



## **REPORT**

### **Use of Plastic Bags in Kosovo**

**2024**

**Prishtina 2025**

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Abbreviations	Full meaning in English
<b>KEPA</b>	Kosovo Environmental Protection Agency
<b>TAK</b>	Tax Administration of Kosovo
<b>WB</b>	World Bank
<b>EU</b>	European Union
<b>GIZ</b>	Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ)
<b>K4G</b>	Kosovo4Green Program
<b>RCC</b>	Regional Cooperation Council ( <i>if mentioned in the annexes</i> )
<b>MESPI</b>	Ministry of Environment, Spatial Planning and Infrastructure
<b>SMEs</b>	Small and Medium Enterprises
<b>GDP</b>	Gross Domestic Product
<b>UNDP</b>	United Nations Development Programme
<b>AI</b>	Administrative Instruction
<b>N</b>	Number of respondents

## **1. Introduction**

The purpose of the assessment is to analyze the progress made since the entry into force of AI No. 07/2023 (as amended and supplemented by AI No. 04/2025), focusing on the compatibility between different categories of retailers, institutional coordination, consumer behavior and the contribution of policy to reducing plastic waste generation.

This report has been prepared in accordance with the Terms of Reference (ToR) and reflects discussions held during 2024 between GIZ, MESPI and the consultancy. The report has also been drafted on the basis of an initial review of relevant legal, policy and monitoring documents, as well as preliminary consultations with key institutional and other stakeholders. The report presents the purpose and objectives of the assessment, the methodological approach, the main activities and the expected results for the use of plastic bags. The report provides a structured plan for data collection and analysis, combining quantitative evidence (institutional records, surveys and retailer data) with qualitative insights from field visits, interviews and focus group discussions. This approach ensures that the assessment will provide a comprehensive and evidence-based analysis to inform future policy decision-making, strengthen implementation mechanisms, and support Kosovo's progress towards a circular economy and environmental standards aligned with the EU.

### **1.1. Purpose and Objectives of the study**

The overall purpose of this assessment is to analyze the implementation, compliance and early impacts of Administrative Instruction (AI) No. 07/2023 (as amended and supplemented by AI No. 04/2025) on the reduction of the use of plastic bags (25-50 microns) in Kosovo.

The assessment aims to:

- Assess the degree of implementation of AI No. 07/2023 across the retail sector, focusing on compliance with the provisions on the mandatory €0.05 fee, labeling and technical standards.
- Assess progress towards the short-term policy objective of reducing plastic bag consumption to 180 bags per person per year by the end of 2024.
- Examine institutional coordination and enforcement mechanisms, including data exchange between the MESPI, KEPA, Tax Administration of Kosovo (TAK), Customs and the Market Inspectorate.
- Analyze consumer awareness and behavior change based on survey data, field observations, and focus group discussions.
- Identify key challenges and capacity gaps that impact policy effectiveness, particularly among small retailers and local producers.
- Develop practical and evidence-based recommendations for the MESPI, KEPA and to strengthen policy implementation, ensure fair implementation and support the transition phase towards sustainable alternatives.

## 1.2. Report structure

This report is organized into several sections that together present the approach, findings, and recommendations of the assessment.

**Section 2** describes the methodological approach of the study, detailing the implementation of a mixed methods design that integrates legal desk review, institutional data collection, focus group discussions, consumer surveys, field monitoring visits, compliance and trend analysis, and a brief impact assessment.

**Section 3** provides a review of relevant policy and legal documents, summarizing the regulatory and institutional framework governing the reduction of lightweight plastic carrier bags in Kosovo.

**Section 4** presents the results of field research and focus group discussions with key stakeholders and summarises the findings of the consumer survey using the retailer-based assessment approach. Finally, **Section 5** presents the main conclusions and policy recommendations, outlining practical actions to strengthen implementation, increase public understanding and ensure the long-term effectiveness of the plastic bag reduction policy.

## 2. Methodology

This section describes the comprehensive methodology that guided the assessment of the €0.05 plastic bag fee policy. The methodology is structured around six interrelated components, each designed to address a specific aspect of the task. These components include legal and policy review, institutional data collection, field engagement with stakeholders, analytical work, impact assessment and formulation of recommendations. To operationalize these components, the study relies on four complementary lines of research:

- i. **Research and review of documents, reports and secondary analysis**– systematic review of legislation, policy documents and existing databases.
- ii. **Qualitative field research**– Semi-structured interviews with focus groups and stakeholders to capture perceptions, challenges and best practices.
- iii. **Data from retailers on the number of plastic bags**– data provided by retailers in Kosovo.
- iv. **Consumer survey**– an online survey directed at citizens to analyze behavior towards single-use plastic bags and derive average consumption rates.

