legitimacy and outreach. Several stakeholders noted that these partnerships transform technical projects into visible community benefits. Embedding such cooperation within the implementation of Montenegro's National Energy and Climate Plan and municipal LEAPs would operationalise inclusion and strengthen accountability in the economy's sustainability agenda.

4.4.6. Measures, models and recommendations

This section outlines practical measures and pilot models for strengthening Roma participation in Montenegro's green transition. The recommendations respond to the barriers and opportunities identified in the previous sections and build on emerging local initiatives. They combine evidence-based policy guidance with operational concepts feasible within Montenegro's institutional and socio-economic context.

4.4.6.1. Summary of recommended measures

Policy and programme measures

- **Integrate Roma inclusion into climate and energy frameworks.** Link the Strategy for the Social Inclusion of Roma and Egyptians (2021–2025) with the National Energy and Climate Plan and Low-Carbon Development Strategy, ensuring that social indicators and Roma participation are explicitly reflected in their implementation and reporting, which will be covered within the process of developing the new Roma Strategy for Montenegro.

- **Create social-energy access windows**. Adapt energy efficiency and renewable energy programmes to include vulnerable households lacking formal tenure or documentation, using proxy means testing and community-based verification to facilitate access.

- **Strengthen municipal delivery capacity.** Equip municipalities with guidance, tools, and modest budget lines for inclusive implementation of green measures—particularly in energy retrofits, circular economy, and local clean-up initiatives.

- **Develop a joint inclusion–climate monitoring framework**. Introduce shared indicators linking Roma inclusion goals to National Energy and Climate Plan and Green Agenda targets, enabling consistent tracking of participation, benefits, and impacts.

- **Formalise Roma engagement mechanisms.** Institutionalise Roma mediators and CSO representatives as partners in local environmental and energy planning, ensuring their participation in advisory bodies, public consultations, and monitoring processes.

Operational and skills measures

- **Formalise Roma participation in municipal environmental services**, provided that settlement conditions and basic urban infrastructure allow for formalisation. Where required by regulations, this may involve skills certification and registration with the municipality or operating under a legal entity. Depending on the context, formalisation can take the form of contracts with public utility companies, cooperatives or social enterprises, or individual registration as certified waste collectors, all with appropriate occupational-safety standards.

- **Create short-cycle training pathways for green jobs**. Partner with VET centres and contractors to develop modular training (80–120 hours) in areas such as solar photovoltaic installation, insulation, and materials recovery operations, with recognition of prior informal experience. Integrating training activities with subsidised employment instruments from the Operational Plan for Employment can strengthen Roma pathways into green-industry employment. **Support inclusive green entrepreneurship.** Provide micro-grants, mentoring, and compliance support for Roma micro-entrepreneurs active in recycling, repair, or environmental maintenance, as well as agriculture, linking them to municipal and private markets. Sustained impact will depend on legal alignment and the introduction of supportive mechanisms, including tax incentives and grants from employment service or other competent agency for those working in the green social-economy sector.

- **Target gender and youth inclusion**. Introduce flexible training schedules, stipends, childcare, and safe transport to improve participation of Roma women and youth, particularly those in NEET status.

- **Promote peer learning.** Facilitate exchange between municipalities, Roma CSOs, and environmental actors through regional mechanisms such as the Council of Europe's Roma Integration – Phase III Programme and the Energy Community's Just Transition platform.

Expected benefits

- **Economic:** Enhanced formalisation and employability, local job creation in emerging green sectors, and improved municipal waste performance.

- **Social:** Safer and more stable livelihoods, reduced discrimination, and stronger participation in decision-making.

- **Environmental:** Higher recycling rates, lower landfilling, and improved alignment with energy efficiency and decarbonisation targets.

4.4.6.2. Pilot models for implementation

MONTENEGRO - Pilot measures

Pilot 1	**"Green Entry Tracks":** Short-Cycle Training and Job Placement in Energy Efficiency and Renewable Energy Sources Sectors

Objective:
Equip Roma youth and adults with practical skills for entry-level green jobs.

Target group:
Roma youth (18–29), NEETs, and low-qualified adults.

Partners:
VET institutions, Public Employment Service, certified contractors, Roma mediators.

Core activities:
Develop modular courses with practical placements, apply recognition of prior learning, and ensure guaranteed interviews with employers. On-the-job training should be a central component of the programme, with private-sector companies actively participating to ensure that skills developed match real workplace demands.

Indicative budget:
€200,000–€350,000 for 100–150 participants.

Key indicators:
• Completion and certification rates,
 • job placements,
• retention after 6 months.

⚠️✅ **Risks & mitigation:**

Employer reluctance (co-design modules); dropout risk (stipends, flexible scheduling).

Pilot 2	**"Agro-Processing Starters":** Roma Employment in Food and Agro-Industry Value Chains

Objective:
Enable Roma workers' entry into agro-processing through short training and employer partnerships.

Target group:
Roma jobseekers near agricultural and food-processing zones, with priority for women and youth.

Partners:
Agro-processors, VET schools, employment service, Roma CSOs, and women's NGOs.

Core activities:
Develop short HACCP and hygiene modules, offer plant-based practicums, and provide stipends for participants.

Indicative budget:
€220,000–€320,000 for 100–150 trainees.

Key indicators:
• Number of trainees certified,
• employment rate, retention,
• income increase.

⚠️✅ **Risks & mitigation:**

Seasonal employment (aligned training cohorts); gender barriers (childcare, safe transport). Exploitative practices in agro-processing (conduct employer due diligence; require written contracts, fair wages, and provision of health insurance as conditions for participation).

4.4.6.3. Monitoring, evaluation and regional learning

A shared monitoring and evaluation (M&E) framework is necessary to ensure that Roma inclusion measures generate sustained results within Montenegro's green transition.

Governance: Define clear institutional responsibilities—line ministries and municipalities should collect and validate data, with Roma focal points participating in reporting and evaluation.

Data systems: Establish integration between National Energy and Climate Plan and Roma inclusion monitoring databases, enabling disaggregation by gender, age, and ethnicity while safeguarding privacy.

Frequency: Collect quarterly operational data (participation, training, jobs, retrofits) and compile annual summaries assessing outcomes (employment retention, income stability, energy savings).

Learning cycle: Implement baseline, midterm, and endline evaluations to identify progress, gaps, and replication potential. Use results for adaptive management and resource allocation.

Regional dimension: Montenegro should participate in peer exchanges within the Council of Europe's Roma Integration – Phase III Programme and the Energy Community's platforms, promoting regional learning on inclusive green transition models. Annual comparative reports could track Roma participation across Western Balkan economies, fostering transparency and accountability.

4.5. North Macedonia

NORTH MACEDONIA
Beneficiary's dashboard

1. Spatial pattern of Roma settlements

Roma live predominantly in urban and peri-urban areas, with highly visible concentration in the municipality of Šuto Orizari (Skopje), as well as in cities such as Tetovo, Prilep, Bitola and Kumanovo, often in segregated neighbourhoods.

High deprivation and pollution exposure

2. Key numbers panel

Population:
2.53% official;
80,000–260,000 estimated

Roma youth / NEET:
~67%

Material deprivation:
~90% of Roma affected

Economic loss of exclusion:
~€100m productivity +
~€21.6m fiscal (annual)

3. Policy snapshot box

Roma inclusion plan: Yes – recurring strategies and Action plans

Green / NECP: Active EE, waste and climate reforms

Explicit Roma–green link: Weak

4. Challenges and opportunities

Main barriers:

• extreme youth inactivity;

• deep socio-economic deprivation

Main opportunities:

• advanced waste/MRF pilots;

• growing solar & EE skills demand

Flagship initiatives:

• Skopje MoU for waste collector formalisation;

• Roma solar & EE starter pilots

The following section presents findings for North Macedonia, outlining the policy context, key challenges, and opportunities for linking Roma inclusion with the economy's green transition agenda.

4.5.1. Overview of Roma population and Roma inclusion and green policies context

The situation of Roma communities in North Macedonia reflects a complex intersection of socio-economic inequality, demographic vitality, and evolving priorities on inclusion and sustainability. While the economy has made visible progress in institutionalising Roma inclusion through consecutive strategies and action plans, large segments of the Roma population continue to face structural barriers to education, employment, housing, and health. At the same time, North Macedonia's commitment to the green transition - anchored in its EU accession agenda and alignment with the Green Agenda for the Western Balkans - offers new policy spaces to connect social and environmental goals. This subsection therefore outlines the demographic and socio-economic profile of Roma communities, the framework for Roma inclusion, and the broader strategic environment for green development, providing the basis for understanding how Roma participation can become an integral part of the North Macedonia's sustainable transition.

Roma communities are spread throughout the North Macedonia, with the largest and most visible concentration located in the municipality of Šuto Orizari in Skopje - widely recognised as one of the few self-governing Roma municipalities in Europe. Beyond Skopje, Roma populations live in towns such as Tetovo, Prilep, Bitola, and Kumanovo, often in segregated or economically disadvantaged neighborhoods, where access to education, employment, and basic infrastructure remains limited.[132]

The size of the Roma population in most economies is uncertain and disputed, and so is the case in North Macedonia. According to the 2021 census, the official Roma population in North Macedonia was 2.53%[133], however, some estimates suggest the actual number is significantly higher, ranging from 80,000 to 197,000,[134] and all up to 260,000 or 4% to 12% of the population.[135] Roma households tend to have more children than the average and make up the youngest and fastest-growing demographic in the North Macedonia.

Around 67% of Roma youth aged 18 to 24 in North Macedonia are neither studying, working, nor in vocational training - signalling a profound social and economic crisis as well as a missed opportunity for inclusive growth. With Roma making up roughly one-third of the North Macedonia's population under 15 and an increasing share of its future workforce, their exclusion carries significant consequences. If these trends persist, North Macedonia stands to forfeit an estimated €100 million in lost productivity and €21.6 million in foregone tax revenue each year.[136] World Bank findings show that living standards among Roma in North Macedonia remain dramatically lower than those of the wider population. Almost nine out of ten Roma experience material deprivation, in contrast to just over half of non-Roma residents, underscoring a deep socio-economic divide. Poverty disproportionately affects Roma children who are several times more likely to grow up in hardship. Similarly, Roma women's participation in formal employment barely reaches 8%, reflecting both gender and ethnic inequalities in access to work and income.[137]

Housing insecurity remains one of the most pressing challenges for Roma communities in North Macedonia. Many Roma families live in informal or substandard settlements, where overcrowding is common and living space per person often falls below five square metres. An estimated 28% of Roma reside in marginalised neighbourhoods characterised by poorly built or unregistered homes, leaving them vulnerable to eviction and without access to basic municipal services. Across the economy, roughly 80,000 Roma households lack stable or long-term housing solutions. The absence of reliable water supply, electricity, heating, and sanitation further deepens hardship, contributing to persistent health problems and social exclusion.[138]

132 Western Balkans Center for Sustainable Development (2025). Roma exclusion undercuts North Macedonia's EU bid. Retrieved from https://westernbalkanscenter.org/article/roma-exclusion-undercuts-north-macedonias-eu-bid.

133 State Statistical Office of the Republic of North Macedonia (2022). Census of Population, Households and Dwellings in the Republic of North Macedonia 2021. Available at: https://www.stat.gov.mk/PrikaziSoopstenie_en.aspx?rbrtxt=146

134 Regional Cooperation Council (RCC). Roma in the Region – The size of the Roma community in the region. Available at: https://www.rcc.int/romaintegration2020/pages/3/roma-in-the-region.

135 Jean-Pierre Liégeois (2006). Roma in Europe. In: United Nations Development Programme (UNDP), At Risk: Roma and the Displaced in Southeast Europe, Bratislava: UNDP Regional Bureau for Europe and the CIS. Available at: https://files.acquia.undp.org/public/migration/eurasia/At-risk-Roma-and-the-displaced-in-Southeast-Europe.pdf.

136 Lolita Hasani Grasmann (July 2025). Demographic renewal starts with recognising Roma. Roma for Europe. Available at: https://roma-foreurope.org/work/articles/demographic-renewal-starts-with-recognising-roma.

137 World Bank (2023). Improving access to services and economic opportunity for North Macedonia's Roma. Available at: https://www.worldbank.org/en/country/northmacedonia/brief/improving-access-to-services-and-economic-opportunity-for-north-macedonia-s-roma.

138 Minority Rights Group (2020). Roma – North Macedonia. Available at: https://minorityrights.org/communities/roma-10/.

According to the IPSOS survey from 2015, throughout their lives, the Roma population suffer acute and chronic diseases and serious disability, all with greater frequency than in the general population, the consequence of this is premature death. Access to health insurance is the key factor in reducing health inequalities within the North Macedonia.[139] Data also demonstrate gender perspective involved as Roma women in huge percentage need family permission to seek medical attention.[140]

Environmental risks also disproportionately affect Roma, including air and waste pollution, lack of sanitation, and exclusion from public services. At the same time, informal recyclers, particularly of Roma origin, called also „green agents" contribute to but are seldom recognised for, and instead being marginalised for their waste management practices. According to Josifovski and Roma Entrepreneurship Development Initiative (REDI), Roma **informal waste collectors handle an average of 2.2 tons of waste per month.** This volume corresponds to the waste generated by approximately 27 Macedonian residents each month, underscoring the **significant yet often undervalued contribution of Roma waste collectors to urban waste management and environmental sustainability.** [141]

On the policy side, North Macedonia has demonstrated long-standing commitment to advancing Roma inclusion and equality, notably through the adoption of consecutive strategies and thematic action plans as acknowledged by the Council of Europe Commissioner for Human Rights, Michael O'Flaherty in his recent 2025 visit to North Macedonia.[142] Between 2005 and 2020, the Republic of North Macedonia implemented two consecutive National Strategies for Roma Inclusion (2005–2015 and 2016–2020).[143] These strategies were supported by National Action Plans (NAPs) across key priority areas, alongside the establishment of mechanisms for coordination, monitoring, and evaluation. During this period, both targeted interventions and mainstream measures were introduced to enhance the social and economic status of Roma communities. Nevertheless, assessments by the European Commission, civil society actors, and Roma representatives themselves highlight that progress has been uneven and that stronger, more consistent implementation of public policies is needed to achieve tangible and sustainable improvements in Roma inclusion. In July 2019, during the Poznań Summit held under the framework of the Berlin Process, the Prime Ministers of the Western Balkan economies endorsed the Declaration on Roma Integration.[144] Through this commitment, they pledged to advance the social and economic inclusion of Roma populations across the region, focusing on measurable progress in education, employment, health care, housing, civil registration, and the prevention of discrimination - all with the goal of aligning conditions for Roma inclusion with European Union standards prior to accession. Steered by these commitments, North Macedonia adopted Strategy for Roma Inclusion 2022 - 2030 with technical support from the Regional Cooperation Council's project "Roma Integration 2020".[145]

4.5.2. Roma inclusion in North Macedonia's green transition: policies, initiatives, and institutional gaps

Inclusion in green transition frameworks

North Macedonia's Strategy for the Inclusion of Roma 2022–2030 acknowledges that many Roma communities live in environmentally degraded and underserved areas. Yet, despite its cross-sectoral ambition, the strategy only makes limited reference to environmental issues. Concrete examples are few, such as a proposed programme to cut air pol-

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139 UNICEF (2016). Inclusion of All Roma in the Health Insurance System. Available at: https://www.unicef.org/northmacedonia/media/3796/file/MK_RomaAccessToHealthPolicyBrief_Report_ENG.pdf.

140 Koller TS, Janeva JK, Ognenovska E, Vasilevska A, Atanasova S, Brown C, Dedeu A, Johansen A. Towards leaving no one behind in North Macedonia: a mixed methods assessment of barriers to effective coverage with health services. Int J Equity Health. 2024 Mar 15;23(1):58. doi: 10.1186/s12939-023-02082-3. PMID: 38491541; PMCID: PMC10943884. Available at: https://pmc.ncbi.nlm.nih.gov/articles/PMC10943884/#glossary1.

141 Josifovski, B., & Roma Entrepreneurship Development Initiative – REDI (2023). Informal Waste Collectors in North Macedonia. Perspectives, Constraints, and Opportunities. Available at: https://redi-ngo.eu/wp-content/uploads/2023/03/Study-Informal-Waste-Collectors-in-North-Macedonia-22032023-2.pdf.

142 Council of Europe – Office of the Commissioner for Human Rights (2025). North Macedonia: Maintain commitment to human rights of Roma and take urgent action for a healthy environment for all. Available at: https://www.coe.int/en/web/commissioner/-/north-macedonia-maintain-commitment-to-human-rights-of-roma-and-take-urgent-action-for-a-healthy-environment-for-all.

143 Ministry of Labour and Social Policy of the Republic of North Macedonia. Strategy for the Inclusion of Roma 2005–2015 and Strategy for the Inclusion of Roma 2016–2020. Skopje: Government of the Republic of North Macedonia. Available at: https://www.mtsp.gov.mk/WBStorage/Files/strategija_romi.pdf and https://www.mtsp.gov.mk/WBStorage/Files/strategija_romi.pdf.

144 Regional Cooperation Council (RCC) (2019). Declaration of Western Balkans Partners on Roma Integration within the EU Enlargement Process (Poznań Declaration). Available at: https://www.rcc.int/romaintegration2020/files/admin/docs/866ab25893dd6d9271ebccbfd195349e.pdf.

145 Strategy for Inclusion of Roma 2022 – 2030. Available at: https://www.rcc.int/romaintegration2020/files/admin/docs/ec401e5c4bf3d348990512774b419ffc.pdf.

lution in Roma neighbourhoods by 40% through alternative household heating, but broader links to climate, energy, or waste management are largely absent. The accompanying Action Plan for 2023–2025 continues this trend: its focus remains on labour market participation and social services, with minimal integration of environmental or green transition priorities.

North Macedonia's legal architecture for Roma inclusion rests on a group of core statutes, covering anti-discrimination, civil registration, social protection, free legal aid, inclusive education, and housing regularisation, which together establish the framework for equality and social rights. However, these laws remain largely detached from the environmental and green transition agenda, offering no direct provisions on sustainability, climate resilience, or environmental justice.

At the local level, some municipalities have begun to bridge this gap. A notable example is Kočani's Local Roma Action Plan (2023–2026), which integrates environmental objectives such as improving water and sewer infrastructure, remediating illegal dumps near Roma neighbourhoods, and creating public green spaces to enhance living conditions and environmental health within Roma communities.[146] Another positive local level example comes from Skopje, where in 2018 a Memorandum of Understanding (MoU) was signed between the city's public utility company and its partners to create a tangible link between social inclusion and environmental improvement. Under this agreement, Skopje's communal hygiene enterprise committed to the formalisation of up to 1,400 informal waste collectors, predominantly Roma, through structured training, provision of protective equipment, and organised work engagement. The initiative not only advanced urban recycling and reduced pollution but also represented an important step toward recognising informal recyclers as contributors to the city's green economy and providing them with dignified, safer employment opportunities.[147] However, available evidence suggests that this formalisation did not fully materialize for all the envisaged 1,400 informal collectors as many remain informal. In that sense, the initiative seems to have remained only partially implemented.