Combined, these lines of research provide a strong evidence base for assessing policy effectiveness and for drafting feasible recommendations. The following section provides a review of relevant documents and reports related to the implementation of AI No. 04/2025.

## 3. Review of relevant political and legal documents

Kosovo's policy and legal framework on the production, distribution and use of lightweight plastic carrier bags has been developed in line with European Union standards, relying on three main documents:

- Analysis on Plastic Carrier Bags (MESPI, 2022),
- Administrative Instruction (GRK) No. 07/2023 on Packaging and Packaging Wastes (Government of Kosovo, 2023), and
- Directive (EU) 2015/720 of the European Parliament and of the Council (2015).

These documents together form the basis of the national policy for reducing plastic bags and aligning Kosovo's environmental objectives with those of the EU.

In 2022, the Ministry of Environment, Spatial Planning and Infrastructure (MESPI), with the support of the German Government and the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ), conducted a comprehensive analysis of the production, use and disposal of lightweight and ultra-light plastic carrier bags in Kosovo (MESPI, 2022). The analysis showed that the annual per capita consumption reached 335 plastic bags, one of the highest levels in the region and in EU countries. The study identified gaps in legislation and environmental and socio-economic impacts, as well as proposed new policy options for effective solutions. The most favorable option was the introduction of a mandatory minimum price for lightweight plastic carrier bags, accompanied by public awareness campaigns and incentives for the use of reusable alternatives (MESPI, 2022). The document envisaged implementation in two stages: first, setting a minimum price of €0.05 per bag, which also included an environmental tax of €0.02 dedicated to a special fund; and then, a complete ban on lightweight plastic bags if the reduction targets were not achieved by 2025–2026. This document underlined that reducing the consumption of plastic bags is essential for protecting the environment and the transition towards sustainable production and consumption models.

In August 2023, the Government of the Republic of Kosovo adopted Administrative Instruction No. 07/2023 on Packaging and Packaging Wastes, making this policy a legal obligation (Government of Kosovo, 2023). This instruction set clear national targets for reducing the use of plastic bags: by 31 December 2024, consumption should not exceed 180 bags per person per year, while by 2030 it should be reduced to 40 bags per person. To implement these targets, mandatory annual reporting by manufacturers, Kosovo Customs and the Tax Administration to the Kosovo Environmental Protection Agency (KEPA) is foreseen on the quantity of bags produced, imported and sold. These data will enable the comparison of results with the baseline year 2022 and the measurement of progress towards the set targets. Administrative Instruction No. 07/2023 marks an important step in the transition from voluntary policies to mandatory regulation, including pricing mechanisms, technical standards, and monitoring and reporting systems. The European Commission, in its Progress Report for Kosovo (European Commission, 2024), has described this as a notable achievement in the approximation of the country's environmental policies with those of the EU.

At the European level, Directive (EU) 2015/720 of the European Parliament and of the Council of 29 April 2015 amending Directive 94/62/EC as regards reducing the consumption of lightweight plastic carrier bags is considered a fundamental EU legal instrument to mitigate plastic pollution (European Parliament & Council of the European Union, 2015). It amends Directive 94/62/EC on packaging and packaging waste, by establishing concrete measures to reduce the consumption of plastic bags with a thickness of less than 50 microns, which are more harmful to the environment due to their limited use and high potential for disposal. The Directive requires Member States to adopt measurable policies such as minimum prices and bans on free distribution or national reduction targets, with the aim of reducing the use of 90 bags per person by 2019 and 40 bags by 2025 (European Commission, 2020; European Environment Agency – EEA, 2021). It highlights the importance of awareness campaigns and standardised reporting to ensure transparency, and provides flexibility for the introduction of economic instruments that reflect the environmental cost of plastics, allowing exemptions for very lightweight bags below 15 microns used for hygiene reasons (CMS Law, 2024). Examples from Ireland and Portugal, which achieved reductions of over 90% after the introduction of plastic taxes, demonstrate the effectiveness of this approach (Convery et al., 2007; EEA, 2021).

Administrative Instruction No. 04/2025 of Kosovo is fully in line with the principles of the Directive, integrating binding targets, economic measures and monitoring mechanisms. This demonstrates the country's ongoing efforts to align its environmental legislation with the EU *acquis communautaire* and to meet the commitments of the Green Agenda for the Western Balkans (European Commission, 2023). The implementation of Directive 2015/720 has brought measurable results across the EU: according to Eurostat (2024), each EU resident used an average of 66.6 plastic bags in 2022, marking a decrease of 14% compared to 2021. This decrease reflects the widespread use of price-based measures and awareness-raising campaigns that have changed consumer behaviour and significantly reduced plastic pollution. However, differences remain between countries, as some countries such as Belgium and Portugal are close to reaching the 2025 target, while other countries such as Lithuania and Latvia continue to have high consumption due to the use of very light bags.

Overall, this policy and legal framework represents an important step for Kosovo towards alignment with European standards, institutionalizing evidence-based policies, behavioral change and long-term sustainability. The 2022 Policy Document established the analytical basis and recommended economic measures for changing consumer behavior, while Administrative Instruction 07/2023 turned this vision into an enforceable legal instrument. The alignment of these documents with Directive (EU) 2015/720 constitutes evidence of Kosovo's commitment to environmental protection and the transition to a circular economy. This integrated approach puts Kosovo on the right path towards reducing plastic pollution, improving waste management and sustainable development in line with European best practices.

## **4. Findings**

### **4.1. Findings from focus groups**

Discussions held with focus groups — institutional representatives, manufacturers, retailers and market inspectors — provided a broad overview of the challenges, progress and next steps in the implementation of Administrative Instruction No. 07/2023 and the newly approved Administrative Instruction No. 04/2025 on lightweight plastic carrier bags.

The results show that, although the legal framework is in place and has brought about significant improvements in reducing the use of plastic bags, significant challenges remain in the areas of data reporting, inter-institutional coordination, market surveillance, and economic support for local producers.

Another prominent problem was the lack of capacity of the responsible institutions. Each institution or agency operates with its own reporting system. Representatives emphasized that this fragmentation hinders sustainable monitoring and realistic assessment of policy progress.

In the domestic market, a clear gap was found between large and small retailers. Large supermarket chains apply the €0.05 price rule and report sales accurately, while small markets and shops often offer free and illegal bags, without billing or reporting, creating unfair competition and loss of tax revenue.

At the same time, informality continues to be an obstacle to collecting accurate data. The circulation of unregistered plastic bags, especially in local markets, constitutes a significant part of invisible economic activity.

Another important finding relates to the economic impact of the minimum price of €0.05. Although this measure has significantly reduced the consumption of plastic bags, it has caused a sharp decline in local production. Producers warned that, without financial and technical support, some factories risk closing. For this reason, it was proposed that part of the revenue generated by the fee be redistributed through grants, soft loans and innovation vouchers, to help the transition towards biodegradable and reusable products.

On the other hand, market inspectors reported that implementation on the ground is still partial and largely formal. Labeling and the presence of the logo are mainly checked, while equipment for measuring the thickness of the bags (25–50 microns) is missing. Furthermore, no fines have been imposed for violations of the regulation to date, initially due to the transitional phase of implementation, but even after this phase was completed.

The group of inspectors emphasized the need to increase technical capacity and create a common digital dashboard for recording inspections, analyzing trends, and sharing data between agencies.

In conclusion, the focus groups agreed that Kosovo has made significant progress in market formalization and reducing the use of plastic bags, but to achieve the objectives by 2030, closer inter-institutional cooperation, improved reporting systems, support for local producers, and more effective communication with the public are required. Table 1 summarizes all findings and recommendations emerging from these combined discussions.

*Table 1 Summary of findings from focus groups*

Category	Main Findings	Illustrative Quotes	RECOMMENDATIONS
<b>Data accuracy and measurement issues</b>	Both TAK and Kosovo Customs reported limited capacity to accurately track the production, import and sale of lightweight plastic bags. Currently, TAK has no mechanisms to request or record data on the quantity of plastic bags sold or distributed, while Customs cannot distinguish between different categories of plastic products under existing tariff codes.	“Plastic bags are only recorded by kilogram, not by individual pieces, and are not categorized as single-use plastic bags by Customs during import. We at TAK cannot ask companies to report specific products — they only report total sales. We cannot know how many bags are actually in circulation.”	Introduce reporting by unit (piece) and create specific customs codes for lightweight plastic bags (25–50 microns). Create a unified inter-institutional data system (TAK, Customs and Market Inspectorate) for accurate and consistent monitoring.
<b>Coordination between stakeholders</b>	There is limited coordination and information exchange between key institutions responsible for implementing and monitoring the Administrative Instruction — including TAK, Customs, KEPA, and the Market Inspectorate.	“We are all working on the same issue, but we need specific forms for filling in the data. There has also been no adequate cooperation in implementing responsibilities.”	Create a central digital platform for reporting and clearly define roles and procedures for data sharing between institutions.
<b>Big sellers versus small ones</b>	Large supermarket chains abide by the €0.05 rule, contributing about 60% of national usage, while small markets and bakeries often do not issue invoices or report plastic bag sales.	“Big markets abide by the rule, but small shops give away bags for free and don’t report them — that’s where the main problem lies.”	Strengthen the inspection of small vendors, implement awareness campaigns, and ensure fair enforcement of the law for all market actors.
<b>Informality and gaps in implementation</b>	Informality persists mainly in small shops and bakeries that distribute unregistered bags,	“Many small shops don’t issue receipts and don’t report plastic bags — they’re invisible to the system.”	Intensify field inspections and promote joint implementation between TAK, Customs and the Inspectorate.