Interviewed stakeholders confirmed that, while strategies formally recognise the environmental dimension of Roma inclusion, practical coordination between the social and environmental sectors is still limited. One public-sector respondent noted that "Roma inclusion remains mainly a social policy issue, while the energy and climate strategies have not yet integrated the social equity dimension."

Civil-society organisations emphasised that local pilots, like those in Skopje and Kočani, demonstrate the potential for linking inclusion and environmental improvement, but they remain isolated. According to several interviewees, municipalities are willing to act "when there is a donor or external project," yet lack the budget and technical guidance to sustain such efforts after project completion.

Roma community organisations also highlighted the symbolic importance of formalising waste collectors, describing it as "a breakthrough in visibility and dignity," while cautioning that similar initiatives have not been replicated in other cities due to administrative and political inertia.

Programmes and initiatives supporting Roma participation in the Green Agenda

Roma Integration - Phase III is a Joint Project of the European Union and the Council of Europe. It aims to strengthen the capacity of governments in the Western Balkans and Türkiye to effectively address the multifaceted challenges faced by the Roma community through the implementation of comprehensive public policies.[148] These policies encompass critical areas such as housing, employment, civil registration, as well as the green and digital transition.

Other active projects and programmes deal with the issue of Roma statelessness[149] and there are initiatives exploring Roma Women's Struggle for Equality in North Macedonia,[150] inclusion of Roma community and civil society organisations in development and implementation of strategies and policies related to Roma inclusion, etc.[151] In 2023, the project "Roma & Covid-19: Build Back Better through sustainable waste management", implemented by REDI North Macedonia and Umweltdachverband, financed by the Federal Ministry of Republic of Austria Social Affairs, Health,

146 Municipality of Kočani (2023). Local Action Plan for Roma 2023–2026. Available at: https://romalitico.org/wp-content/uploads/2024/04/lokalen-akcziski-plan-kochani-1.pdf.

147 Public Enterprise Communal Hygiene – Skopje (2018). Memorandum of Understanding on Cooperation for Inclusion of Informal Waste Collectors. Available at: https://www.khigiena.com.mk/en/content/?id=2058.

148 See more at: https://www.coe.int/en/web/ankara/roma-integration-phase-iiii.

149 #RomaBelong project. More information available at: https://www.institutesi.org/resources/roma-belong-western-balkans-and-ukraine.

150 See more at: https://globalforumcdwd.org/persistent-exclusion-roma-womens-struggle-for-equality-in-north-macedonia/.

151 USAID Roma Inclusion Project. See more at: https://romalitico.org/27/07/2023/proekt-na-usaid-za-inkluzija-na-romite/proekt-na-usaid-za-inkluzija-na-romite/.

Care and Consumer Protection, explored in detail the concept of „green agents" and key role of Roma people in the chain of recycling and knowledge of recycling practices.[152]

Interviewees confirmed that such pilot projects have raised awareness about Roma contributions to circular economy activities but remain largely fragmented and donor-dependent. Several respondents emphasised that "green" components are often incidental, added as project extensions rather than part of a structured Roma inclusion policy. They also noted that despite "solid results" in awareness and training, the pilots have not been scaled up due to a lack of coordination and limited funding continuity.

Overall, excluding a handful of positive examples, initiatives or promoting the inclusion of Roma communities in the Green Agenda and transition remain rather limited.

Role of local governments and municipalities

The Strategy promotes equitable representation of Roma as a workforce in the local state administration, but also emphasises municipal and local level work in the areas of housing, urban development, reducing gap in living conditions between Roma and non-Roma population, improvement of the communal infrastructure in the Roma neighbourhoods, etc. Furthermore, the Strategy 2022–2030 itself links Roma policies with the Western Balkans green agenda (environmental justice, green transformation) and underlines the local role in housing/utilities - reminding municipalities to align green projects with Roma inclusion. In 2024, 14 partner municipalities in the Pelagonija and Southwest regions have successfully developed and endorsed their Waste Management Local Action Plans (LAPs), a step towards promoting the Integrated Regional Waste Management System[153]. However, eight of them that are available online use generic language such as "including vulnerable groups" or reference women/people with disabilities but provide no mention to Romani people. Interviewed stakeholders noted that municipal delivery improves when projects fund mediator-led outreach and specify inclusion criteria in tenders, but most local plans still rely on generic "vulnerable groups" language and lack Roma-specific targets, especially once donor support ends.

Policy and institutional gaps in Roma inclusion

Core Roma policy instruments still do not carry environment or climate measures. The Roma Strategy 2022–2030 does acknowledge the digital and green agenda (incl. "environmental justice" and "green transformation"), but with-out backed up, sector specific action lines and budgets, it remains aspirational. The National Energy and Climate Plan 2021–2030 frames an objective on vulnerable consumers/energy poverty, yet the targeting tools have only just been put in place (a new methodology was announced recently).[154] Stakeholders confirmed this but noted that these frameworks still lack Roma-specific chapters, and that inclusion mandates sit mainly with social/employment institutions, leaving coordination and accountability diffuse. They also pointed to inconsistent "green" tagging in monitoring systems and the need for simple joint indicators.

Many Roma families live in unlegalised or precarious housing/settlements, which restricts their access to utility connections and home retrofit subsidies. Furthermore, no legal address often equals no eligibility for energy efficiency grants, connection upgrades, or resilience works - locking Roma communities out of key green transition investments. Roma are also frequently struck by unequal basic environmental services as documented in the 2025 case of discriminatory waste collection practices affecting Šuto Orizari.[155]

152 See more at: https://eeb.org/wp-content/uploads/2023/02/vf-Between-Circularity-Environmental-Justice-and-Slow-Violence%E2%80%94The-Case-of-Roma-Informal-Recycler-Communities-in-North-Macedonia_kd-1.pdf.

153 Ministry of Environment and Physical Planning of the Republic of North Macedonia (2024). Municipalities adopt Local Action Plans for Waste Management. Available at: https://arhiva.moepp.gov.mk/en/nastani/%D0%BE%D0%BF%D1%88%D1%82%D0%B8%D0%B-D%D0%B8%D1%82%D0%B5-%D1%83%D1%81%D0%B2%D0%BE%D1%98%D1%83%D0%B2%D0%B0%D0%B0%D1%82-%D0%B-B%D0%BE%D0%BA%D0%B0%D0%BB%D0%BD%D0%B8-%D0%B0%D0%BA%D1%86%D0%B8%D1%81%D0%BA/.

154 Macedonian Information Agency - MIA (2025). North Macedonia sets up first energy poverty methodology. Available at: https://mia.mk/en/story/macedonia-sets-up-first-energy-poverty-methodology.

155 European Roma Rights Centre – ERRC (2025). North Macedonia: Victory for Roma in Shuto Orizari Following Mass Complaint About Waste Pollution. Available at: https://www.errc.org/news/north-macedonia-victory-for-roma-in-sutka-following-mass-complaint-about-waste-pollution.

4.5.3. Barriers and opportunities for Roma participation in North Macedonia's green economy

Structural and environmental barriers to Roma participation in green initiatives

The central-level strategy creates a policy disconnect as it focuses on employment, social services, entrepreneurship and youth activation, but it does not set environment/climate objectives or green economy skills pathways. The same goes for the respective action plan which leaves no mechanism that bridges Roma inclusion with climate or circular economy measures. Stakeholders confirmed that "green" strategies typically reference "vulnerable groups" without Roma-specific targets or clear accountability, which dilutes responsibility and impact.

Furthermore, the action plan invests in general activation measures (including a 5% Active Labour Market Policy quota for Roma), entrepreneurship/formalisation, and digital skills for Roma youth. However, it does not earmark training specifically for green sectors such as energy efficiency, renewables, repair and reuse, or organic production.[156]

There is also a weak link to municipal systems. Namely, without local pathways that connect informal collectors/repairers to municipal waste and circular economy systems, Roma contributors remain excluded from contracts, training and social protection. Some interviewees mentioned that combining short training with paid try-outs in municipal services markedly increases participation and outcomes, but such models are sporadic and project dependent.

Studies document substandard housing, gaps in water/sewer access and proximity to waste and industrial pollution, which translates into higher health risks and lower participation capacity.[157] Finally, while there are new public programs (e.g., inverter ACs/aid for vulnerable consumers),[158] many Roma households cannot meet eligibility or co-financing requirements for efficiency upgrades or clean heating swaps. Finally, there is a low trust and limited participation channels in urban environmental planning processes, which is why the Council of Europe explicitly urges North Macedonia to close the gap between commitments and reality for Roma and environmental protection, noting weak community engagement.[159] However, interviewees described consultations as "formally open but substantively inaccessible," due to short deadlines, technical language, and a lack of feedback loops.

Obstacles to education, training, and employment in the green economy

As elaborated above, the action plan does not define dedicated green curricula or certificates (e.g., building retrofits, solar installation, waste sorting operations, composting) within its active labour market measures which constrains Roma entry into green work occupations. During the interviews, it was stressed that many green roles require accredited qualifications and formal experience; incentives and practical guidance are needed for inclusive hiring and training.

Moreover, Roma people are in high NEET risks. Only 26% of Roma aged 18–24 were in employment, education or training according to the 2018 UNDP/WB/EC survey (i.e., 74% NEET),[160] highlighting the lack of opportunities to accessing green skills development. While young Roma are actively involved in the Youth Guarantee in North Macedonia[161], until those pathways translate into green skills placements, young Roma will struggle to access quality green jobs. Interview feedback indicated that linking the Youth Guarantee to concrete green placements is still at an early stage and will require short modules, mentoring, and guaranteed interview days.

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156 See more at: https://natlex.ilo.org/dyn/natlex2/natlex2/files/download/116996/MKD-116996.pdf

157 Association for Emancipation, Solidarity and Equality of Women – ESE (2022). Life on the Periphery: Study on Exposure to and Impact of Environmental Risks on the Health and Living Conditions of Roma. Available at: https://esem.org.mk/wp-content/uploads/2023/11/Life-on-the-periphery.pdf.

158 Balkan Green Energy News (2025). North Macedonia tackles energy poverty with free inverter air conditioners. Available at: https://balkangreenenergynews.com/north-macedonia-tackles-energy-poverty-with-free-inverter-air-conditioners/.

159 Council of Europe – Office of the Commissioner for Human Rights (2025). Memorandum on the human rights of Roma and on issues related to the right to a clean and healthy environment in North Macedonia. Available at: https://rm.coe.int/memorandum-on-north-macedonia-by-michael-o-flaherty-council-of-europe-/1680b6bc39.

160 See more at: https://files.acquia.undp.org/public/migration/eurasia/Factsheet_FYROM_Roma.pdf.

161 1,075 Roma Youth (from 15-29 years of age) were included in the measures of the Youth Guarantee Plan 2020-2022, Ministry of Labour and Social Policy.

Finally, without inclusive recruitment, Romani-language outreach, or recognition of prior learning for informal recyclers, Roma communities will continue facing barriers in accessing education, training, and employment opportunities within the green economy. For example, prerequisites and certification hurdles (math/physics prerequisites, costly licensing, language barriers) for trades like photovoltaic installation, energy efficiency retrofits, while training offers exist,[162] they are not yet scaled or targeted to Roma youth.

Emerging green sectors and job opportunities for Roma engagement

The abovementioned formal integration of informal collectors might serve as a replicable model linking collection, sorting, and extended producer responsibility streams. Evidence from European Environmental Bureau and REDI shows Roma "green agents" already reduce landfill loads; formal contracts, personal protective equipment, and buy back agreements could scale this impact.[163] Expanding municipal/public building upgrades and donor credit lines[164] create steady demand for insulation crews, window/door installers, heating, ventilation, and air conditioning technicians, which could also serve as an entry point for short-cycle training and on-the-job learning for Roma population.

Organic and climate smart practices (soil management, composting, drip irrigation) are priorities in sector roadmaps; with outreach via farmer organisations, these can create seasonal to permanent roles for Roma in peri-urban /rural areas. Finally, the North Macedonian Circular Economy Roadmap prioritises construction/textiles/food/mining for circular shifts,[165] opening roles in selective demolition, materials sorting, reuse hubs and repair services. Interviewees emphasised that micro-grants and mentoring are decisive for Roma entrepreneurship in these niches.

Gender and generational dimensions of Roma inclusion in the green transition

Roma women's labour market participation is constrained by early marriage and caregiving. In 2017, 33% of Roma women (20–49) reported marrying before 18. Thus, programs must bundle childcare, stipends and flexible schedules.[166] Environmental exposures (air pollution, damp/mould, poor water and sanitation hygiene) disproportionately affect Roma children and pregnant women, exacerbating school absence and long term health risks that reduce employability. High NEET rates also mean pre-apprenticeships, bridge courses and paid traineeships are essential. Finally, older workers in informal recycling may lose income as systems modernise (containerisation, deposit return). Transition plans must recognise skills and provide upskilling and placement within formal operators or municipal services.

4.5.4. Roma voices, civil society, and community engagement in the Green Transition

The role of Roma civil society and community actors in advancing the Green Transition

In April 2025, after a mass complaint filed by Roma residents of Shuto Orizari together with the European Roma Rights Centre (ERRC), the equality body ruled that dumping and unmanaged waste in and around the municipality amounted to environmental racism, forcing the City of Skopje to act. The case shows how Roma community mobilisation can translate into enforceable remedies, not just advocacy.[167] Interviewed civil society representatives emphasised that

162 See example at: https://solar.org.mk/en/success-story-training-for-solar-installers/.
163 European Environmental Bureau – EEB (2023). Informal Waste Collectors and the Struggle for Environmental Justice in North Macedonia. Available at: https://meta.eeb.org/2023/10/24/informal-waste-collectors-and-the-struggle-for-environmental-justice-in-north-macedonia/. Roma Entrepreneurship Development Initiative – REDI. REDI Recycling Initiative. Available at: https://redi-ngo.eu/recycling/redi-recycling/. Josifovski, B., & Roma Entrepreneurship Development Initiative – REDI (2023). Informal Waste Collectors in North Macedonia: Perspectives, Constraints, and Opportunities. Available at: https://redi-ngo.eu/wp-content/uploads/2023/03/Study-Informal-Waste-Collectors-in-North-Macedonia-22032023-2.pdf.
164 See examples at: https://www.ebrd.com/home/news-and-events/news/2024/ebrd-eu-and-japan-support-energysaving-investments-in-north-macedonia.html and https://www.wbif.eu/investmentgrants//WB-IG08-MKD-ENE-01.
165 Organisation for Economic Co-operation and Development – OECD (2024). A Roadmap Towards a Circular Economy of North Macedonia. Available at: https://www.oecd.org/en/publications/a-roadmap-towards-circular-economy-of-north-macedonia_1973c88c-en.html.
166 See more at: https://files.acquia.undp.org/public/migration/eurasia/Factsheet_FYROM_Roma.pdf.
167 European Roma Rights Centre – ERRC (2025). North Macedonia: Victory for Roma in Šutka Following Mass Complaint About Waste Pollution. Available at: https://www.errc.org/news/north-macedonia-victory-for-roma-in-sutka-following-mass-complaint-about-waste-pollution.

this case marked a turning point for public recognition of environmental discrimination and encouraged local Roma groups to pursue similar collective complaints in other municipalities.

On the "solutions" side, Roma social enterprise actors like the Roma Entrepreneurship Development Initiative (REDI) have documented the scale and value of informal recycling - profiling constraints and policy fixes and arguing for formal recognition of Roma "green agents and eventually even established REDI Recycling social enterprise, a startup which aims to organise and employ individual Roma collectors.[168] Interviewees viewed such social enterprises as the most viable bridge between informal work and the formal economy, though they warned that sustainability depends on stable municipal cooperation and predictable pricing of recyclables.

At central level, the European Bank for Reconstruction and Development's (EBRD) first economywide solid waste investment explicitly includes measures to ensure Roma and women can participate as trainees, tying infrastructure to inclusion outcomes.[169] The National Roma Centrum is a partner in a multi year initiative "Regional Partnership for Better Implementation of the Green Agenda for the Western Balkans at Local Level" to make the EU's Green Agenda for the Western Balkans tangible at local level - mapping public perceptions, monitoring implementation, and coordinating outreach. The project aims for "inclusive and transparent" execution of the Green Agenda through 2027, and positions Roma organisations as coproducers of evidence and messengers to communities most exposed to environmental risks.[170]

Finally, Roma-led and Roma serving organisations have been turning evidence into storytelling that shifts the conversation - from academic work on "slow violence" faced by Roma recyclers,[171] to Europe wide documentation of environmental racism that keeps Roma "cut off" from basic services or "put in danger" near polluted sites.[172]

Awareness, education, and community engagement for inclusive green participation

Engagement works best when it is anchored in places Roma already use, such as community centres, schools and municipal service points, and in languages people speak at home. The new resource centre in Shuto Orizari, built to serve returnees and other marginalised residents, shows how a welcoming, energy efficient facility could potentially double as a hub for green skills orientation, waste sorting demonstrations, and sign ups for local programmes.[173]

School based workshops in Shuto Orizari have started normalising climate and environmental literacy among Roma students and teachers - precisely the kind of intergenerational entry point that sustains behaviour change.[174] Campaigns centred on health (clean air, safer waste handling), savings (lower fuel bills), and income (paid collection routes; buy back points) might be a good starting point to encourage participation in Roma neighbourhoods with local Roma CSOs as co hosts. Some community workers pointed out that such campaigns work best when linked to tangible benefits, for instance, access to small grants, employment lists, or home energy advice.

Finally, codesign matters. The most credible messages and formats (Romani language materials, peer educators, women's groups meeting times, childcare during sessions) should be specified and owned by Roma organisations.

Roma perspectives and aspirations on the green transition

In North Macedonia, community members often frame the green transition through the lens of daily exposure - uncollected waste, smoky heating, and precarious work at the bottom of value chains. Research on "slow violence" documents that Roma recyclers face cumulative health risks and social stigma, yet their work reduces landfill volumes,

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168 Roma Entrepreneurship Development Initiative – REDI. REDI Recycling Initiative. Available at: https://redi-ngo.eu/recycling/redi-recycling/.

169 European Bank for Reconstruction and Development – EBRD (2023). EBRD Supports North Macedonia's First Countrywide Investment in Solid Waste Infrastructure. Available at: https://www.ebrd.com/home/news-and-events/news/2023/ebrd-supports-north-macedonias-first-countrywide-investment-in-solid-waste-infrastructure.html.

170 See more about the project here.

171 Dunajeva, J. (2025). Slow Violence and Environmental Racism: Romani Recyclers in North Macedonia's Circular Economy. Critical Romani Studies, 7(1), 116–138. https://doi.org/10.29098/crs.v7i1.181. Available at: https://crs.ceu.edu/index.php/crs/article/view/181.