	undermining revenue collection and accurate analysis.		
<b>Economic impact of the €0.05 fee</b>	The introduction of the minimum fee of €0.05 under AI 07/2023 has led to a significant reduction in the consumption of plastic bags, but has also caused a sharp decline in local production.	"Production fell among plastic bag manufacturers. This policy is hurting local factories and companies are trying to find innovative products to offset this effect."	Conduct a comprehensive economic impact assessment and create transition programs for affected producers through grants, loans, and technical support.
<b>Compliance and implementation</b>	Large chains enforce the rules, but small shops often do not apply the €0.05 fee; no fines have been imposed.	"We follow the law and charge all bags, but others don't — that's unfair."	Apply sanctions for non-reporting and focus inspections on small traders.
<b>Coordination with institutions</b>	Businesses report poor coordination with TAK, Customs and KEPA. Customs codes group all plastic products together.	"Customs puts everything under one code — we can't track imports."	Clearly define reporting protocols and organize regular meetings with industry.
<b>Informal and illegal operators</b>	Unregistered sellers distribute bags below standard thickness and without logos or taxes.	"Some people sell bags from garages — they don't pay taxes and they don't follow any rules."	Develop joint TAK-Customs-Inspectorate operations to identify illegal producers and implement a traceability system that links bags to licensed producers.
<b>Financial and technical support</b>	Manufacturers warn of the risk of closure without government assistance. There are currently no public programs supporting the modernization of the industry.	"We need government support to develop other products."	Provide grants and credit lines to help companies diversify into biodegradable and reusable products.
<b>Consumer awareness and behavior</b>	Consumers buy fewer bags because of the price, but there is often a lack of awareness of the environmental purpose of the policy.	"The €0.05 fee makes customers think twice — but many don't know why it matters."	Develop public awareness campaigns and educational materials at points of sale.

## 4.2. Field monitoring visits

For the purposes of direct field observation, representatives from GIZ and KEPA conducted monitoring visits to several municipalities to assess the implementation and enforceability of Administrative Instruction (AI) No. 07/2023 on lightweight plastic carrier bags.

TABLE 2 Summary of findings from field monitoring visits on the implementation of AI No. 07/2023 in the retail sectors

Sales sector / location	Visited examples	Is the €0.05 fee applied?	Visible logo/label	Available alternatives	Key observations	Overall assessment
<b>Large and medium-sized markets</b>	5 brand chains	Yes (stable)	Yes, in the cashier's bags	Limited; mostly plastic	Cashiers regularly asked customers how many bags they wanted; the fee was displayed at the register. In two chains, very thin (<25 microns) bags with handles were used in the fruit and vegetable sections – both non-compliant.	High consistency overall, but partial discrepancies in the fruit/vegetable sections.
<b>Small markets / local shops</b>	Local shops in Prishtina, Fushe Kosove, Drenas, Kacanik	No (free bags)	No	No	Sellers are often uninformed about the regulation; bags are distributed for free without price or labeling.	Compatibility not applied
<b>Bakeries and small food outlets</b>	Bakery and 2 food stalls	No (free bags)	No	None observed	Bags are provided automatically; customers are not informed of the policy requirements.	Compatibility not applied
<b>Manufacturer / wholesaler</b>	Plastic bag manufacturing company (Prishtina)	Registered; aware of standards	Yes, in the supplied products	Yes (biodegradable options)	They reported a significant drop in demand since the introduction of the fee; reduction in production and exploration of new product lines.	Compliant, but economically affected

In the formal retail sector (large and medium-sized supermarkets), the €0.05 fee is regularly applied and clearly recorded at the cash register, indicating that the policy is being implemented as intended, especially where procedures are standardized and supervision is stronger. In contrast, small markets and bakeries often do not apply the fee and lack logos or barcodes, leading to uneven implementation and weakening the environmental signal of the policy. Technical violations were also observed in the fruit and vegetable sections of two large supermarkets, where bags with handles and below 25 microns are used — prohibited under AI No. 07/2023.

On the supply side, producers reported a decline in sales after the tariff was imposed, signaling a positive shift towards reduced consumption, but also the need to support local industry during the transition. The monitoring results show that Kosovo's plastic bag reduction policy is successfully influencing consumer behavior and sales practices among large and formal actors, but remains less effective among small and informal traders.