172 European Environmental Bureau – EEB. (2020). Pushed to the wastelands: Environmental Racism Against Roma Communities in Central and Eastern Europe. Available at: https://eeb.org/library/pushed-to-the-wastelands-environmental-racism-against-roma-communities-in-central-and-eastern-europe/.

173 United Nations Development Programme – UNDP North Macedonia (2025). First Resource Centre for Returnees and Other Marginalized Groups Opens in the Municipality of Shuto Orizari, Marking International Roma Day. Available at: https://www.undp.org/north-macedonia/news/first-resource-centre-returnees-and-other-marginalized-groups-opens-municipality-shuto-orizari-marking-international-roma-day.

174 Roma Education Fund. Building Bridges in Education: Riverside Model Supports Roma Communities in North Macedonia. Available at: https://roma.education/building-bridges-in-education-riverside-model-supports-roma-communities-in-north-macedonia/.

creating a clear aspiration for formalisation, safer conditions, and fair pay. These concerns were confirmed by the interviewed stakeholders, highlighting the need for formal contracts, health insurance, and municipal recognition of their contribution to circular economy goals.

Public perception work tied to the Green Agenda also shows strong support for environmental protection when paired with economic security, a nuance that Roma CSOs have been surfacing in local dialogues.[175]

4.5.5. Advancing Roma inclusion in the green transition: pilots, scale-Up, cooperation, benefits, and accountability

This section outlines practical measures and pilot models to enhance Roma participation in North Macedonia's green transition. The recommendations respond to the institutional, socio-economic and environmental barriers identified earlier in this report and align with frameworks such as the Energy-Poverty Support Scheme, the Waste Management Regionalisation Programme (EBRD), the National Roma Strategy (2023–2025), and the North Macedonia's commitments under the Green Agenda for the Western Balkans. They combine policy-level actions with operational models that can be implemented through programmes, municipal partnerships, and cooperation with VET providers, CSOs, and private-sector actors in solar, waste, and circular economy value chains.

4.5.5.1. Policy and Programme Measures

- **Integrate Roma inclusion into green and circular economy frameworks.** Ensure Roma participation is reflected in action plans on energy poverty, waste management, and green skills, with explicit indicators for outreach, participation, and impact.

- **Adapt eligibility rules in social and energy programmes.** Simplify documentation requirements to improve access to these programmes for Roma and other vulnerable groups.

- **Strengthen municipal capacity for inclusive waste management reforms.** Provide guidance and templates for municipalities replicating Skopje's cooperation model with informal waste collectors, including safety standards and transitional support.

- **Institutionalise Roma participation in environmental decision-making.** Formalise engagement of Roma coordinators, community mediators and CSOs in LEAPs, public consultations, and environmental-complaints processes.

- **Establish a joint inclusion–environment monitoring approach**. Combine social inclusion indicators with environmental and waste management targets in municipal and central-level reporting to improve oversight of Roma participation.

- **Promote coordinated delivery across ministries and institutions.** Strengthen collaboration between the Ministry of Environment, Ministry of Labour and Social Policy, VET Centre, Equality Body and Roma Strategy Unit to design joint measures on green jobs, environmental justice, and outreach.

4.5.5.2. Operational and skills measures

- **Formalise Roma participation in municipal environmental services**, taking into account whether settlement conditions and basic urban infrastructure permit formalisation. In many contexts this requires skills certification and registration with the municipality or operating under a legal entity. Where feasible, Skopje's MoU model can be replicated to integrate informal collectors into structured waste collection routes, supported by personal protective equipment, coaching, and clear registration pathways—either through public utility companies, cooperatives/social enterprises, or individual licensing schemes.

- **Leverage the EBRD regionalisation investment.** Involve Roma workers and newly formalised collectors in operations of transfer stations, sorting facilities and landfill-linked services.

- **Develop short-cycle training for green jobs.** Co-design modular solar, operation and maintenance, and

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175 Зелена агенда: Анализа и перцепции на граѓаните за Зелената агенда и нејзината имплементација во Северна Македонија [Green Agenda: Citizens' Perceptions and Analysis of Its Implementation in North Macedonia]. Available at: https://nationalromacentrum.org/en/wp-content/uploads/2025/02/%D0%97%D0%95%D0%9B%D0%95%D0%9D%D0%90-%D0%90%D0%93%D0%95%D0%9D%D0%94%D0%90-final-3.pdf.

energy efficiency courses with VET centres and Solar Macedonia, using European Training Foundation mapping to align with labour market gaps. Also, to improve job placement outcomes, training should be aligned with subsidised employment schemes offered through the Operational Plan for Employment.

- **Support inclusive circular entrepreneurship.** Provide equipment grants, mentoring, and municipal micro-contracts for circular economy activities such as repair cafés, cable/e-waste pre-sorting, reuse services and small-scale agro-processing. These measures should be aligned with legal framework, and ideally complemented by a social-economy support structure, such as tax incentives for people employed in this area and additional grants from the employment agency or other competent body.

- **Address environmental justice concerns.** Build on the Equality Body's 2025 ruling by expanding training for Roma communities on environmental rights, complaint pathways, and participation in local planning.

- Promote youth and women's inclusion in green sectors. Provide stipends, safety kits, flexible learning arrangements, and targeted outreach to increase participation of Roma youth and women in solar, energy efficiency, and waste related jobs.

- **Enable structured pathways into public-utility jobs.** Establish trainee schemes and practical internships with utility companies for roles in landscaping, maintenance, recycling logistics and basic facility operations.

- **Create central-level and regional learning loops.** Facilitate peer exchange between municipalities, Roma CSOs, environmental platforms (e.g. Solar Macedonia), and VET centres through Green Agenda and donor-supported networks.

Expected benefits

- **Economic:** Increased employment for Roma in solar, circular economy, waste management and energy efficiency sectors; stronger local entrepreneurship; and reduced dependence on informal and unsafe work.
- **Social:** Greater community participation, improved access to public programmes, safer working conditions, and stronger environmental and social rights protection—especially in areas with documented environmental burdens.
- **Environmental:** Higher recycling and sorting performance, improved waste management outcomes across regionalised systems, expanded uptake of energy efficiency measures, and stronger community engagement in environmental governance.

4.5.5.3. Pilot measures to boost Roma participation in the green transition

NORTH MACEDONIA - Pilot measures

Pilot 1	**"Energy Support Navigators":** Roma Outreach for Energy-Poverty Schemes

Objective:
Increase Roma households' access to appliance swaps and energy-subsidy schemes through structured mediation.

Target group:
Roma households with irregular documentation, atypical tenure or informal metering.

Delivery partners:
Ministry of Economy, Social Work Centres, Utility Providers, Roma CSOs.

Core activities:
Improve existing schemes at the municipal level to ensure targeted lots for Roma or set the quotas for mandatory inclusion of Roma. Raise the awareness among the bank sector on the importance of inclusion of Roma. Train Roma CSO representatives to support outreach, applications and grievance handling while simplifying eligibility pathways for vulnerable families.

Indicative budget:
€150,000–€220,000 for 400–600 households.

Key indicators:
• Successful applications;
• household energy savings;
• participation of high-deprivation settlements.

⚠️ ✅ Risks & mitigation:

Administrative barriers and low awareness are addressed by simplified proofs of eligibility and intensive door-to-door outreach.

Pilot 2

Pilot 2 "Solar and Energy Efficiency Starters":
Roma Youth Training for Solar and Energy-Efficiency Jobs"

Objective:
Equip Roma youth and women with short modular green-skills training for employment in the solar and energy-efficiency sectors.

Target group:
Roma youth (16–29) and Roma women seeking entry-level green jobs.

Delivery partners:
VET centres, Solar Macedonia, ETF, renewable-energy companies, municipal employment services.

Core activities:
Co-design short solar and energy efficiency modules using ETF skills mapping, deliver supervised practicums, and provide stipends and safety kits.

Indicative budget:
€220,000–€320,000 for 80–120 trainees.

Key indicators:
• Certification completion;
• employment within six months;
• employer satisfaction.

⚠️✅ **Risks & mitigation:**

Dropouts and employer scepticism are mitigated through mentoring, attendance incentives and employer-co-designed curricula.

Pilot 3

Pilot 3 "Roma Green Information Access:
Environmental Rights and Participation Training"

Objective:
Strengthen Roma communities' ability to access environmental information and participate in environmental decision-making.

Target group:
Roma residents of environmentally burdened areas (e.g., Shuto Orizari).

Delivery partners:
Aarhus Centre Skopje, Ministry of Environment, Equality Body, Roma CSOs.

Core activities:
Deliver workshops on environmental rights, information access and complaint pathways while providing mediation for submitting requests or grievances.

Indicative budget:
€120,000–€180,000 for 300–400 participants.

Key indicators:
• Participation in consultations;
• number of requests submitted;
• resolved complaints.

⚠️✅ **Risks & mitigation:**

Low trust and complex procedures are mitigated through independent facilitation, plain-language tools and practical support clinics.

4.5.5.4. Measuring progress: monitoring and evaluation at central level and regional levels

North Macedonia's Roma Strategy's action plan for housing and employment (2023–2025) already sets targets and dedicated actions, however, a monitoring and evaluation bridge should be built so that climate/energy/waste programmes report against Roma relevant indicators. For example:

- number of Roma formalised in municipal waste chains;
- Roma trainees certified for energy efficiency /renewable energy sources jobs;
- Roma households benefiting from energy poverty measures;
- complaints resolved via Aarhus/equality body channels.

Moreover, existing reporting cycles should include Roma disaggregated data (as for example in municipal Local Action Plans dashboards) and possibly a requirement should be made for public utilities and contractors to publish quarterly, gender and age disaggregated participation data, linked to geographies such as Shuto Orizari and other Roma-dense areas. Finally, Roma CSOs and environmental NGOs should be encouraged to submit shadow reports drawing on community monitoring and investigative pieces that have shed light on the reality of informal collection and environmental injustice.

4.6. Serbia

SERBIA
Beneficiary's dashboard

1. Spatial pattern of Roma settlements

Roma live in various communities, with higher concentrations in and around larger cities and in numerous informal or substandard settlements, often lacking adequate infrastructure.

Recurrent environmental exposure

2. Key numbers panel

Population:

~132,000 official;
300,000–460,000 estimated

Employment:

~20% employed among marginalised Roma

Informality:

~71% of employed Roma work informally

Economic loss of exclusion:

€314m–€1.28bn productivity +
€78.1–€317m fiscal (annual)

3. Policy snapshot box

Roma inclusion plan: Yes – 2022–2030

Green / NECP: NECP in place; strong recycling market

Explicit Roma–green link: Implicit only

4. Challenges and opportunities

Main barriers:

• high poverty & informality;
• low secondary education

Main opportunities:

• strong recycling/reuse sector;
• RPL & modular EE training potential

Flagship initiatives:

• social-energy access windows;
• green skills pathways in recycling, EE, RES

The following section presents findings for Serbia, outlining the policy context, key challenges, and opportunities for linking Roma inclusion with the country's green transition agenda.

4.6.1. Overview of Roma population and Roma inclusion and green-policies context

This subsection provides an overview of the Roma population in Serbia, highlighting demographic characteristics, socio-economic conditions, and key challenges faced in accessing education, employment, and public services. It also reviews the Serbia's context for Roma inclusion and the broader green transition, including relevant strategies, institutional frameworks, and policy commitments. Taken together, this overview situates the Beneficiary-specific analysis within both the population realities and the policy environment shaping Roma participation in the green transition.

The Roma population in Serbia is officially recorded at **131,936 persons** identifying as Roma in the 2022 census (approximately 2.0 % of the total population).[176] However, multiple sources indicate that this figure substantially undercounts the real number of Roma; credible estimates suggest a Roma population of between **300,000 and 460,000.**[177] The historic under-registration and the fact that many Roma live in informal settlements or face stigma mean the official figure is likely a conservative estimate.

Socio-economically, the Roma community in Serbia experiences severe disadvantage. A factsheet produced by UNDP in 2017 noted that **83 %** of "marginalised Roma" in Serbia faced severe material deprivation, compared with **41 %** of neighbouring non-Roma.[178] In education, only 17 % of marginalised Roma children aged 3–6 were enrolled in pre-primary school in 2017, and more than one-third of marginalised Roma aged 18–21 lacked a complete compulsory education. According to available data, the enrolment of Roma in primary education is 85% and the completion rate is 64%. [179] In secondary education, the enrolment rate is low at 28%, and the completion rate is 61%.[180] Labour market participation is likewise low: in 2017 only about one-fifth of marginalised Roma aged 15–64 were employed (versus about 40 % of neighbouring non-Roma)[181] and informal employment remains very high (about 71 % of employed marginalised Roma in 2017).[182] Data from the Serbian National Employment Agency show that between 2021 and 2024, the number of unemployed Roma decreased from 27,595 in 2020 to 25,486 in 2024, but the share of Roma in the register is increasing. This suggests that, while the general labour market is improving, the Roma community continues to face persistent or even exacerbated challenges in the transition to stable employment opportunities. The latest data from March 31, 2025 show that 26,781 members of the Roma community are registered with the Serbian Employment Service as unemployed.[183]

Serbia is projected to experience one of the steepest workforce declines in the region, with a **43% reduction** expected by 2050. This demographic contraction will generate an annual demand for nearly **69,000 new workers,** placing significant pressure on labour supply. With an estimated 300,000 and 460,000 Roma citizens, Serbia has a sizeable population segment with unrealised labour market potential. The economic implications are substantial. Serbia loses an estimated **€314 million to €1.28 billion in productivity every year** due to Roma exclusion from the workforce, alongside **€78.1–€317 million in foregone fiscal revenues.**[184] These figures underscore that improving Roma labour market inclusion is not only a social imperative but also a strategic economic opportunity, particularly in a context of accelerating demographic decline.

An additional survey (2023) of informal Roma settlements in Belgrade found that typical households had 4–6 members, large proportions (over 60%) reported poor housing conditions (leaks, mould, lack of bathroom, etc.), and only 44% reported that they received regular social financial aid.[185]

In terms of living environment, many Roma in Serbia reside in informal settlements or marginalised neighbourhoods lacking secure tenure, adequate infrastructure, and formal connections to utilities. According to a report by Civil Rights Defenders, more than half of all Roma in Serbia live in such settlements.[186]

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176 Statistical office of Serbia, 2022 Census figure.

177 Minority Rights Group, Roma Poverty and the Roma National Strategies: The cases of Albania, Greece and Serbia by Abdikeeva A., December 2023.

178 UNDP, Serbia: Key Indicators – Roma Factsheet 2017.

179 Multicluster Indicator Survey 6, UNICEF, October 2020, p.35, available at https://www.unicef.org/serbia/en/reports/statistical-snapshot-multiple-indicator-cluster-survey-2019 .

180 Ibid.

181 UNDP, Serbia: Key Indicators – Roma Factsheet 2017.

182 Ibid.

183 Draft Analysis of the Impact of Employment and Self-Employment Measures on the Position of Roma in the Labour Market in Serbia

184 Roma Foundation for Europe, July 2024, Boosting the Western Balkans' Growth, available at: https://romaforeurope.org/work/articles/boosting-western-balkans-growth.

185 Center for Investigative Journalism (CIM), Informal Roma Settlement Household Survey – Belgrade 2023.

186 Civil Rights Defenders, Report on the Position of Roma Men and Women in Serbia.

In the field of waste collection and recycling, informal waste collecting plays a significant role. A report by the European Environment Agency noted that in Serbia between **30,000 and 50,000 individual waste collectors** are believed to be active, most of whom are Roma or other economically marginalised persons.[187]

With respect to the green transition, Serbia has taken steps to align with circular economy and waste management reform. For example, Serbia adopted a "Circular Economy Development Programme" in 2022 (running through year end) and a new programme for 2025-2030 is planned.[188] In January 2022, as part of the negotiations for accession to the European Union, the Republic of Serbia initiated the process of establishing a waste management system under Chapter 27 "Environment and Climate Change", by adopting the Waste Management Program (WMP) for the period 2022-2031. The programme aims to support a number of informal waste collectors affected by the modernisation of the waste management system in the local governments covered by the Solid Waste Program. This programme is an opportunity to improve the position of Roma informal waste collectors.[189]

A guideline document for local waste management noted that although Serbia has adopted important legal frameworks, such as the Waste Management Programme 2022-2031, there remain gaps in implementation, especially with regard to data collection, formal inclusion of informal waste collectors, and harmonisation with EU law.[190]

In an impactful example of linking Roma inclusion and circular economy, UNDP Serbia that the cooperative Connect Clean Roma Group engages informal Roma waste collectors in an organised recycling system: their members collect old cables, strip and granulate metals, work with over 30 subcontractors, and claim that informal collectors supply more than 87 % of the raw materials to Serbia's recycling industry.[191] This illustrates a practical bridge from informal livelihoods towards more formal green-economy roles.

The evidence indicates clear entry-points for Roma inclusion: existing roles in waste collection/sorting could be "anchored" into formal employment, cooperatives and contractual arrangements; training pathways can convert informal experience into certified green-skills (e.g., sorting, baling, collection logistics, small-scale recyclables processing); and policy frameworks already recognise both Roma inclusion and circular economy (though implementation remains uneven).

However, the structural deficits also present real risks: without targeted inclusion, Roma risk being further marginalised as formal systems replace informal ones, or being trapped in the least secure parts of the green economy (hourly, informal, without rights). This means that for Roma inclusion to be meaningful, green transition policies must embed deliberate "entry windows" for Roma, monitor participation explicitly, and design bridging supports (e.g., micro-credit for cooperatives, legal recognition of collectors, health and safety training, social protection linkages).

Serbia offers a potentially strong case where Roma experience and practices (in informal recycling) can be leveraged within the green transition, but only if policy design, institutional mechanisms and funding align purposefully with inclusion. The subsequent sections will analyse how institutional frameworks and municipal/regional delivery mechanisms in Serbia can integrate targeted access windows and skills pathways so that Roma communities participate meaningfully in the transition.

4.6.2. Policy and institutional framework for Roma inclusion and the green transition

Serbia has developed separate policy frameworks for Roma inclusion and for its green transition agenda, but their linkage remains weak in practice. The institutional architecture for Roma inclusion is reasonably developed; the institutional setup for the green transition is gaining momentum; however, coordination between the two remains minimal and vulnerable to fragmentation.

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187 European Environment Agency, Serbia – Municipal Waste Management Country Fact Sheet 2021.
188 UNDP Serbia, "Awarded Best Innovations for the Implementation of Circular Economy", Nov 26 2024.
189 Programme implemented through the Joint UN Programme "PRO - Local Governance for People and Nature," jointly carried out by United Nations agencies in Serbia: United Nations Office for Project Services (UNOPS), UNICEF, United Nations Population Fund (UNFPA), and United Nations Environment Programme, in cooperation with the Government of Serbia and with financial support from the Government of Switzerland, from 1 January 2023 to 31 December 2026.
190 PRO (Platform for Responsible Business), Guidelines for Including Informal Waste Pickers into Local Waste Management Systems, Serbia, June 2025.
191 UNDP Serbia, "Including Informal Waste Pickers in Waste Reduction Mission", Jan 10 2024.

Institutional framework for Roma inclusion

The strategic reference for Roma inclusion is the Strategy for Social Inclusion of Roma in the Republic of Serbia 2022-2030, adopted by the government in February 2022.[192] The strategy builds on the earlier 2016–2025 strategy and sets out five priority areas: education, employment, health, housing and social protection, with cross-cutting objectives on gender equality and youth empowerment.[193] Implementation is organised via a Coordination Body for Improving the Status and Social Inclusion of Roma (comprising officials from several ministries) and local self-governments.

In practice, ministries such as the Ministry for Human and Minority Rights and Social Dialogue (MHMRSD) coordinate the strategy, while line ministries (Education; Labour, Employment, Veterans and Social Affairs; Health) take thematic responsibility. Local municipalities are expected to develop their Roma Inclusion Local Action Plans and to engage Roma coordinators and mediators. According to report analysis, many municipalities have formal frameworks in place, but capacities and budget allocations vary greatly from one municipality to another.[194] Interviewees stressed that local authorities still depend on donor-financed projects rather than permanent budget lines for Roma inclusion interventions.

While the strategy emphasises improved data collection, monitoring and evaluation, a key gap remains in the systematic tracking of implementation across municipalities and in the linking of Roma inclusion efforts with other sectoral policies (housing, environment, labour).[195]

Institutional framework for the green transition

The green transition framework in Serbia is rooted in several key documents. Notably, the Circular Economy Development Programme in the Republic of Serbia 2022-2024, coordinated by the Ministry of Environmental Protection, lays out measures to advance the circular economy, waste management reform, green procurement, and innovation.[196] The Roadmap for Circular Economy in Serbia (2021) prepared by UNDP serves as a guiding document for a more systemic transition.[197] The green transition agenda also features in broader strategic documents such as Serbia's Sustainable Development Strategy and the European Bank for Reconstruction and Development's Serbia Strategy, which emphasises accelerating Serbia's green energy transition and strengthening circular economy infrastructure.[198]

Responsibility for implementation spreads across multiple ministries (Environment; Mining and Energy; Economy) and local governments through Local Environmental Action Plans and municipal infrastructure projects. The Organisation for Economic Co-operation and Development (OECD) notes that despite the growing number of green transition programmes, "social inclusion remains marginal in environmental and energy planning."[199]

Coordination between Roma inclusion and green transition frameworks

At the central level, there is limited formal coordination between the Roma inclusion framework and the green transition ecosystem. The MHMRSD and the Ministry of Environmental Protection do not currently operate joint working groups or shared data systems that track Roma participation in green economy programmes. A positive example is the inclusion of civil society representatives advocating for the improvement of the status of individual waste col-

192 Ministry for Human and Minority Rights and Social Dialogue, Republic of Serbia. Strategy for Social Inclusion of Roma in the Republic of Serbia 2022-2030 (English version). Available at: https://minljmpdd.gov.rs/wp-content/uploads/2024/04/Strategy-for-Social-Inclusion-of-Roma-in-the-Republic-of-Serbia2022-2030-eng.pdf.

193 Ibid.

194 Regional Cooperation Council / Roma Integration 2020. Analysis of mainstream policies targeting Roma integration in Serbia. Available at: https://www.rcc.int/romaintegration2020/files/admin/docs/48e20612f5e16bfbe37f0f61db300c0b.pdf.

195 Council of Europe – ROMACTED Phase II Serbia. Conference on Social Inclusion Measures for Roma at the Local Level. Available at: https://www.coe.int/en/web/ankara/roma-integration-phase-iii.

196 Ministry of Environmental Protection, Republic of Serbia. Circular Economy Development Programme in the Republic of Serbia 2022-2024. Available at: https://www.cirkularnezajednice.rs/wp-content/uploads/2023/03/Program-for-development-of-circular-economy-in-the-Republic-of-Serbia-for-the-period-2022-2024.pdf.

197 United Nations Development Programme (UNDP) Serbia. Roadmap for Circular Economy in Serbia. Available at: https://www.undp.org/serbia/publications/roadmap-circular-economy-serbia.

198 European Bank for Reconstruction and Development (EBRD). Serbia Country Strategy 2023-2028. Available at: https://www.ebrd.com/content/dam/ebrd_dxp/assets/pdfs/country-strategies/serbia/EBRD-Latest-Serbia-Strategy.pdf.

199 OECD – Green Transition in the Western Balkans Programme. Supporting Green Transition through Circular Economy Roadmaps: Serbia. Available at: https://www.oecd.org/en/about/programmes/oecd-south-east-europe-regional-programme/green-transition-in-the-western-balkans.html.

lectors in the working group for the draft Law on Waste Management. It has been proposed that a register of waste collectors be established under the management of the Agency for Environmental Protection. In addition, benefits for local self-governments that support social entrepreneurship have been suggested, along with the possibility for public companies to contract with registered waste collectors or their social enterprises.

At the local level, municipalities often prepare separate Roma inclusion and environmental/circular economy action plans, developed under different units and without alignment of budgets, indicators or staff. In a minority of cases, pilot projects have attempted to link the two: for example, a waste management initiative in a Serbian municipality engaged Roma mediators to touch base with informal waste collectors and integrate them into a local sorting hub. These projects demonstrate potential yet remain sporadic and largely dependent on external funding rather than institutionalised mechanisms.

Challenges and emerging opportunities

The chief challenge is the structural separation of the inclusion and green transition agendas: ministries work with different funding sources, guidelines and performance indicators; local governments often lack dedicated budgets or staff to bridge social inclusion and environmental programmes; data systems are fragmented, making it difficult to monitor the extent of Roma involvement in green transition interventions.

Nevertheless, emerging opportunities point to possible change: the 2025 revision of Serbia's National Energy and Climate Plan and the mid-term review of the Circular Economy Programme may open a window to embed social inclusion indicators (including Roma) in green transition policies. Various Roma cooperative and waste collection entities have already signalled their interest in formalised roles in circular economy value chains. Should policy design include formal contractual entry points, training schemes for green skills, and partnerships with local municipalities and private operators, Roma inclusion in the green economy could move from peripheral to integrated.

4.6.3. Barriers and access to green opportunities

This section analyses the main structural, socio-economic, and institutional barriers affecting Roma participation in Serbia's emerging green transition. It also outlines enabling factors that could support stronger connections between Roma inclusion and circular economy or green jobs opportunities. The analysis draws on Serbian data, relevant policy documents, and insights from stakeholder interviews conducted during the study.

Structural and socio-economic barriers

Roma communities in Serbia continue to face entrenched patterns of exclusion, spatial segregation, and poverty that directly limit their participation in the green transition. Many Roma households live in informal or substandard settlements without legal tenure, adequate infrastructure, or reliable access to utilities. These conditions increase environmental vulnerability, such as exposure to pollution, flooding, or waste, and simultaneously prevent households from benefiting from energy efficiency and housing retrofit schemes that require proof of ownership or registered addresses.[200]

Stakeholders noted that eligibility criteria for budget and donor-funded programmes are not intentionally discriminatory but remain structurally exclusionary. Procedures for obtaining energy efficiency grants or green housing subsidies require formal property documentation, co-financing contributions, and stable income, which all constitute prerequisites that most informal or low-income Roma households cannot meet. As a result, these programmes often reinforce existing inequalities instead of reducing them.

Energy insecurity further compounds vulnerability. Many Roma families experience irregular supply, poor insulation, and inefficient heating methods, which make energy poverty widespread. Interviewees agreed that green transition measures must start from the level of basic service provision, such as secure access to electricity, heating, and safe water. Without these foundations, sustainability concepts and energy-saving schemes remain abstract and inaccessible. In 2022, the Government adopted the [Decision on Energy Endangered Consumers](#) [201], with subsequent amendments

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200 Ministry for Human and Minority Rights and Social Dialogue, Republic of Serbia. Strategy for Social Inclusion of Roma in the Republic of Serbia 2022–2030.

201 Official Gazette of the Republic of Serbia", no. 137/2022, 46/2023 - oth. rulebook, 93/2023, 103/2023 - oth. rulebook, 116/2023, 37/2024 - oth. rulebook, 78/2024 - oth. rulebook, 28/2025 - oth. rulebook, 83/2025 and 83/2025 - oth. rulebook, available at: https://www.paragraf.rs/propisi/uredba-o-energetski-ugrozenom-kupcu-republike-srbije.html.

in 2023, 2024 and 2025, as reported in the European Union Progress Report for 2022, Chapter 15 „Energy". This Decision is particularly relevant for the most vulnerable members of the Roma community, as it allows reduced energy costs for Roma who receive social financial support, as well as for those with health related difficulties.

Education, skills, and labour market barriers

Low education attainment and high informality constrain Roma access to emerging green economy jobs. According to reports on Serbia and regional reports, Roma youth in Serbia have some of the highest NEET (Not in Employment, Education, or Training) rates in the Western Balkans.[202] While vocational training centres offer short courses in construction, electrical installation, or waste management, few are adapted to Roma learners or accompanied by the financial and logistical support necessary to ensure participation.

Stakeholders highlighted that many Roma men and women already possess practical experience in construction, recycling, and maintenance, which could be formally recognised through short-cycle training or certification of prior learning. However, these pathways remain underdeveloped. Training institutions rarely acknowledge informal skills, and access to certification mechanisms is limited. This prevents informal workers from transitioning into safer, better paid, and legally protected green jobs.

Gender disparities further reinforce exclusion. Roma women, particularly in smaller or peripheral settlements, face cultural expectations, mobility constraints, and domestic care responsibilities that limit participation in training and employment schemes. Interviewees emphasised that targeted outreach, flexible schedules, and community-based learning environments could improve participation, but such approaches are still exceptions rather than standard practice.

Institutional and administrative barriers

Institutional fragmentation remains a persistent obstacle. Roma inclusion and green transition policies operate under different ministries and funding lines, with limited coordination mechanisms or shared monitoring systems. Strategies, such as the abovementioned *Strategy for the Social Inclusion of Roma in the Republic of Serbia 2022–2030 and the Circular Economy Development Programme 2022–2024*, are implemented in parallel, without integrated objectives or indicators linking social inclusion to environmental sustainability.

At the local level, Roma Inclusion Action Plans and Local Environmental Action Plans are often prepared independently, based on separate guidance, data sources, and budgets. Stakeholders observed that Roma participation is rarely discussed during environmental plan preparation, partly due to limited municipal capacity and partly because community mediators are not formally involved in environmental working groups.

Administrative barriers further restrict access to funding and benefits. Application procedures for budget or donor-funded programmes require identification documents, proof of residence, and co-financing—criteria that exclude the majority of informal households. Without simplified eligibility rules or community-based verification, green transition programmes remain out of reach for the very groups most affected by energy poverty and environmental risks.

Emerging opportunities

Despite the systemic barriers, several developments indicate potential entry points for Roma inclusion in green sectors. The expansion of waste management and circular economy infrastructure under the *Circular Economy Development Programme* and related initiatives creates opportunities to formalise informal recycling work in which many Roma are already active.[203] The example of cooperative and community based recycling models demonstrates that informal waste collectors can be integrated into municipal value chains when supported by structured contracts, safety training, and recognition of prior experience.[204]

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202 Regional Cooperation Council. Analysis of Mainstream Policies Targeting Roma Integration in Serbia. Available at: https://www.rcc.int/romaintegration2020/files/admin/docs/48e20612f5e16bfbe37f0f61db300c0c0/.

203 Platform for Responsible Business (PRO). Guidelines for Including Informal Waste Pickers into Local Waste Management Systems, Serbia. Available at: https://www.pro.org.rs/uploads/files/205-1586-pro-lgpn_guidelines-for-lap-for-wm_final_en_0625.pdf.

204 United Nations Development Programme (UNDP) Serbia. "Including Informal Waste Pickers in Waste Reduction Mission." 10 January 2024. Available at: https://www.undp.org/serbia/stories/including-informal-waste-pickers-waste-reduction-mission.

Labour market trends also suggest increasing demand for workers in energy efficiency retrofitting, construction, and maintenance—areas that match existing Roma skills. Stakeholders agreed that targeted upskilling and certification initiatives could transform informal experience into recognised employment, contributing both to inclusion and to Serbia's circular economy objectives.

At the policy level, the forthcoming revision of the National Energy and Climate Plan and the continuation of the Circular Economy Programme beyond 2024 provide opportunities to integrate social inclusion indicators and specific targets for Roma participation. The draft Law on Waste Management, currently under preparation[205], offers additional space to improve the recognition and protection of individual waste collectors, who remain largely unregulated despite their role in the recycling chain. Interviewees emphasised that coordination between social and environmental institutions, the adaptation of eligibility criteria, and the formal recognition of Roma mediators as partners in planning processes would be key enablers for sustained progress.

4.6.4. Opportunities and gaps

Serbia is at a stage where both Roma inclusion and the green transition have gained strategic importance in policy, yet they continue to develop within distinct institutional and sectoral frameworks. While the Government of Serbia has established clear frameworks for Roma inclusion and has accelerated reforms in energy, environment, and the circular economy, these agendas are only beginning to converge. The green transition is being driven primarily by energy efficiency, waste management, and environmental protection objectives, whereas Roma inclusion remains concentrated in the human rights and social policy domains. Bridging these spheres offers significant potential for equitable, sustainable growth but requires targeted institutional coordination, cross-sector financing, and inclusive policy design.

Institutional and policy opportunities

The *Strategy for the Social Inclusion of Roma in the Republic of Serbia 2022–2030* defines long-term objectives for Roma access to education, employment, housing, health, and social protection. Parallel to this, Serbia's *Circular Economy Development Programme 2022–2024 and the upcoming National Energy and Climate Plan (2025–2030)* represent core policy instruments for the green transition.[206] These frameworks, although developed independently, share complementary goals on employment creation, energy efficiency, and social welfare, providing a foundation for mainstreaming inclusion within green policy design.

Stakeholders emphasised that the forthcoming revision of the National Energy and Climate Plan and the continuation of the Circular Economy Programme beyond 2024 create a unique window to embed social inclusion and employment indicators aligned with the EU's *Just Transition* principles. If Roma participation and data disaggregation are integrated into climate, energy, and circular economy monitoring systems, Serbia could demonstrate tangible progress toward equitable sustainability outcomes.

The recently launched Green Agenda for the Western Balkans, to which Serbia is a signatory, further reinforces this opportunity. The Agenda's pillars on decarbonisation, energy transition, and sustainable mobility require complementary social measures to ensure fairness.[207] Integrating Roma sensitive actions into Serbia's implementation plan would support both EU alignment and domestic inclusion commitments.

Development partners play a pivotal role in this convergence process. The EU, UNDP, GIZ, and the World Bank have ongoing technical assistance programmes supporting green investments and local level sustainability initiatives.[208] These projects often work through municipal frameworks, providing an entry point for piloting Roma inclusive approaches. Stakeholders observed that donor coordination has improved compared with previous cycles, and that upcoming EU-funded actions are likely to include explicit social indicators. Aligning these initiatives with the Serbia Roma inclusion strategy could enable consistent Roma participation in energy efficiency retrofits, recycling, and environmental services.

205 https://www.paragraf.rs/dnevne-vesti/080925/080925-vest5.html.

206 Government of Serbia / Ministry of Mining and Energy. Draft National Energy and Climate Plan (NECP 2025–2030). Available at: https://www.mre.gov.rs/doc/energetska-efikasnost/NECP-draft-2024.pdf.

207 European Commission. Green Agenda for the Western Balkans – Implementation Roadmap for Serbia. Available at: https://neighbourhood-enlargement.ec.europa.eu/system/files/2021-07/green-agenda-western-balkans-roadmap-serbia.pdf.

208 United Nations Development Programme (UNDP) Serbia. EU for the Green Agenda in Serbia – Project Overview. Available at: https://www.undp.org/serbia/projects/eu-green-agenda-serbia.

Local level and labour market opportunities

At the local level, Serbia's municipalities have formalised Roma inclusion offices and coordinators in most urban areas, creating an institutional presence that can be leveraged for the green transition. Municipalities also implement LEAPs, which are mandatory under the Law on Environmental Protection. The next revision cycles of both instruments could be synchronised to include Roma sensitive objectives, such as improved access to waste collection services, participation in community clean-up campaigns, or inclusion in energy efficiency works on social housing.

Stakeholders noted growing recognition among local authorities that inclusive environmental actions deliver dual benefits: improved municipal service performance and enhanced community trust. Pilot activities in several municipalities under donor-supported projects have engaged Roma community members in waste sorting, clean-up, and recycling tasks. Although small in scale, these experiences demonstrate that Roma inclusion can be embedded within existing environmental frameworks when municipalities are provided with technical assistance, modest financial resources, and flexible contracting mechanisms.

Labour market trends also point to an expanding space for Roma participation. Serbia's construction and energy efficiency sectors face labour shortages, particularly in insulation, renovation, and solar installation works.[209] These are sectors where many Roma already possess relevant practical experience acquired through informal jobs in construction and waste recovery. Stakeholders agreed that targeted short-cycle training programmes could formalise these skills, improve safety standards, and support upward mobility.

Training institutions and employment agencies are increasingly aware of the need for green skills development, and several have piloted training modules on recycling and environmental maintenance. However, they rarely target Roma specifically. Expanding such schemes to include Roma participants through subsidised stipends, transport support, and local mediation could yield high impact. Interviewees underlined that green skills initiatives are most successful when outreach is proactive and learning formats are adapted to community contexts (e.g., on-site practical sessions, modular scheduling, or combined literacy and skills components).

Gender-responsive approaches also offer opportunity. Roma women's inclusion in waste sorting, community gardening, and energy saving campaigns has proven effective in awareness raising and income generation. Stakeholders emphasised that Roma women's participation can be scaled up by incorporating gender equality criteria in local green jobs programmes and supporting social enterprise models led by women's associations.

Data, funding, and coordination gaps

Despite clear opportunities, systemic gaps continue to hinder convergence between social inclusion and green transition policies.

Data fragmentation remains the most prominent challenge. Roma related data are collected by the Ministry for Human and Minority Rights and by municipalities through local action plans, yet these datasets are not connected to environmental or energy databases. As a result, there is no consolidated evidence base on Roma participation in green programmes, whether in energy retrofits, waste management, or circular economy employment. This absence of integrated monitoring prevents policymakers from identifying who benefits from environmental investments or from setting measurable inclusion targets.