### 4.3. Consumer survey

To complement the institutional and field assessment on the €0.05 fee for plastic bags, a survey was conducted with 341 consumers from different municipalities.

Purpose: to measure knowledge, attitudes and behavioral change following the introduction of the fee. The survey was distributed online (self-selected sample), so the findings more strongly reflect a digitally active public, but still provide valuable insights into the acceptability and impact of the policy. The gender distribution is relatively balanced, (56% women, 44% men). Almost half (45%)

are the main food buyers in the household and 29% share the role, making them sensitive to the measures at the point of sale.

### 4.3.1. Frequency of shopping in small shops (that do not apply the bag fee)

Understanding the pattern and frequency of citizens’ daily purchases provides valuable insights into consumer behavior, potential sources of non-implementation of the plastic bag fee policy, and the extent of informal activity in retail trade in Kosovo. Asking about the frequency of purchases at neighborhood shops (such as kiosks, bakeries, and minimarkets) helps identify cases where consumers are engaging with outlets that are more likely to distribute free bags and operate outside of formal monitoring mechanisms.

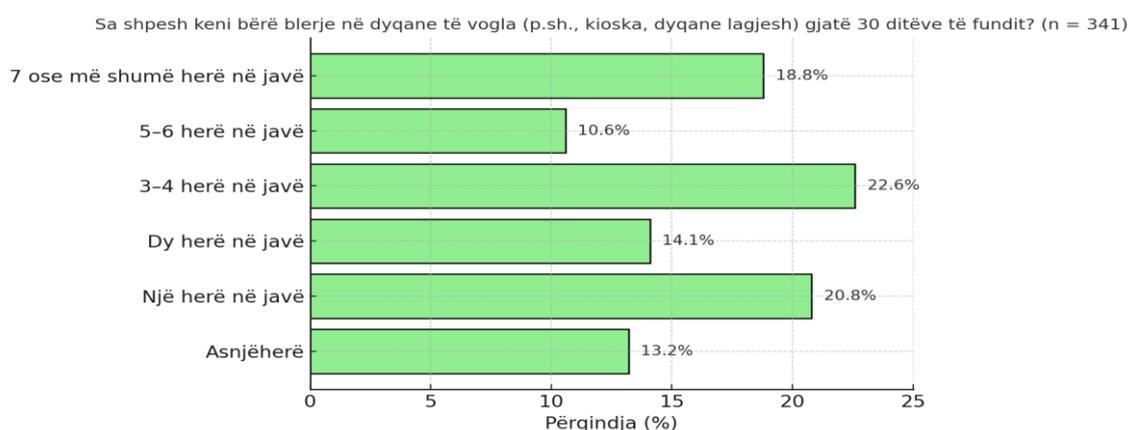


Figure 1 How often have you shopped in small shops (such as kiosks, neighborhood stores) during the last 30 days?

The findings show that small and informal traders remain the mainstays of everyday consumption (Figure 1). Around 43% of respondents shop in small shops several times a week and 19% every day, indicating a high dependence on these points of sale. This poses a challenge for the implementation of AI No. 07/2023, as many micro-businesses operate outside the formal system and distribute plastic bags for free, weakening the effect of the tariff and reflecting the size of the informal economy. Therefore, strengthening surveillance, awareness-raising campaigns and the promotion of biodegradable alternatives are essential for equitable implementation and measurable environmental results.

### 4.3.2. Public attitudes towards the plastic bag fee policy

To assess citizens' perceptions and reactions to the new measure introduced by Administrative Instruction No. 07/2023, respondents were asked several questions regarding attitudes, acceptance, and behavioral changes following the introduction of the €0.05 fee for plastic bags.

Table 3 Citizens' assessment of the plastic bag fee policy

Statement	Yes	Neutral	No
I support the plastic bag fee policy	65.5%	11.6%	22.9%

<b>When the need arises, I willingly pay for a plastic bag</b>	9.7%	13.9%	76.4%
<b>The payment policy has influenced me to use fewer plastic bags</b>	63.0%	15.1%	22.0%
<b>I bring my bag more often since the introduction of payment</b>	24.9%	29.1%	46.0%
<b>I bring my own bag mainly for environmental reasons, not just to avoid paying</b>	43.5%	12.9%	43.5%
<b>I bring my bag to support environmental protection (general environmental motivation)</b>	56.7%	15.2%	28.2%

The survey results show that the plastic bag fee policy enjoys broad public support and has had a significant impact on consumer behavior. Thus, 65.5% support the policy, but only 9.7% buy the bags willingly, indicating price sensitivity. Some 63% say they use fewer bags, while 46% bring their own reusable bags more often. Furthermore, 56.7% do so for environmental reasons, reflecting increased awareness. In essence, the fee has functioned as an economic incentive that is gradually being coupled with environmental motivation, reinforcing sustainable behaviors. However, monitoring of retailers and public awareness campaigns remain essential to maintain and expand this positive impact.