Funding segmentation is another constraint. Roma inclusion programmes and green transition initiatives are financed through separate budget lines and donor mechanisms, often with distinct planning cycles and reporting formats.[210] Without joint financing frameworks or pooled resources, integrated interventions rely on ad-hoc project cooperation rather than systemic coordination. Stakeholders agreed that introducing inclusion related eligibility criteria into environmental grant schemes (for example, requiring social-benefit components or training quotas for vulnerable groups) could improve both equity and accountability.

Institutional cooperation between ministries also remains limited. The Ministry for Human and Minority Rights and the Ministry of Environmental Protection have distinct mandates and data systems, and no formal mechanism cur-

209 European Training Foundation. Green Skills Demand in the Western Balkans: Serbia Country Report 2024. Available at: https://www.etf.europa.eu/en/publications-and-resources/publications/green-skills-western-balkans-serbia.

210 World Bank. Second Serbia Green Transition Programmatic Development Policy Loan (DPL). Available at: https://documents.worldbank.org/en/publication/documents-reports/documentdetail/099021225165030305.

rently exists for inter-ministerial coordination on Roma participation in the green transition. The absence of a shared platform leads to duplication of efforts and weakens follow-up on cross-cutting commitments. Interviewees highlighted that coordination tends to occur only when external projects require it, making results highly dependent on donor timelines rather than policy continuity.

At the local level, **capacity and staffing gaps** persist. Many municipalities lack personnel trained to design or monitor socially inclusive environmental programmes. Roma coordinators and community mediators are rarely involved in environmental working groups, even though their participation could significantly improve outreach and communication. Stakeholders agreed that integrating Roma mediators as recognised partners in municipal environmental planning would enhance both the legitimacy and effectiveness of local green initiatives.

Emerging prospects

Even within this fragmented landscape, several trends point to growing alignment between Roma inclusion and the green transition. The forthcoming revision of the National Energy and Climate Plan is expected to introduce new social and employment indicators in line with EU Just Transition requirements. The development of Serbia's Green Jobs Action Plan, supported by the International Labour Organization, aims to identify skill needs in renewable energy, construction, and waste management, offering a practical entry point for Roma inclusion.[211]

Stakeholders noted that donor-supported projects have begun to embed social inclusion dimensions in green programming more consistently. For example, recent UNDP and EU initiatives on circular economy explicitly reference informal waste collectors integration and community level employment opportunities. These pilots illustrate that green transition and social inclusion objectives can be mutually reinforcing when policy design includes dedicated social impact targets.

Furthermore, Serbia's accession alignment with EU social policy frameworks and the introduction of the Social Scoreboard under the European Pillar of Social Rights create a broader context in which equality and Just Transition principles are increasingly mainstreamed across sectors.[212] This external alignment provides policy leverage to institutionalise Roma participation within the green transition agenda.

Interviewees across sectors agreed that the transition to a low-carbon and circular economy will succeed only if it is inclusive. Stakeholders consistently emphasised three preconditions for progress:

1. **Cross-sector coordination** between inclusion and environmental ministries, enabling joint planning, budgeting, and monitoring.

2. **Flexible eligibility and financing mechanisms,** allowing informal or low-income households to participate in energy and waste programmes through simplified documentation or community verification.

3. **Recognition of Roma mediators and organisations as partners,** ensuring that Roma voices inform the design, outreach, and evaluation of green transition initiatives.

4.6.5. Role of Roma communities and civil society in the green transition

Roma CSOs in Serbia have traditionally focused on human rights, education, employment, and social inclusion. Their engagement with environmental and green transition topics is relatively recent but steadily expanding. The increased visibility of climate, energy, and circular economy issues in public policy has opened new spaces for Roma organisations and mediators to link social inclusion with environmental action. Although the scale remains modest, collaboration between Roma CSOs, environmental NGOs, and local authorities is gaining recognition as an effective way to address both poverty and sustainability challenges.

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211 International Labour Organization. Promoting Green Jobs in Serbia – Policy Brief 2023. Available at: https://www.ilo.org/budapest/publications/WCMS_875694/lang--en/index.htm.

212 European Commission / DG EMPL. 2024 Social Scoreboard for the Western Balkans. Available at: https://commission.europa.eu/publications/social-scoreboard-western-balkans-2024_en.

Current role of Roma CSOs and community actors

Roma organisations across Serbia are beginning to integrate environmental themes into their ongoing inclusion work. Activities range from awareness raising on waste separation and clean-up campaigns to small-scale livelihood projects that combine income generation with recycling or reuse.[213] Stakeholders observed that these initiatives are most successful when they connect environmental objectives to tangible socio-economic benefits such as temporary employment, skill acquisition, or small stipends.

Some Roma associations have collaborated with donor-supported programmes under the *EU for the Green Agenda in Serbia* and related projects that promote circular economy practices. These pilots often engage Roma collectors and informal workers in organised waste sorting, contributing both to municipal service improvement and to livelihood security. Interviewees agreed that community interest in environmental activities is strong when participation generates visible income or enhances local reputation.

Mainstream environmental NGOs have also started involving Roma communities in their outreach and consultation work. Joint events on waste management, recycling, and energy efficiency increasingly include **mediators who facilitate communication between public institutions and marginalised groups**. Stakeholders highlighted that **such collaboration helps environmental organisations reach communities** that are otherwise excluded from decision-making processes.

Nevertheless, Roma CSOs remain underrepresented in central level or regional environmental policy dialogues. While Serbia's *Strategy for Social Inclusion of Roma 2022–2030* provides a clear framework for social participation, it only indirectly references environmental sustainability. Without dedicated financial lines for green activities, most Roma CSOs lack the resources to sustain environmental projects beyond short-term donor cycles.

Awareness, education, and engagement

Environmental awareness and education have become primary entry points for Roma engagement in Serbia's green transition. Local NGOs and community mediators organise workshops on waste separation, hygiene, energy saving, and recycling.[214] These sessions frequently target youth and women and are usually linked to small local initiatives such as settlement clean-ups or community gardens. Stakeholders emphasised that Roma youth respond positively to practical activities that combine learning with immediate economic or social benefits.

Several municipalities, supported by donor projects, have piloted short-term environmental public works schemes engaging Roma participants in waste collection, urban maintenance, and landscaping. These experiences demonstrate that when environmental measures are designed to include paid work, safety equipment, and training, participation and motivation increase markedly.

Stakeholders also pointed out the growing role of schools and community centres in introducing environmental topics. Inclusion of "green citizenship" content in adult-education and literacy programmes has proven effective in promoting behavioural change and linking environmental awareness with employability skills.

Roma women's groups are beginning to explore green livelihoods through community gardening, textile reuse, and small-scale recycling.[215] Interviewees underlined that integrating these initiatives with **vocational training, mentoring, or microfinance could create sustainable local enterprises.**

Capacity and partnership gaps

Despite increasing engagement, most Roma CSOs face substantial constraints in scaling up their green transition involvement. Many operate with limited staff, irregular funding, and little technical expertise in environmental fields.[216] Application procedures for environmental grants often require specialised knowledge, audited accounts, and co-fi-

213 Civil Society Network for Roma Inclusion (2024). Mapping of Roma CSOs and Their Engagement in Environmental and Green Transition Initiatives in Serbia. Available at: https://www.csnri-serbia.org/reports/roma-csos-green-transition-mapping.

214 UN Habitat / Ministry of Environmental Protection (2023). Community-Based Environmental Education Toolkit – Serbia. Available at: https://unhabitat.org/environmental-education-serbia-2023.

215 UNDP Serbia (2024). EU for the Green Agenda – Pilot Actions on Waste Management and Green Livelihoods. Available at: https://www.undp.org/serbia/projects/eu-green-agenda-serbia.

216 Civil Society Network for Roma Inclusion (2024). Mapping of Roma CSOs and Their Engagement in Environmental and Green Transition Initiatives in Serbia. Available at: https://www.csnri-serbia.org/reports/roma-csos-green-transition-mapping.

nancing, which small organisations cannot easily provide. Environmental NGOs, by contrast, usually have technical and administrative capacity but limited access to marginalised communities.

Stakeholders agreed that bridging this divide requires structured cooperation and mentoring between environmental NGOs and Roma CSOs. Partnerships that combine community access with technical expertise would strengthen both social impact and environmental outcomes. Some interviewees suggested that donor programmes could make such cooperation mandatory, requiring joint applications from social and environmental NGOs to ensure inclusive project design.

At the municipal level, coordination between Roma mediators and environmental departments remains ad hoc. Roma coordinators are rarely part of environmental working groups even though their participation could improve outreach, feedback, and trust. Stakeholders emphasised that formal recognition of mediators within municipal planning and monitoring structures would help institutionalise inclusion across green sectors.

Community perspectives and aspirations

Consultations with Roma community representatives reveal pragmatic attitudes toward the green transition. Many households associate environmental work with familiar occupations, such as waste collection, cleaning, and maintenance, but express a strong desire for formal recognition, stable income, and improved safety. Respondents noted that participation in environmental activities is appealing when it offers predictable wages and visible improvements in settlement conditions (for example, cleaner surroundings, lighting, or access to containers).

Roma youth appears to be interested in short, practical, and paid training programmes in areas such as waste sorting, recycling, and energy efficiency retrofits. Stakeholders reported that these preferences align with emerging labour market needs identified in green jobs assessments. Community members also underlined the importance of clear information and transparent recruitment processes; many are unaware of ongoing municipal or donor initiatives simply because outreach channels do not reach informal settlements.

Several interviewees highlighted that Roma families possess considerable practical knowledge about reuse and repair, skills that could be harnessed within circular economy projects. Formal recognition of such experience through mentoring or recognition-of-prior-learning mechanisms could help translate informal competencies into certified qualifications and employment opportunities.

Toward stronger Roma–green partnerships

Roma CSOs and mediators can serve as crucial intermediaries between institutions and communities in Serbia's green transition. Their networks and trust relationships are essential for mobilising participation, ensuring that environmental benefits reach marginalised groups, and improving the legitimacy of local sustainability initiatives. However, to play this role effectively, they require predictable funding, technical mentoring, and inclusion in planning and monitoring bodies.

Environmental NGOs and municipal authorities also stand to gain from collaboration with Roma organisations. Stakeholders agreed that partnerships with Roma CSOs enhance social outreach and increase the effectiveness of environmental actions. Projects implemented jointly have shown higher participation rates and better communication outcomes than those conducted solely by technical actors.

Moving forward, formalising these partnerships within central level and municipal frameworks could help institutionalise inclusion. The integration of Roma mediators into environmental planning under Serbia's National Energy and Climate Plan and Circular Economy Development Programme would operationalise social participation and accountability in its sustainability agenda.

Interviewees emphasised three priorities for strengthening Roma–green cooperation:

1. Establishing dedicated funding lines and technical assistance to enable Roma CSOs to engage in environmental projects.
2. Promoting joint programming between social and environmental actors at both central and municipal levels.
3. Embedding Roma representation and data tracking within environmental monitoring systems to demonstrate equitable outcomes.

4.6.6. Measures, models and recommendations

This section outlines practical measures and pilot models for strengthening Roma participation in Serbia's green transition. The recommendations respond to the structural, institutional, and socio-economic barriers identified in previous sections and are designed to align with Serbia's frameworks on energy, climate, and social inclusion. They combine policy level measures with operational models that can be implemented through central level programmes and municipal partnerships.

4.6.6.1. Summary of recommended measures

Policy and programme measures

- **Integrate Roma inclusion into energy, climate, and circular economy frameworks.** Roma participation should be mainstreamed within the National Energy and Climate Plan (2025–2030), the Circular Economy Development Programme (2022–2024), and related Green Agenda commitments. Targets for social participation and green employment should be included in implementation plans and annual monitoring reports.

- **Introduce an inclusive access mechanism for green subsidies.** Adapt eligibility criteria for household energy-retrofit and renewable energy schemes to enable participation of low-income and informally housed families, especially from Roma community and other vulnerable groups, using simplified procedures or community verification instead of property titles.

- **Strengthen municipal capacity for inclusive green delivery.** Equip municipalities with technical guidance, pre-defined templates, and small earmarked budgets for Roma-inclusive activities in areas such as waste management, local clean-ups, and housing retrofits.

- **Institutionalise Roma participation in local planning.** Formalise the role of Roma coordinators, community mediators, and CSO representatives in the development of LEAPs and energy efficiency programmes.

- **Establish a joint inclusion–green monitoring framework.** Introduce shared indicators that connect Roma inclusion targets with environmental and energy efficiency objectives to track participation and impact systematically.

- **Promote cross-sector partnerships.** Strengthen collaboration between ministries responsible for human rights, social affairs, and environment through inter-ministerial working groups and joint donor-funded projects focused on social inclusion in the green transition.

Operational and skills measures

- **Formalise Roma participation in municipal environmental services,** taking into account whether settlement conditions, legal requirements, and basic urban infrastructure allow for formalisation. In many contexts this includes skills certification and registration with the municipality or operating under a legal entity. Depending on regulations, formalisation may take the form of employment in public utility companies, participation in cooperatives or social enterprises, or individual registration as certified waste collectors. Contracting schemes or cooperatives for waste collection, sorting, and maintenance should be accompanied by proper occupational safety standards.

- **Establish a register of waste collectors, to be managed by the Agency for Waste Managment.**

- **Develop short-cycle training for green jobs.** Work with vocational training centres and employers to design modular courses in insulation, solar panel installation, recycling, and eco-maintenance, recognising prior informal experience. To ensure greater opportunities for the employment of Roma in green sectors, training initiatives should be complemented by subsidised employment opportunities through the Operational Plan for Employment.

- **Support inclusive green entrepreneurship.** Provide micro-grants, mentoring, and business formalisation support for Roma entrepreneurs in recycling, repair, and reuse services, as well as agriculture linking them to local government procurement. Implementation will require assessing legislative framework and how it regulates this area and ensuring that grants are tied to a functional social economy system, including tax benefits for workers in the sector and Employment Service's grant programmes.

- **Envisage benefits for local self-governments that support social entrepreneurship contributing to just green transition.**

- **Promote gender and youth participation.** Design targeted measures to support Roma women and youth in green sectors, including stipends, flexible learning schedules, childcare, and on-site training.

- **Create pathways for Roma employment in public utilities and municipal green services.** Develop structured training and employment schemes that allow Roma to enter jobs in maintenance, landscaping, recycling, and public sanitation under fair and safe conditions.

- **Enable public companies to contract waste collectors or their social enterprises.**

- **Expand training for green jobs through VET centres.** Develop modular short courses (80–120 hours) in solar panel installation, energy retrofitting, and recycling logistics, with recognition of prior informal experience.

- **Encourage regional and peer learning.** Encourage exchange between municipalities, Roma CSOs, and environmental actors through central level and regional learning networks under the Green Agenda for the Western Balkans.

Expected benefits

- **Economic:** Enhanced access to formal employment, new local jobs in green sectors (recycling, agri-businesses, constructions), and reduced dependence on informal activities.

- **Social:** Stronger community participation, safer and more stable livelihoods, and reduced exclusion.

- **Environmental:** Improved municipal waste performance, higher recycling rates, and contributions to Serbia's energy efficiency and decarbonisation targets.

4.6.6.2. Pilot models for implementation

SERBIA - Pilot measures

Pilot 1	Roma Green Utility Partnership

Objective:
Integrate Roma workers into public-utility and municipal green services through structured training

Rationale:
Serbia's network of public-utility companies (PUCs) employs more than 80,000 people nationwide. Many local utilities face labour shortages, particularly in waste management, maintenance of green areas, and recycling. Engaging Roma would address both workforce needs and social inclusion objectives.

Target group:
Roma adults currently working informally in waste collection, street cleaning, and maintenance.

Partners:
Municipalities, PUCs, VET centres, Employment Service, Roma CSOs.

Core activities:
Mapping of potential workers, occupational-safety training, onboarding in municipal cleaning and landscaping teams, provision of personal protective equipment, and mentorship by senior employees.

Indicative budget: €300,000–€450,000 for pilot implementation in three municipalities.

Key indicators:
• Number of Roma formally employed,
• retention after 12 months,
• incidents reduced,
• and share of women employed.

⚠ ✅ **Risks and mitigation:**

Reluctance of public operators—addressed through local incentives and recognition under CSR or Green Agenda funding.

Pilot 2 — Energy Retrofit Inclusion Tracks

Objective:
Equip Roma jobseekers with practical skills in energy-efficiency retrofitting and renewable-energy maintenance.

Rationale:
Serbia's building sector will be a major driver of green jobs in coming years, supported by EIB, EU, and programmes from the budget. Roma workers have relevant experience in construction and renovation but lack certification.

Target group:
Roma youth (18–35), low-qualified adults, and NEETs.

Partners:
Vocational-training institutions, certified contractors, Employment Service, local governments.

Core activities:
Development of modular training courses (insulation, carpentry, plastering, solar-panel installation), practical internships, and recognition-of-prior-learning assessments. To make the training meaningful, practical workplace experience must be secured, requiring close collaboration with private-sector employers who can host trainees and shape relevant competencies.

Indicative budget:
€250,000–€400,000 for 150 trainees.

Key indicators:
• Certification rate,
• employment placement,
• income stability after six months.

Risks and mitigation:

Employer hesitation—mitigated through co-design of curricula and wage subsidies for inclusive hiring.

Pilot 3 — Agro-Solar Greenhouse Model

Objective:
Combine Roma employment in agro-processing and greenhouse farming with small-scale renewable-energy use.

Rationale:
Agricultural regions in Vojvodina and southern Serbia face seasonal labour shortages and rising energy costs. Integrating solar-powered irrigation and heating systems offers an opportunity for Roma employment and sustainable production.

Target group:
Roma workers in rural or peri-urban settlements near agricultural hubs.

Partners:
Agricultural cooperatives, VET schools, local farmers' associations, and municipalities.

Core activities:
Construction of small solar-assisted greenhouses, training in maintenance and organic production, and seasonal employment contracts linked to local markets.

Indicative budget: €250,000–€350,000 for three pilot sites.

Key indicators: • Number of Roma trained, • employment duration, • yield improvement, • CO_2 savings.

Risks and mitigation:

Weather and market risks—mitigated through diversification of crops and cooperative risk-sharing. Exploitative practices in agro-processing (conduct employer due diligence; require written contracts, fair wages, and provision of health insurance as conditions for participation).

4.6.6.3. Monitoring, evaluation and regional learning

Governance: Assign clear institutional roles to the Ministry for Human and Minority Rights and the Ministry of Environmental Protection for coordinating Roma-inclusive green measures, supported by a joint technical secretariat.

Data systems: Link Roma-inclusion monitoring (under the 2022–2030 Strategy) with energy and climate databases to track participation, employment, and environmental impact.

Frequency: Collect quarterly progress data from municipalities and compile annual summaries evaluating employment retention, training outcomes, and environmental results.

Learning cycle: Conduct baseline, mid-term, and endline evaluations to assess progress and replicate successful pilots in additional regions.