#### 4.3.3. Policy acceptability: Perception of fairness of the €0.05 fee for plastic bags

Understanding how citizens perceive the fairness and acceptability of the €0.05 tariff is essential for assessing the social legitimacy and long-term sustainability of the policy. Public acceptance determines whether the measure is seen as a reasonable environmental instrument or as an additional economic burden on consumers.

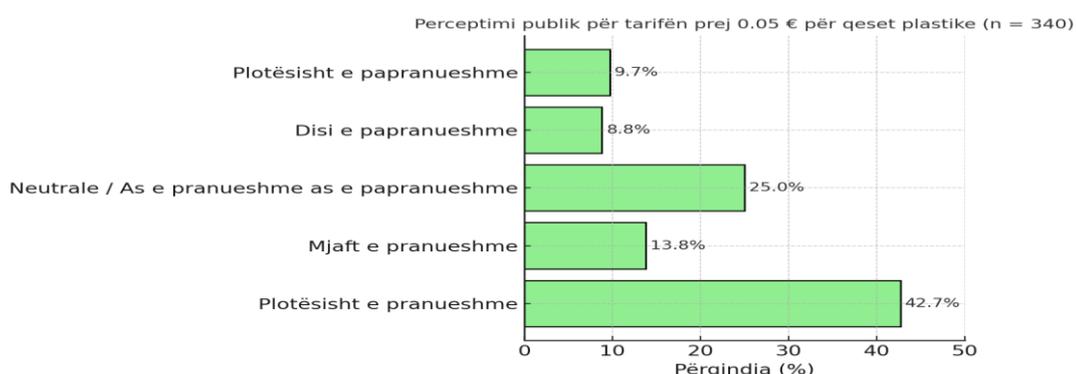


Figure 2 Perception of acceptability of the €0.05 fee for plastic bags

The plastic bag fee is widely accepted, with 56.5% of citizens considering it fair and acceptable (figure 2). Only <20% oppose it, while 25% remain neutral. This shows a strong social legitimacy, linked to environmental awareness and experiences from similar policies in the region. Citizens perceive the fee as fair and proportionate, creating a basis for sustainable compliance and new environmental measures. In fact, 57.1% of respondents now support a complete ban on plastic bags, indicating a willingness to take stronger steps towards environmental protection.

#### 4.3.4. Public perception of the price of plastic bags

The perception of the price plays a key role in the effectiveness of the €0.05 fee, determining whether it actually discourages the use of plastic bags or is seen as a symbolic measure. For this reason, the survey included questions on the appropriateness of the current fee and the possible

future price. Some 33% of respondents consider the current price to be fair, while 40.1% think it is insufficient and 27.3% remain unsure (figure 3). This indicates an expectation for stronger measures and a need for more communication on the environmental purpose of the policy.

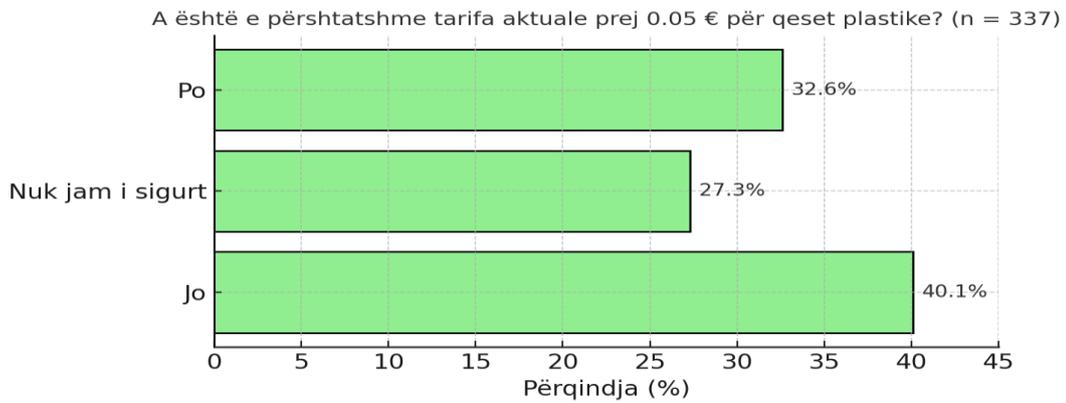


Image 3 Is the current €0.05 fee for plastic bags appropriate? (n = 337)

Among those who consider the fee low, 37% suggest €0.10, 35% above €0.25, and 19% prefer €0.20 (Figure 4). This indicates a broad willingness to increase the price, seeing it as an effective tool to reduce plastic use. Overall, the results suggest that the public is open to a progressive increase in the fee, perceiving it as fair and in line with EU best practices for reducing single-use plastics.