Regional dimension: Serbia should actively engage in regional peer exchange under the Green Agenda for the Western Balkans, Energy Community Just Transition Platform, and Council of Europe Roma Integration – Phase III Programme. Annual regional reviews could benchmark Roma participation in green measures, supporting evidence-based policy learning across the Western Balkans.

4.7. Türkiye

TÜRKİYE
Beneficiary's dashboard

1. Spatial pattern of Roma settlements

Roma are concentrated mainly in western regions (Marmara, Aegean), Dom communities in the south-east, Lom in the north-east, and Abdals are dispersed in small towns and villages across central, southern and eastern Anatolia, often in poor housing and environmentally exposed locations.

2. Key numbers panel

Population:
No official ethnic statistics

Socio-economic profile:
Persistent poverty & housing insecurity

Work pattern:
Strong presence in **informal recycling**

Economic loss of exclusion:
Not quantified (no ethnicity-disaggregated data)

3. Policy snapshot box

Roma inclusion plan: Roma Citizens Strategy Document and Action Plan (2023–2030)

Green / NECP: Large recycling market; evolving green policies

Explicit Roma–green link: No

4. Challenges and opportunities

Main barriers:

- dangerous informal work;
- weak social protection;
- ethnic invisibility in data

Main opportunities:

- large circular-economy value chains;
- ESG pressure for inclusion

Flagship initiatives:

- Roma-inclusive circular-economy formalisation;
- targeted Abdal outreach

The following section presents findings for Türkiye, outlining the policy context, key challenges, and opportunities for linking Roma inclusion with the country's green transition agenda.

4.7.1. Overview of Roma population and Roma inclusion and green-policies context

This subsection provides an overview of Roma (including Rom, Dom, Lom and Abdal) in Türkiye, highlighting demographic characteristics, socio-economic conditions, and key challenges in accessing education, employment, and public services. It also reviews the Türkiye context for Roma inclusion and the broader green transition, including relevant strategies and programmes. Together, this situates the Türkiye-specific analysis within both the population realities and the policy environment shaping Roma participation in the green transition.

Türkiye does not collect ethnicity in the population census; consequently, reliable official figures for Roma, Dom and Lom are unavailable. Scholarly and NGO syntheses identify three principal groups[217] : Rom (predominantly western regions), Dom (south-east) and Lom (north-east), with considerable internal diversity and widespread settlement (the vast majority being sedentary), alongside recurrent undercounting due to stigma and data gaps.[218] In urban areas, many Roma/related families reside in neighbourhoods marked by tenure insecurity or informal housing, which compounds socio-economic exclusion and environmental risk exposure.[219]

In addition to Rom, Dom and Lom populations, Türkiye is home to Abdal communities—Turkish-speaking groups with a long history of itinerant music, craft-making and seasonal labour. Abdals are socio-economically vulnerable and often experience similar forms of exclusion to Roma groups, although they do not fall under Roma policy categories. Their settlements are small and geographically scattered across central, southern and eastern Anatolia, and due to stigma and identity hiding, they remain largely invisible in official statistics and inclusion programmes.[220]

Cross-cutting evidence describes persistent poverty, low and irregular employment, and discrimination in access to services. Schooling barriers (costs, distance, stigma) translate into weaker labour market attachment; health and housing deprivations are commonly reported.[221] Human rights monitoring over several years documents vulnerabilities linked to insecure tenure and displacement pressures, which directly affect eligibility for social and infrastructure programmes.

A visible share of Roma/related workers participates—alongside non-Roma informal workers—in collection and sorting of recyclables in major cities. Studies on informal waste collecting in Türkiye note a high degree of informality, hazardous working conditions, weak social protection, and limited interfaces with formal municipal systems; at the same time, these workers underpin material recovery streams that feed recycling markets.[222] This embedded but informal experience forms a practical bridge toward circular economy roles (materials recovery facilities, buy-back/aggregation points, certified sorting and logistics) if pathways for safe formalisation are created.

Türkiye has significantly accelerated its climate and energy policy architecture. In April 2023, it updated its Nationally Determined Contribution (NDC), targeting a **41% reduction versus business-as-usual by 2030;** in 2024 it published a **Long-Term Climate Strategy** confirming the **net-zero 2053** goal and outlining governance and sectoral pathways.[223] [224] **The National Energy Plan to 2035** foresees large scale expansion of renewables and grids, with multiple analyses projecting substantial growth in wind/solar capacity and associated employment.[225] Complementary meas-ures include the **Green Deal Action Plan** (trade/industry/energy alignment with EU Green Deal), and the **Zero Waste (Sıfır Atık)** programme scaling waste prevention, separation and recycling across municipalities.

217 Minority Rights Group International. Roma in Türkiye (country/community profile). Available at: https://minorityrights.org/communities/roma-17/.

218 Minority Rights Group International. Problems Faced by Roma in Turkey Regarding Access to Education and Housing (submission; Roma, Dom, Lom overview). Available at: https://minorityrights.org/app/uploads/2024/01/roma-in-turkey-for-osce-26-sep-2.pdf.

219 Ibid.

220 Marsh, A. (2005). "Gypsies and Alevis: the impossibility of Abdal identity" in Markussen H. (ed.) Alevis and Alevism: Transformed Identities. ISIS Press; Yıldırım, R. (2016). "Abdalların Sosyo-Kültürel Yapısı (Anamur Örneği)", Dergipark; ERIAC (2021). Abdal Communities in Turkey: Cultural Identity and Marginalisation; Başbakanlık Aile ve Sosyal Araştırmalar Genel Müdürlüğü (various reports referencing Abdal communities).

221 Minority Rights Group International. Roma in Türkiye (https://minorityrights.org/communities/roma-17/) , Minority Rights Group International. Problems Faced by Roma in Turkey Regarding Access to Education and Housing (submission; Roma, Dom, Lom overview), https://minorityrights.org/app/uploads/2024/01/roma-in-turkey-for-osce-26-sep-2.pdf.

222 Sorkun, M.F. (2025). The role of waste pickers in individual waste separation behaviour (Turkey context). Available at: https://pubmed.ncbi.nlm.nih.gov/39626390/.

223 Republic of Türkiye (UNFCCC), Updated 1st Nationally Determined Contribution (13 Apr 2023). Available at: https://unfccc.int/sites/default/files/NDC/2023-04/T%C3%9CRK%C4%B0YE_UPDATED%201st%20NDC_EN.pdf.

224 Republic of Türkiye (UNFCCC). Türkiye's 2053 Long-Term Climate Strategy (Mar 2024). Available at: https://unfccc.int/sites/default/files/resource/Turkiye_Long_Term_Climate_Strategy.pdf.

225 Climate Policy Database / Enerdata / Ministry materials on National Energy Plan to 2035 (renewables scale-up). Available at: https://climatepolicydatabase.org/policies/national-energy-plan-2023-2035.

The Zero Waste roll-out, municipal waste system upgrades, and renewable/efficiency investments together create potential entry points for Roma/related communities—especially where informal recycling experience is present. Where programme access depends on formal documentation (e.g., ownership or registered address) or lacks outreach into informal settlements, exclusion risks persist. Aligning inclusion measures (recognition of prior learning, safety training, simplified eligibility, and contracting/cooperative models) with circular economy and energy efficiency delivery could convert existing informal competences into safer, formal green jobs while improving service performance.[226]

Türkiye's policy trajectory (energy plan, Green Deal Action Plan, Zero Waste) provides a robust framework for green investments and municipal reforms; Roma/related groups bring practical experience from informal circular economy niches but face structural barriers in housing, documentation, and certification. The Beneficiary-specific analysis therefore focuses on (i) where inclusion can be mainstreamed in waste and energy efficiency programmes, (ii) which delivery mechanisms (municipal contracts, cooperatives, buy-back points, short-cycle training with recognition of prior learning) realistically translate into formal opportunities, and (iii) how monitoring can track participation and outcomes for Roma within Türkiye's green transition.[227]

4.7.2. Policy and Institutional Framework for Roma Inclusion and the green transition

Türkiye has established advanced frameworks in both Roma inclusion and environmental sustainability, but these two policy domains largely evolve along separate lines. While Roma inclusion is addressed primarily through human rights and social policy instruments, the green transition is being driven by energy and environmental reforms linked to the EU Green Deal and domestic climate commitments. Coordination mechanisms between these frameworks remain limited, though recent policy developments open opportunities for convergence.

Institutional framework for Roma inclusion

Roma inclusion in Türkiye falls under the broad umbrella of social cohesion and anti-discrimination policy. The Ministry of Family and Social Services and local social assistance directorates implement programmes targeting vulnerable groups, including Roma, Dom and Lom communities, focusing on housing, education, employment, and health. The *National Human Rights and Equality Institution of Türkiye* provides the principal mechanism for monitoring discrimination and equal treatment complaints, while several metropolitan municipalities (notably in western and southern Türkiye) have created social cohesion units that deliver community mediation and social support programmes.

Roma civil society organisations play a key complementary role, providing outreach, informal education, and advocacy.[228] In recent years, their visibility has increased through stronger engagement with local authorities and community institutions, particularly in areas such as access to rights, education support, and social services. These collaborations have helped build trust and expand the reach of public programmes, though civil society efforts continue to rely heavily on short-term donor funding rather than stable support from the budget of Türkiye.[229]

Institutional framework for the green transition

Türkiye's environmental and climate governance has expanded rapidly over the past decade. The *Green Deal Action Plan (2021),* anchored in Presidential Circular 2021/15, sets out 32 objectives across trade, industry, energy, and environment to align Türkiye's economy with EU Green Deal principles.[230] The *Updated Nationally Determined Contribution (2023)* commits to reducing greenhouse gas emissions by 41% by 2030 compared with a business-as-usual trajectory, while the *Long-Term Climate Strategy (2024)* confirms the 2053 net-zero goal.[231]

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226 ScienceDirect article abstract (waste pickers & separation behaviour, TR context). Available at: https://www.sciencedirect.com/science/article/abs/pii/S0301479724034911.

227 Türkiye's Green Deal/Zero Waste implementation material (EN brief). Available https://webdosya.csb.gov.tr/db/dongusel_en/icerikler/european-green-deal-and-turk-yes-green-deal-act-on-plan-20241017142935.pdf.

228 NGOization, politicization and polarization of Roma civil society in Turkey — P. Sayan & Ş. Duygulu (2022). Available at: https://www.researchgate.net/publication/358981299_NGOization_politicization_and_polarization_of_Roma_civil_society_in_Turkey.

229 Ibid.

230 Republic of Türkiye. Green Deal Action Plan (Presidential Circular No. 2021/15). Available at: https://climate-laws.org/document/green-deal-action-plan-approved-by-presidential-circular-2021-15_946c.

231 Republic of Türkiye (UNFCCC). Türkiye's 2053 Long-Term Climate Strategy, March 2024. Available at: https://unfccc.int/sites/default/files/resource/Turkiye_Long_Term_Climate_Strategy.pdf.

The *National Energy Plan (to 2035)* and the *Energy Efficiency Strategy and Action Plan* provide operational tools for implementing these goals. They prioritise renewable energy deployment, energy-retrofit programmes, and circular economy measures, coordinated by the Ministry of Energy and Natural Resources and the Ministry of Environment, Urbanisation and Climate Change. *The Zero Waste (Sıfır Atık)* initiative, led by the same ministry, has become the flagship programme for municipal waste management, emphasising reduction, sorting, and recycling.[232]

Coordination between inclusion and green frameworks

Despite their common sustainability objectives, Roma inclusion and green transition policies currently function in parallel. The social policy system does not explicitly reference environmental inclusion, and environmental programmes lack social or ethnic-disaggregation indicators. Stakeholders agreed that municipal level alignment is the most feasible entry point: cities are required to prepare both LEAPs and Social Inclusion Action Plans, yet these are drafted independently. In practice, inclusion components within environmental projects are limited to temporary employment under public-works or clean-up campaigns.

Some positive precedents are emerging. Under the *Zero Waste programme[233]*, several municipalities have involved Roma waste collectors and community representatives in local awareness campaigns, neighbourhood-level sorting activities, and public clean-up initiatives. Although limited in scale, these pilots demonstrate that waste management reforms can be linked with social inclusion objectives when municipalities engage directly with marginalised communities. In parallel, Türkiye's industrial green transition efforts, most notably the Türkiye Green Industry Project implemented by the Ministry of Industry and Technology, Small and Medium Enterprises Development Organization of Türkiye (KOSGEB), and The Scientific and Technological Research Council of Türkiye, are accelerating cleaner production, resource efficiency upgrades, and circular economy practices among SMEs. While the project does not yet include social inclusion components, its expansion into community outreach or supply-chain partnerships could create future entry points for Roma workers and micro-entrepreneurs involved in repair, reuse, and material-recovery activities.[234]

4.7.3. Barriers and access to green opportunities

This section examines the principal structural, socio-economic, and institutional barriers affecting Roma, Dom, and Lom participation in Türkiye's emerging green transition, as well as entry points that could enable greater inclusion. The analysis combines available policy and research evidence with stakeholder insights gathered for this study.

Structural and socio-economic barriers

Socio-spatial segregation and insecure housing conditions continue to constrain participation in green and energy efficiency measures. Many Roma and Dom families reside in informal or substandard settlements—often near industrial zones or waste collection points—where property rights are undocumented.[235] Energy efficiency or building-retrofit programmes financed under the Energy Efficiency Strategy and Action Plan or municipal Zero Waste budgets typically require ownership certificates and co-financing, automatically excluding households without legal tenure. These formal prerequisites create de facto exclusion from subsidies for insulation, clean heating, or renewable energy equipment.[236]

Limited and unstable access to utilities further compounds exclusion. Households without regular electricity or water supply cannot qualify for metering-based energy-saving incentives. Interviewees agreed that addressing "green poverty" in such areas first requires ensuring reliable infrastructure and service access, otherwise sustainability goals remain abstract to the most affected communities.

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232 Ministry of Environment, Urbanisation and Climate Change. Zero Waste (Sıfır Atık) National Programme Overview. Available at: https://sifiratik.gov.tr/.

233 Ministry of Environment, Urbanisation and Climate Change (MoEUCC), Zero Waste Project Overview, https://sifiratik.gov.tr/

234 KOSGEB official documentation (Green Industry Support Programme), https://webdosya.kosgeb.gov.tr/Content/Upload/Dosya/YE%C5%9E%C4%B0L%20SANAY%C4%B0%20DP/2023.12.14_DUYURU/Sat%C4%B1n_Alma_Uzman%C4%B1_Teknik_%C5%9Eartnamesi.pdf.

235 Minority Rights Group International (2024). Problems Faced by Roma in Turkey Regarding Access to Education and Housing. Available at: https://minorityrights.org/app/uploads/2024/01/roma-in-turkey-for-osce-26-sep-2.pdf.

236 Ibid.

Education, skills, and labour market barriers

Educational attainment among Roma, Dom, and Lom communities remains below the Türkiye average, constraining access to emerging green economy occupations.[237] Many young Roma leave school early or experience irregular attendance, limiting their pathways into certified vocational education and training (VET) programmes. Türkiye's recent VET reforms under the National Implementation Plan for the Osnabrück Declaration emphasise modular and practice-oriented training, including emerging green and digital skills. However, these initiatives are not accompanied by targeted outreach or financial-support mechanisms, making participation difficult for disadvantaged learners, including Roma.[238]

A considerable number of Roma men and women already possess practical experience in construction, maintenance, and informal waste collection.[239] Stakeholders emphasised that this know-how could be formalised through recognition-of-prior-learning mechanisms and modular short-cycle training (80–120 hours). However, the current certification system seldom recognises informal experience; consequently, Roma workers remain confined to precarious informal activities rather than progressing into certified employment.

Gender disparities reinforce these obstacles. Roma women, particularly in southern and south-eastern provinces, face mobility restrictions, care responsibilities, and social stigma that limit participation in training or green jobs. NGOs working on women's economic empowerment noted that flexible schedules, transport support, and childcare provision substantially increase female participation, but such measures remain exceptional.

Institutional and administrative barriers

Fragmented governance continues to hinder the integration of inclusion objectives into green transition frameworks. The Ministry of Family and Social Services manages social programmes, while the Ministry of Environment, Urbanisation and Climate Change and the Ministry of Energy and Natural Resources oversee environmental and energy agendas. There is no shared coordination platform or joint data-collection system connecting Roma inclusion with environmental outcomes.[240]

Administrative complexity further limits access. Most budget and donor-funded energy programmes require identity registration, proof of residence, and co-financing contributions—conditions that informal households cannot meet. Interviewees highlighted that without simplified eligibility or community-based verification, these mechanisms effectively exclude the poorest. Municipalities also lack dedicated staff or budget lines for inclusive implementation of Zero Waste or energy efficiency actions, leaving civil-society organisations to fill operational gaps on an ad hoc basis.

Emerging opportunities

Despite these barriers, several entry points are becoming visible. Stakeholders identified an expanding shortage of semi-skilled labour in construction, building retrofitting, and renewable energy installation—sectors that align closely with Roma workers' informal skills base. The National Energy Plan to 2035 and forthcoming National Energy and Climate Plan introduce social-impact indicators consistent with Just Transition principles, offering a potential framework for inclusive employment targets. Likewise, the Zero Waste initiative continues to create municipal-level opportunities for formalising waste sorting and collection activities through contracting or cooperatives.

Environmental NGOs and Roma organisations have started experimenting with small joint pilots (community cleanups, recycling workshops, and awareness campaigns) which demonstrate how inclusion and sustainability can be mutually reinforcing. Interviewees underlined that scaling up these pilots will require stable funding and formal recognition of Roma mediators as partners in municipal environmental planning.

237 Kılıçoğlu, G., & Yılmaz Kılıçoğlu, D. (2018). The Romany States of Education in Turkey: A Qualitative Study. Urban Review, 50, 402–429, available at: https://www.researchgate.net/publication/322209174_The_Romany_States_of_Education_in_Turkey_A_Qualitative_Study.

238 Turkey National Implementation Plan for the Osnabrück Declaration, available at: https://employment-social-affairs.ec.europa.eu/policies-and-activities/skills-and-qualifications/skills-jobs/vocational-education-and-training-vet/national-implementation-plans_en.

239 Sorkun, M.F. (2025). The Role of Waste Pickers in Individual Waste Separation Behaviour. Available at: https://pubmed.ncbi.nlm.nih.gov/39626390/.

240 Republic of Türkiye (2024). Long-Term Climate Strategy 2053. https://unfccc.int/sites/default/files/resource/Turkiye_Long_Term_Climate_Strategy.pdf.

Overall, progress will depend on three enabling conditions:

1. **Institutional willingness** to integrate social and environmental agendas across ministries;

2. **Regulatory adaptation** to allow informal households access to energy and waste management programmes;

3. **Recognition of Roma mediators and CSOs** as legitimate partners in local planning, implementation, and monitoring.

4.7.4. Opportunities and gaps

Türkiye is entering a stage where both Roma inclusion and the green transition are increasingly visible in policy, yet the two agendas continue to develop largely in isolation. This section identifies key opportunities for connecting these processes, as well as structural and institutional gaps that limit Roma participation in the shift toward a low-carbon and circular economy.

Institutional and policy opportunities

Türkiye's *Green Deal Action Plan (2021)*[241] and Climate Change Adaptation Strategy and Action Plan *(2024)*[242] provide a coherent framework for decarbonisation, energy transition, and circular economy. However, these environmental and climate-policy documents do not yet integrate social inclusion dimensions or explicitly reference Roma or other vulnerable groups. As a result, Roma inclusion remains addressed primarily through broader social policy instruments, while links to green transition delivery lines, such as energy efficiency schemes, circular economy initiatives, or Just Transition measures, are still at an early stage. This gap limits the potential to connect Türkiye's green transition agenda with inclusive, community level benefits.

Stakeholders agreed that the preparation of Türkiye's forthcoming *National Energy and Climate Plan* offers an opportunity to integrate social and employment dimensions consistent with EU Just Transition principles. In practice, this could involve collecting disaggregated data on training and job creation, and introducing Roma-sensitive targets for local employment within energy efficiency and recycling programmes. Such an approach would demonstrate that the benefits of the green transition are being distributed fairly across communities.

Municipalities already implement overlapping planning instruments—LEAPs, Sustainable Urban Mobility Plans, and local social inclusion strategies. Their next revision cycles could explicitly include Roma participation in community awareness, energy saving campaigns, and circular economy pilots. Stakeholders underlined that municipal-level alignment is the most realistic entry point, as many Roma and Dom communities already engage informally in waste management, maintenance, and repair activities that can be formalised through small contracts or cooperatives.

Local level and labour market opportunities

The labour market perspective is especially promising. The National Energy Plan to 2035 projects the creation of tens of thousands of jobs in energy efficiency retrofitting, solar installation, and construction. Many of these positions require short-cycle technical skills that could be developed through targeted VET modules and recognition of prior learning. Interviewees observed that practical on-the-job training supported by stipends and local mentors would be effective for Roma youth and NEETs, who often lack resources for longer courses.

Existing informal recycling and repair practices among Roma and Dom workers also represent an underutilised asset for Türkiye's circular economy ambitions. Interviewees emphasised that formalising these activities, through registration support, safety training, and cooperative arrangements, could simultaneously improve livelihoods and municipal recycling performance.

241 Republic of Türkiye (2021). Green Deal Action Plan (Presidential Circular No. 2021/15). Available at: https://climate-laws.org/document/green-deal-action-plan-approved-by-presidential-circular-2021-15_946c.

242 Republic of Türkiye (2024). Long-Term Climate Strategy 2053 (available at: https://unfccc.int/sites/default/files/resource/Turkiye_Long_Term_Climate_Strategy.pdf) and National Energy Plan (available at: https://enerji.gov.tr/Media/Dizin/EIGM/tr/Raporlar/TUEP/T%C3%BCrkiye_National_Energy_Plan.pdf).

Data, funding, and coordination gaps

Despite these opportunities, several systemic constraints persist. First, **data fragmentation:** Roma related information collected by social ministries and municipalities is not linked with environmental databases. This prevents tracking how many Roma households or workers benefit from green transition programmes.

Second, **funding segmentation:** Roma inclusion actions are financed through social or equality budgets, while environmental programmes are funded separately through energy, climate, or municipal infrastructure lines. Stakeholders agreed that this division leads to duplication and reduces efficiency. A shared funding mechanism or cross-ministerial working group could enable joint programming and monitoring.

Third, **limited coordination:** there is no permanent institutional body linking Roma inclusion and green transition. Cooperation tends to occur only within donor projects, without long-term continuity once funding ends.

Emerging prospects

Even within this fragmented landscape, there are signs of policy convergence. The forthcoming *National Energy and Climate Plan* explicitly mentions social and employment indicators, while Türkiye's participation in EU Green-Deal alignment dialogues encourages greater attention to Just Transition principles. The *Zero Waste* programme continues to scale across Türkiye, offering a practical platform for inclusive municipal recycling.[243] As several stakeholders noted, embedding Roma mediators and CSO representatives into these processes would not only improve outreach but also ensure that the transition remains socially just.

If coordinated action is taken to link inclusion and green agendas—through data integration, flexible eligibility rules, and institutional partnerships, Türkiye could position itself as a regional example of equitable green transformation, turning existing informal skills and networks into pathways for decent, safe, and sustainable employment.

4.7.5. Role of Roma communities and civil society in the green transition

Roma, Dom, and Lom CSOs in Türkiye have traditionally focused on social inclusion, education, and human rights advocacy. In recent years, however, a gradual expansion toward environmental and green transition themes has begun to emerge. Although the scale of engagement remains modest, collaboration between Roma CSOs, environmental NGOs, and local authorities is strengthening recognition that environmental and social vulnerabilities are interconnected, especially in neighbourhoods facing pollution, poor infrastructure, and exposure to climate risks.

Current role of Roma CSOs and community actors

Roma and Dom organisations at the local level have started incorporating environmental aspects into their inclusion activities. Initiatives supported through small grant schemes have included components on waste management, urban clean-up, and awareness on recycling and hygiene.[244] Interviewees confirmed that these small-scale activities often begin as project add-ons but attract strong community participation, particularly when they generate modest but direct income.

At the same time, several mainstream environmental NGOs, such as those active in climate awareness and waste management campaigns, have begun reaching out to vulnerable communities, including Roma neighbourhoods, through inclusive workshops and local campaigns. Stakeholders observed that this form of cooperation, though still sporadic, marks a shift from charity based approaches toward partnerships built on shared environmental responsibility.

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243 Ministry of Environment, Urbanisation and Climate Change (2024). Zero Waste (Sıfır Atık) Programme – Annual Progress Report. Available at: http://www.zerowaste.gov.tr/.

244 Examples include: https://www2.fundsforngos.org/latest-funds-for-ngos/applications-open-for-zero-waste-grant-programme-in-tureky/.

Awareness, education, and engagement

Environmental awareness and education are emerging as effective entry points for Roma participation in Türkiye's green agenda. Local CSOs and youth groups have implemented community workshops on recycling, water saving, and energy efficiency, often led by trained mediators or teachers from within the Roma community.[245] Interviewees agreed that engagement improves significantly when such activities include stipends or short-term municipal contracts, linking environmental goals with livelihood opportunities.

Women's associations within Roma and Dom communities have also shown interest in small-scale "green livelihood" projects, such as textile reuse, community gardening, and household recycling. These projects not only enhance local environmental conditions but also strengthen women's participation in community decision-making. Stakeholders noted that integrating these initiatives with formal training or microfinance mechanisms would help them evolve from temporary projects into sustainable income sources.

Capacity and partnership gaps

Despite the growing engagement, Roma CSOs face major structural constraints. Most lack the administrative or technical capacity to apply for environmental funding or to meet reporting requirements of larger programmes. Conversely, environmental NGOs often possess technical expertise but limited access to marginalised communities. Stakeholders emphasised that structured mentoring and pairing Roma CSOs with established environmental organisations, would bridge this gap and enhance the social legitimacy of environmental projects.

Another recurring challenge is funding continuity. Many pilot initiatives depend on short-term donor grants and dissolve once financing ends. Interviewees agreed that municipalities could play a stabilising role by contracting Roma CSOs for recurring environmental services such as neighbourhood clean-ups, awareness events, or data collection for Zero Waste activities.

Community perspectives and aspirations

Consultations with community representatives indicate pragmatic attitudes toward environmental participation. Roma and Dom households tend to associate "green work" with familiar occupations (waste collection, cleaning, maintenance, repair) but express a desire for formal recognition, safer conditions, and predictable pay. Women and youth participants often prioritise short, local, paid activities that blend environmental learning with visible neighbourhood benefits, such as cleaner surroundings and reduced waste.

Interviewees underlined that trust and communication are essential: families engage more readily when environmental initiatives are presented as joint efforts that respect community experience rather than external interventions. Recognising existing know-how in reuse, repair, and recycling through local certification or recognition-of-prior-learning schemes could further strengthen participation.

Toward stronger Roma–green partnerships

Roma and Dom CSOs can serve as key intermediaries between communities and institutions in Türkiye's green transition. Their grassroots networks and trust relationships are essential for effective outreach, participatory planning, and monitoring of local environmental actions. To fulfil this role sustainably, they require predictable institutional support: access to funding, inclusion in municipal advisory councils, and opportunities to collaborate on project design and evaluation.

Environmental NGOs, in turn, can benefit from cooperation with Roma organisations, which provides social insight and legitimacy in communities where technical projects might otherwise face resistance. Stakeholders agreed that embedding such partnerships in the implementation of the Zero Waste programme, the upcoming National Energy and Climate Plan, and municipal environmental plans would operationalise inclusion while improving accountability and long-term outcomes.

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245 Ministry of Environment, Urbanisation and Climate Change (2024). Zero Waste (Sıfır Atık) National Programme – Community Engagement Initiatives. Available at: http://www.zerowaste.gov.tr/.

4.7.6. Measures, models and recommendations

This section outlines practical measures and pilot models for strengthening Roma, Dom, and Lom participation in Türkiye's green transition. The recommendations build on the barriers and opportunities identified in the previous sections and align with ongoing strategies, including the Green Deal Action Plan, Zero Waste Programme, and the forthcoming National Energy and Climate Plan). They combine policy-level guidance with operational concepts feasible within Türkiye's institutional framework.

4.7.6.1. Summary of recommended measures

Policy and programme measures

- **Integrate social inclusion into climate and energy frameworks.** Embed Roma, Dom, and Lom participation indicators into the National Energy and Climate Plan, Long-Term Climate Strategy, and Zero Waste monitoring frameworks. Ensure that data on vulnerable groups are systematically collected and disaggregated.

- **Establish social access windows in energy efficiency and circular economy programmes.** Adapt eligibility criteria to include households lacking formal tenure through proxy-means testing, community-based verification, and partnerships with CSOs. Existing municipal energy efficiency subsidy schemes should be adapted to ensure they reach Roma and other vulnerable households. This can be achieved through targeted programmes designed specifically for these groups or by introducing quota-based mechanisms within general programmes to guarantee their participation.

- **Develop municipal inclusion guidelines.** Issue practical manuals and small budget lines enabling municipalities to deliver inclusive green measures, especially in local waste management, retrofitting, and recycling.

- Institutionalise Roma mediator roles. Recognise trained community mediators and CSO representatives as formal partners in environmental planning, local monitoring, and public consultations under the Zero Waste and National Energy and Climate Plan frameworks.

- **Foster coordination between ministries.** Establish a joint working group between the Ministry of Family and Social Services and the Ministry of Environment, Urbanisation and Climate Change to synchronise social inclusion with climate and energy policies.

Operational and skills measures

- **Strengthen pathways for the formal inclusion of Roma in waste and circular economy services.** This requires first determining whether the legal, infrastructural, and settlement conditions enable a shift from informal to formal work. In many systems, formal engagement depends on meeting certification requirements and securing either municipal registration or affiliation with a legally recognised entity. Accordingly, Roma workers may be integrated through public utility companies, organised into social enterprises or cooperatives, or authorised as individually registered collectors. Pilot schemes for waste sorting, street cleaning, the collection of recyclable materials, and repair/reuse services should incorporate these pathways and ensure adequate safety training.

- **Launch modular green skills programmes.** Partner with VET centres and private contractors to provide 80–120-hour short courses on insulation, solar installation, waste sorting, and materials recovery, combined with recognition of prior learning. By connecting these trainings with subsidised employment schemes under the Operational Plan for Employment, Roma will have easier transition into jobs in the green sector.

- **Support inclusive micro-entrepreneurship.** Offer micro-grants (€1,500–€3,000), mentoring, and compliance assistance for Roma-led initiatives in repair, reuse, or recycling, as well as other types of green entrepreneurial initiatives, and link them to municipal procurement schemes. Before introducing such grants, legal framework must be reviewed, and the measure should be embedded within a support system for social enterprises that offers tax deductions for sector workers and provides grant schemes through the employment services.

- **Promote gender-responsive measures.** Provide childcare, safe transport, and flexible schedules in training and employment schemes to increase participation of Roma and Dom women and youth.

- **Encourage peer learning.** Facilitate exchanges between municipalities, Roma CSOs, and environmental organisations through regional and platforms such as the Zero Waste Foundation and EU–Türkiye Green Partnership dialogues.

Expected benefits

- **Economic:** Improved employability, safer formal jobs, and stronger circular economy performance at municipal level.

- **Social:** Enhanced community participation, reduced discrimination, and better access to sustainable livelihoods.

- **Environmental:** Increased recycling rates, improved waste separation, and progress toward Türkiye's 2053 net-zero and targets of the National Energy and Climate Plan.

4.7.6.2. Pilot Models for Implementation

TÜRKİYE - Pilot measures

Pilot 1	**"Green Skills for All"**: Short-Cycle Training and Employment in Renewable Energy and Retrofitting

Objective:
Equip Roma and Dom youth and low-qualified adults with basic skills for employment in green-construction and energy-efficiency sectors.

Target group:
Roma/ Dom youth (18–30), NEETs, and unemployed adults.

Partners:
 VET institutions, employers, local CSOs.

Core activities:
Develop 100-hour training modules; provide stipends; guarantee employer interviews; and enable recognition of prior learning. The programme should embed structured workplace learning, engaging private-sector partners to offer hands-on training opportunities and real exposure to green-sector jobs.

Indicative budget:
€200,000–€300,000 (100–120 trainees).

Key indicators:
• Certification rate,
• job placement,
• retention after six months.

⚠️✅ **Risks & mitigation:**

Dropout (stipends, flexible schedules); employer reluctance (co-design curricula).

Pilot 2	**"Community Green Spaces"**: Local Employment in Urban Greening and Maintenance

Objective:
Engage Roma and Dom communities in urban greening, landscaping, and community garden maintenance.

Target group:
Local Roma and Dom jobseekers in urban municipalities.

Partners:
Municipalities, Parks Departments, CSOs.

Core activities:
Short horticultural training, temporary contracts for park maintenance and tree planting, and community awareness campaigns.

Indicative budget:
€200,000–€350,000.

Key indicators:
• Number of green jobs created,
• participants retained,
• public-space improvements measured.

⚠️✅ **Risks & mitigation:**

Seasonal employment (rotational contracting); gender barriers (on-site childcare).

4.7.6.3. Monitoring, evaluation, and regional learning

To ensure sustainable outcomes, a joint **monitoring and evaluation (M&E) framework** should be embedded in the National Energy and Climate Plan and Zero Waste reporting systems.

Governance: Designate clear responsibilities for data collection and validation among line ministries and municipalities, with Roma focal points participating in reporting.

Data systems: Integrate social indicators (ethnicity, gender, age) into environmental databases while safeguarding privacy and ethics.

Evaluation frequency: Collect quarterly participation data (training, jobs, contracts) and compile annual progress reports summarising environmental and social results.

Learning and replication: Conduct baseline, midterm, and endline evaluations to measure progress and identify scalable models.

Regional cooperation: Türkiye could engage with Western Balkan peers through the *Energy Community's Just Transition Platform* and *Council of Europe's Roma Integration – Phase III Programme*, contributing lessons learned and benchmarking progress in inclusive green transition.

Taken together, the Beneficiary profiles illustrate both the diversity and the commonalities of Roma inclusion in the green transition across the Western Balkans and Türkiye. While each Beneficiary's context is shaped by specific demographic patterns, institutional arrangements, and policy frameworks, the profiles also reveal recurring barriers, such as limited access to green jobs, gaps in skills provision, and insufficient integration of Roma perspectives into environmental strategies. At the same time, they point to opportunities where existing initiatives, reforms, and partnerships can be leveraged to foster more inclusive approaches.

The systematic presentation of Beneficiaries' evidence provides a solid basis for the comparative analysis that follows. Section 6 builds on these findings to identify cross-cutting trends, highlight transferable good practices, and formulate regional-level recommendations aimed at strengthening Roma participation in the green transition.

5. Policy Recommendations

Building on the comparative findings from the Beneficiary profiles, this section translates regional evidence into actionable policy guidance. It outlines measures that can be adopted at both regional and at the level of specific Beneficiary to advance Roma participation in the green transition. The recommendations address policy coherence, implementation capacity, financing, and safeguards, ensuring that social inclusion principles are embedded in climate and environmental reforms. Recommendations include different levels of action and are directed towards different actors. At the graph below, the architecture of the policy recommendations is presented, while they are elaborated further in next sections.

Regional-level policy actions

| **Governments** (central & local) | **CSOs** (Roma & environmental) | **Donors/IFIs** | **Private sector engagement** |

Just Transition principles and Roma inclusion safeguards
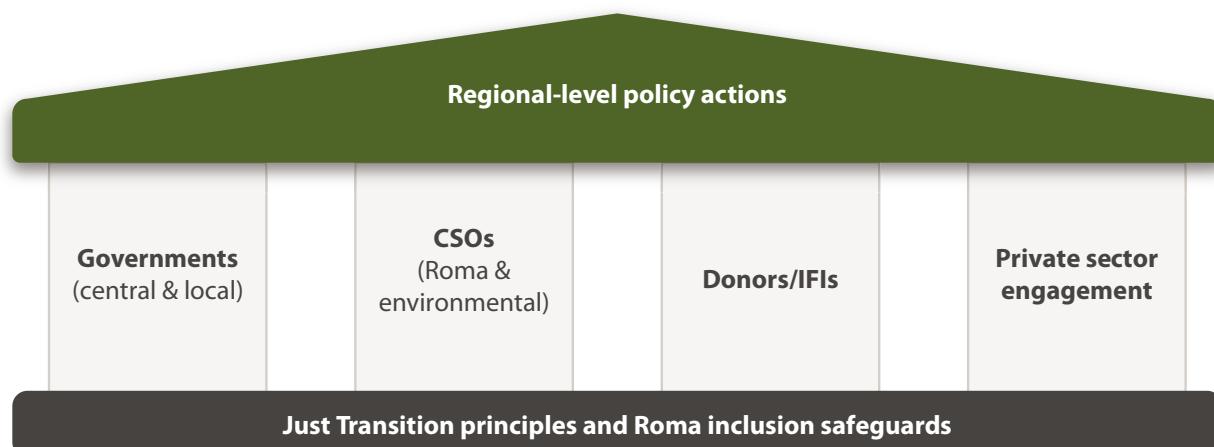
5.1. Regional-level policy actions

The region faces common barriers—informal tenure, data gaps, and pilot projects that don't scale. Regional coordination can set shared standards, unlock pooled finance, and speed municipal delivery. The actions below build a light yet effective framework to align targets, data, and technical assistance across Beneficiaries.