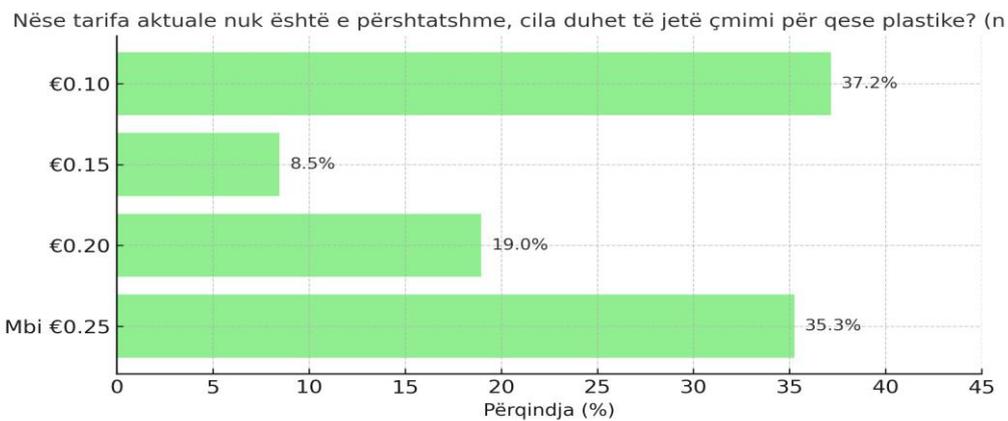


Image 4. Preferred future price for plastic bags among respondents who consider €0.05 as inappropriate

#### 4.3.5. Effectiveness of the Plastic Bag Fee Policy

To assess the effectiveness of the €0.05 plastic bag fee policy, respondents were asked to indicate whether this measure had influenced their shopping behavior. The results, shown in Figure 5, show a strong behavioral response to the policy.

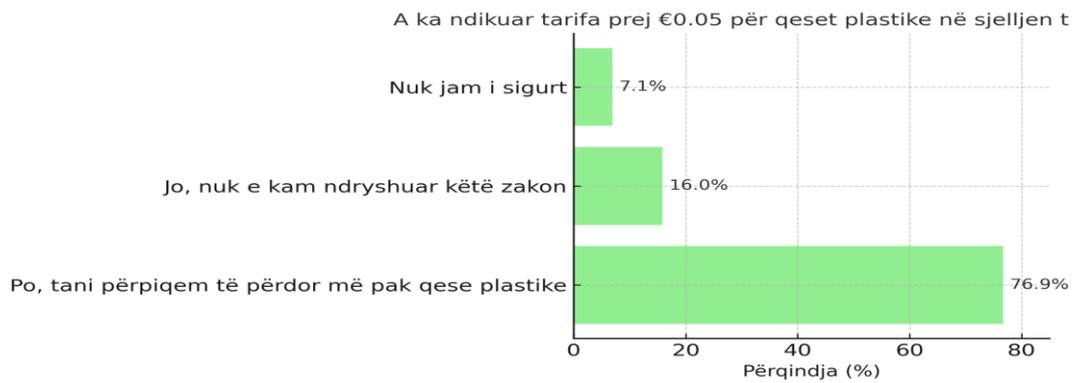


Image 5. Self-reported impact of the €0.05 plastic bag fee policy

The results presented in Figure 8 assess the effectiveness of the €0.05 fee in changing consumer behavior. The findings are very encouraging: 76.9% of respondents reported that they now actively try to use fewer plastic bags, demonstrating a clear behavioral response to the policy. Only 16% stated that they had not changed their shopping habits, while a small group (7%) remained unsure whether the policy had influenced them.

These results provide strong evidence that the pricing mechanism has been effective in promoting more sustainable practices among consumers. The fact that more than three-quarters of respondents admit to a reduction in plastic bag use shows that the measure has managed to induce a significant change in behavior within a relatively short period of implementation.

From a policy perspective, these findings confirm that economic incentives can successfully drive environmental change when implemented sustainably and accompanied by strong public communication. The broad behavioral response also supports the argument for maintaining or even increasing the tariff in future phases to consolidate the progress achieved.

Furthermore, the small but consistent proportion of respondents who have not changed their habits highlights the need for ongoing public awareness campaigns and targeted monitoring of retailers who may still offer free bags. Addressing these gaps will be essential to ensure that the full environmental potential of the policy is realised and maintained over time.