- Establish a **Roma and Green Transition Taskforce** (CoE/EU, Energy Community, RCC, Roma focal points) to align National Energy and Climate Plan /Chapter 27 delivery with Roma inclusion targets.

- Launch a **Regional "Roma-Green" Scorecard** with common KPIs (participation in energy efficiency / renewable energy sources/waste programmes, energy-poverty relief, women/youth uptake), published annually.

- Create a **pooled financing window** for **replicable pilots** (waste/circular economy formalisation; "social-energy" retrofits; short-cycle green skills with job placement).

- Set up a **Municipal Helpdesk** (toolkits + technical assistance) for inclusive SECAPs/LEAPs and contracting models that integrate Roma workers/enterprises.

- Fund a **Peer-Learning Circuit** (city-to-city, CSO-to-CSO, company-to-company) on inclusive waste systems, energy efficiency delivery to informal tenure, and train-to-hire pacts.

Barriers recur across the region (eligibility rules, informal tenure, weak data, pilot-to-system gaps). A light regional architecture raises standards, reduces duplication, and speeds scale-up by pairing shared indicators, targeted technical assistance to municipalities, and a financing lane dedicated to tested models.

5.2. Recommendations to governments, CSOs, and donors

Closing the intent-to-implementation gap requires rule changes, local capacity, and outcome-based financing. Each stakeholder group controls a different "mechanism"—governments set eligibility and procurement, CSOs bridge communities and programmes, and donors de-risk inclusive delivery. The measures below align those levers toward measurable Roma participation and benefits.

Governments (central and local)

- **Hard-wire Roma inclusion into National Energy and Climate Plan /SECAPs:** add Roma-sensitive targets and **"social-energy" access windows** (simplified eligibility, proxy means tests, mediator-led outreach).

- **Adapt eligibility for informal tenure** (attestations/community verification; prepaid/sub-meter solutions) so vulnerable households can access energy efficiency measures.

- **Recognise prior learning** and deploy **micro-credentials (80–120 h)** tied to real vacancies in photovoltaic, energy efficiency crews, Materials Recovery Facility /sorting, agro-processing hygiene.

- Require **disaggregated reporting** (sex/age/Roma where lawful) from contractors on training, placement, and retrofit beneficiaries; publish **quarterly dashboards.**

- Use **inclusive procurement:** award points for bidders with train-to-hire pathways, safe transport/childcare, and retention guarantees for Roma women/youth.

CSOs (Roma and environmental)

- Form **joint outreach teams** (mediator + green NGO) to co-design neighbourhood-level pipelines from awareness -> training -> placement/contracts.

- Operate **community buy-back points/co-ops** under municipal MOUs, ensuring personal protective equipment, occupational safety and health induction, fair pricing and social insurance links.

- Run **local M&E loops** (participant tracking, grievance channels), feeding municipal dashboards and regional scorecards.

Donors/International Financial Institutions (IFIs)

- Make **Roma inclusion a results condition** in energy efficiency /renewable energy sources/waste programmes (e.g., minimum participation/retention thresholds, inclusive procurement).

- Finance **bridge-to-system** costs (mediators, documentation support, recognition of prior learning, quality audits) and **independent verification** of inclusion KPIs.

- Support **multi-year municipal technical assistance** to mainstream inclusive SECAPs and to convert successful pilots into budget-financed programmes.

5.3. Private sector engagement

Employers need reliable entry-level skills, predictable onboarding, and safe, compliant operations. Structured train-to-hire pathways and fair contracting with community recyclers create a win-win: higher retention and quality for firms, and stable, formal livelihoods for Roma workers and entrepreneurs. The actions below translate that into concrete market practices.

- Sign **Train-to-Hire Pacts** with contractors/utilities: short paid practicums, guaranteed interviews, and retention-linked incentives (e.g., 6–12-month retention bonuses).

- Introduce **supplier diversity** in municipal/utility tenders (targets for Roma-owned micro-suppliers in repair/reuse/recycling and facility services).

- Build **apprenticeship lanes** (photovoltaic, energy efficiency, Materials Recovery Facility operations, basic operation and maintenance using **micro-credentials and recognition of prior learning** for workers with informal experience.

- In circular economy chains, formalise **buy-back contracts** with community co-ops; mandate **personal protective equipment/Occupational safety and health** and pay-on-delivery terms.

- Offer **impact-sourced roles** suitable for women/young carers (near-site, predictable shifts; safe transport; on-site childcare during training).

5.4. Just Transition principles and Roma inclusion safeguards

A green transition is only "just" if it expands access, reduces risks, and provides remedies where harms occur. Safeguards make inclusion non-negotiable by screening impacts up front, ensuring meaningful participation, and enforcing redress and accountability. The principles below convert those commitments into enforceable programme rules.

- Apply **Do-No-Harm & Equity Screens** to all green investments (access, affordability, safety, displacement risks, gender/youth impacts).

- Conduct **Energy-Poverty and Tenure Impact Assessments** before energy efficiency /renewable energy sources roll-outs; pair measures with **documentation/legal-aid support** where needed.

- Ensure **meaningful participation** (early, repeated, accessible; mediator-facilitated) and **free, informed choice** for participants.

- Embed **anti-discrimination clauses, personal protective equipment/occupational safety and health standards, safe transport,** and **childcare** in all funded training/works.

- Operate **confidential grievance redress** with clear escalation and response time-limits; report remedy statistics on public dashboards.

- Ring-fence **budget shares** for women and NEET youth; track uptake and retention and adjust design accordingly.

Without safeguards, green reforms can bypass or burden Roma households. Systematic screening, accessible participation, and enforceable remedies ensure benefits flow fairly, while targeted budget shares correct structural underrepresentation.

The following graph presents the responsibility matrix for the policy recommendations and future pilot measures.

Key Action / Stakeholder	Governments	Municipalities	Roma CSOs	Private Sector	Donors / IFIs
1. Integrate Roma inclusion into NECPs and national green strategies	Lead	Support	Support		Support
2. Introduce inclusive access mechanisms for green subsidies (EE, RES)	Lead	Lead	Support	Support	Support
3. Design and roll out social-energy access windows for Roma households	Lead	Lead	Support	Support	Support
4. Develop green-skills pathways (EE, RES, recycling, repair)	Lead	Support	Support	Lead	Support
5. Embed Roma youth into VET and work-based learning schemes	Lead	Support	Support	Lead	Support
6. Formalise Roma waste collectors and integrate them into municipal systems	Support	Lead	Lead	Lead	Support
7. Support Roma green entrepreneurship and self-employment	Support	Support	Lead	Lead	Support
8. Link Roma inclusion with circular economy value chains	Support	Lead	Support	Lead	Support
9. Strengthen municipal capacity for inclusive green delivery	Lead	Lead	Support		Support
10. Improve access to land tenure, documentation and service registration	Lead	Lead	Support		Support
11. Develop Roma-sensitive green monitoring & indicators	Lead	Support	Support		Support
12. Establish community-based waste, greening and repair initiatives	Support	Lead	Lead	Support	Support
13. Mainstream Roma participation in Just Transition and coal-region programmes	Lead	Support	Support	Support	Support
14. Strengthen outreach, mediation and trust-building for green participation	Support	Lead	Lead		Support
15. Pilot inclusive energy-efficiency retrofits in Roma settlements	Lead	Lead	Support	Lead	Support
16. Increase Roma access to green public procurement and local contracts	Lead	Lead	Support	Lead	Support

LEGEND

●	**Lead**	Primary responsibility
○	**Support**	Supporting role
	Empty cell	no direct implementation role

6. Proposed Pilot Measures

Across all seven Beneficiaries, the study reveals a common pattern: Roma communities are already engaged in activities central to the green transition, including recycling and reuse, construction and basic energy efficiency tasks, and seasonal agro-processing. Yet, they remain almost entirely excluded from formal programmes and investments. The pilots proposed below show how these existing capacities and labour market mismatches can be transformed into structured, scalable and inclusive green opportunities.

6.1. Overview of pilot types by theme

Pilot measures fall into four thematic clusters that correspond to the main levers of inclusion identified through the study:

1. Skills development and employment pathways

Short, modular, and employer-linked training programmes (80–120 hours) coupled with recognition-of-prior-learning paid practicums, and retention-based incentives. These address skills mismatches and create immediate labour market entry points in energy-efficiency retrofits, solar photovoltaic installation, waste-management operations, and agro-processing.

2. Inclusive entrepreneurship and SME support

Micro-grant and mentoring schemes for Roma micro-entrepreneurs in repair, reuse, and recycling services, integrated into municipal or circular economy value chains. They convert informal livelihood practices into formal, greener enterprises.

3. Social and community-based models

Municipal or CSO-led initiatives that formalise Roma participation in waste sorting, collection, or urban greening through contracts, cooperatives, or public-works programmes. They combine environmental improvement with social cohesion.

4. Just Transition access windows

Tailored mechanisms allowing vulnerable Roma households to benefit from energy-efficiency retrofits and renewable-energy programmes despite informal tenure or documentation barriers, including community verification, simplified eligibility, and mediation.

Together, these clusters provide a coherent toolbox adaptable to different institutional contexts while sharing core features: participatory design, gender and youth sensitivity, and built-in monitoring for Roma-specific outcomes.

To support quick reference and cross-Beneficiary comparison, the table below summarises the proposed pilot themes, core focus areas, key partners and indicative scope for each Beneficiary.

6.2. Summary of pilots per Beneficiary (illustrative overview)

While the thematic clusters present the overall logic of the pilot portfolio, the table below shows how these concepts are operationalised in each Beneficiary. It highlights priority areas of intervention, expected scale and the key institutions positioned to lead delivery.

Table 2. Summary of pilot measures per Beneficiary

Beneficiary	Priority Pilot Theme	Core Focus	Lead/Partners	Indicative Scope
Albania	Circular economy / Municipal waste inclusion	Formalisation of Roma collectors and green micro-entrepreneurs through contracts and training	Municipalities, Roma CSOs, waste operators	100–150 workers formalised per city
Bosnia and Herzegovina	Green public-works schemes	Paid community engagement in urban greening and energy efficiency retrofits with short training modules	Local employment services, UNDP, municipalities	200 temporary jobs -> long-term placements
Kosovo*	Solar photovoltaic and energy efficiency skills tracks	80–120 h modular training + recognition of prior learning for Roma youth and women with contractor partnerships	VET centres, Energy Agency, private firms	100 trainees per cohort
Montenegro	Social-energy access window pilot	Energy-poverty relief for informal Roma settlements via simplified retrofit schemes	Min. of Energy, municipalities, CSOs	250 households retrofitted
North Macedonia	Green enterprise incubation	Micro-grants and mentoring for Roma SMEs in repair/reuse and recycling services	SME Agency, Roma business associations	40–60 enterprises supported
Serbia	Inclusive waste value chain	Buy-back centres and cooperative contracts linking Roma collectors to municipal systems	Public utility companies, Roma CSOs	3–5 cities piloted
Türkiye	Green skills and female employment pathways	Short modular training for women and youth in construction and renewables	MoLSS, VET institutions, employers	150 participants per cycle

Note: The table is indicative and meant to guide regional alignment and peer learning rather than serve as a funding pipeline

The portfolio illustrates both diversity and coherence across Beneficiaries. While the thematic focus varies from circular economy and skills development to social-energy access windows, the pilots share common design features: short, modular pathways into green jobs; formalisation of existing informal roles; and mechanisms to overcome documentation and tenure barriers. Several models, such as green public-works schemes or inclusive waste value chains, show clear potential for replication across economies with similar institutional structures.

6.3. Regional-level reflection: common challenges, enabling conditions, replication and scaling up potential

Common challenges. Across Beneficiaries, pilot schemes face recurring constraints: fragmented governance between social and environmental authorities; short-term donor funding without institutional follow-up; eligibility rules that exclude informal households; and weak monitoring systems without Roma-specific indicators. These factors limit continuity and scalability.

Enabling conditions. Three elements consistently determine success:

1. **Municipal ownership –** pilots embedded in local action plans and budgets survive beyond donor cycles.

2. **Institutional bridges –** joint coordination between social (inclusion) and environmental/energy line ministries creates policy linkage.

3. **Inclusive delivery mechanisms –** Roma mediators and CSOs acting as implementation partners increase trust and uptake.

Replication and scaling up. Regional organisations (Energy Community, Council of Europe Roma Integration – Phase III Programme, RCC) can jointly maintain a "Roma and Green Transition Pilot Hub" to document, peer-review, and replicate models through common toolkits, standard KPIs, and a shared scorecard. Scaling should follow a stepwise logic: (1) validation in two municipalities per Beneficiary; (2) integration into sectoral programmes (energy efficiency, waste management, employment schemes); (3) budget mainstreaming with domestic co-financing and EU/IFIs support.

Ultimately, the proposed pilots form a coherent bridge between Roma inclusion policies and green transition reforms — demonstrating how social justice and environmental sustainability can advance together in the Western Balkans and Türkiye.

7. Conclusion

7.1. Final remarks

The Roma inclusion and green transition agendas share a common rationale: both aim to build resilient, fair, and sustainable societies.

Graph 5: Regional Roma and Green Transition Pilot Hub
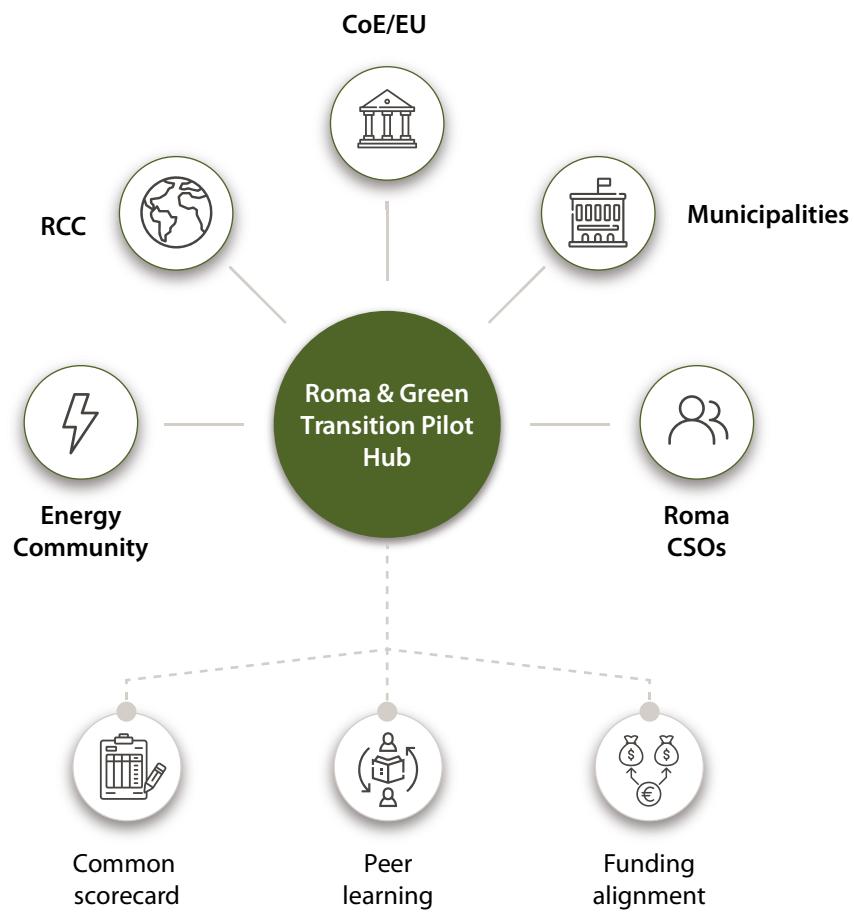
This study has shown that the two remain largely parallel in practice but deeply interconnected in impact. While environmental reforms are accelerating across the Western Balkans and Türkiye, Roma communities continue to face structural barriers that limit access to education, skills, and formal employment—precisely the domains that the green transition depends on. The evidence gathered confirms that inclusion is not a peripheral concern but a precondition for effective, equitable climate and energy policies.

At the same time, numerous entry points already exist. Informal recycling, construction, and small-enterprise activities reveal tangible links between Roma livelihoods and green-sector growth. When policy frameworks recognise these linkages, local projects quickly demonstrate positive economic, environmental, and social outcomes. The regional synthesis therefore underscores that the question is no longer whether Roma inclusion fits within the green transition, but how quickly institutions can make that fit operational.

7.2. Lessons learned

Three overarching lessons emerge from the comparative analysis:

1. **Integration beats parallelism.** Fragmented governance, between social and environmental institutions, between central and municipal levels, remains the greatest bottleneck. The most successful examples are those where inclusion targets and climate objectives share budgets, indicators, and delivery mechanisms.
2. **Local anchoring ensures continuity.** Pilots survive and expand when municipalities assume ownership, dedicate staff and budget lines, and work with Roma mediators and CSOs as implementation partners. Donor-funded projects that fail to institutionalise local roles tend to dissolve once funding ends.
3. **Evidence and participation drive credibility.** Systematic data collection on Roma participation in green programmes, coupled with participatory monitoring, improves both accountability and trust. Where communities see measurable benefits (jobs, safer work, lower bills) uptake rises rapidly.

These lessons suggest that inclusion is not a side effect of good policy design but a deliberate outcome of coherent governance, steady investment, and participatory practice.

7.3. Future research and policy directions

The study highlights several areas where further inquiry and policy development would deepen impact:

- **Quantifying Roma participation in green sectors.** Beneficiaries' statistical offices and energy agencies should develop Roma-disaggregated indicators within Energy and Climate Plan and Green Agenda monitoring frameworks to assess who benefits from green investments.

- **Evaluating inclusive finance mechanisms.** Future research could test models such as revolving micro-funds, cooperative contracting, and social-impact bonds tailored to inclusive circular economy enterprises.

- **Exploring gender and youth dynamics.** Dedicated studies are needed on barriers facing Roma women and NEET youth in emerging green occupations, informing design of safe, flexible, and affordable training routes.

- **Measuring social co-benefits of climate action.** Integrating social-equity metrics into environmental cost–benefit analyses would help ministries and donors recognise the developmental value of inclusion.

- **Scaling through regional cooperation.** A regional "Roma and Green Transition Hub" could serve as a knowledge platform for peer learning, data exchange, and monitoring of shared indicators under the Council of Europe and Energy Community frameworks.

*In conclusion, the green transition in the Western Balkans and Türkiye represents not only a technological transformation but also a social one. Embedding Roma inclusion within this shift is both a moral and practical imperative: it enhances equity, builds local ownership, and strengthens the sustainability of climate action. It is also a **smart investment: unlocking underutilised labour and entrepreneurial potential, improving the effectiveness of public spending, and accelerating local delivery in areas such as waste management, energy efficiency, and circular services**. The findings and pilot models presented in this study provide a roadmap for governments, donors, civil society, and the private sector to ensure that the path to a greener future is also a more inclusive one.*