#### 4.3.6. Respondents' opinions and suggestions on the implementation of the plastic bag fee

In addition to the quantitative survey results, a set of open-ended questions was also analyzed to capture the qualitative and subjective perspectives of respondents on the implementation of the plastic bag fee. These narrative responses provide valuable insights into public attitudes, perceived challenges, and suggestions for improving the policy, providing a deeper understanding of citizen experiences beyond statistical indicators (Table 4). Of the 241 responses collected, the majority of participants provided positive opinions and concrete suggestions for improving the implementation of the plastic bag fee and reducing its use. Around 40% of the responses were neutral or selected “No” (no specific suggestion), while around 60% contained valuable recommendations, which can be grouped into several thematic categories.

Table 4. Respondents' opinions and suggestions on the implementation of the plastic bag fee

Opinion/Suggestion Category	Description	Approximate percentage of responses
<b>Complete removal or ban of plastic bags</b>	Participants emphasized that plastic bags should be banned completely and replaced with sustainable alternatives.	~25%
<b>Replacement with paper, textile or biodegradable bags</b>	A large portion called for the promotion of paper, cardboard or cloth bags as environmentally friendly options.	~20%
<b>Price increase of plastic bags</b>	Some respondents suggested that the current price of €0.05 is too low to influence consumer behavior and should be increased to €0.10–€0.20.	~10%
<b>Public awareness and environmental education</b>	It was proposed to develop awareness campaigns, especially in schools and the media, to reduce the use of plastic.	~8%
<b>Support for stricter policies and strong enforcement</b>	The comments called for sanctions against vendors who do not comply with the regulation and incentives for those who use ecological alternatives.	~7%
<b>Criticism of current politics</b>	A smaller group assessed the €0.05 fee as ineffective, partial, or unfair.	~5%
<b>Other practical suggestions</b>	They included ideas such as giving away the first bag for free, promoting reusable bags, or using recyclable materials.	~5%
<b>No comment or neutral (“No”, “No suggestion”)</b>	Respondents did not provide additional opinions.	~40%

The results show a high level of public awareness about the importance of limiting the use of plastic bags; however, the majority of respondents emphasize that current measures are insufficient to achieve sustainable behavior change.

The main trends emerging from the analysis are as follows:

A significant portion of the participants called for a complete ban on plastic bags, considering this to be the most effective way to protect the environment. According to them, the symbolic payment of €0.05 has not been enough to change the behavior of either consumers or traders. They suggested that institutions move towards a legal ban and the replacement of bags with alternative materials.

Many others proposed promoting the use of paper, textile or biodegradable bags, which maintain functionality but have a much lower impact on the environment. This category emphasized the need to support local producers in the development of these products through incentive policies and subsidies that facilitate the transition to greener alternatives.

Another group of citizens stated that the current price of €0.05 is too low and does not discourage the use of plastic bags. According to them, only a significant increase in the price, to the level of €0.10–€0.20, could have an educational effect and influence consumer behavior. Some also suggested that the first bag be free, while the others be subject to a fee, to balance environmental awareness with economic affordability.

A wide range of comments highlighted the importance of education and public awareness on the impact of plastics on the environment. Participants underlined that the pricing policy should not remain a fiscal measure alone, but should be accompanied by awareness programs in schools, the media and local communities, to build a new culture of responsible consumption.

Several respondents called for stricter monitoring and enforcement, as some traders still provide plastic bags for free or outside the established standards. This underlines the need for strengthening inspections and administrative fines, to ensure equal enforcement of the regulation for all economic operators.

A smaller proportion of citizens assessed the current policy as partial, ineffective or with minimal environmental impact, arguing that the measure has benefited traders more than the environment. They called for a review of the policy's transparency and social justice.

In conclusion, the findings show that citizens support the principle of reducing the use of plastic bags, but require improvements in several key areas such as strengthening enforcement and inspections, gradual price increases to influence consumer behavior, support for producers of ecological alternatives, and ongoing public education about the impact of plastics on the environment.

The discussion of the responses shows that Kosovar society is increasingly willing to embrace positive environmental changes, but expects these measures to be fair, reasonable and accompanied by practical actions. For MESPI and KEPA, this knowledge constitutes a valuable source of information for reviewing existing policies and developing new initiatives that promote sustainable materials, strengthen implementation and ensure active participation of citizens in environmental protection.

## 4.4. Methodology and Assessment Approach based on Retailer Data

### 4.4.1. Assessment Approach

The quantitative assessment is built on real data provided by the Office of the General Inspectorate, based on inspections and verified reports submitted to KEPA. These data represent official records collected by the Kosovo Market Inspectorate from 12 of the largest trading companies operating at the national level, which together are estimated to constitute around 80% of the total formal retail market.

The reported figures have been verified through field inspections conducted by market inspectors to ensure the reliability and consistency of the dataset. The total number of lightweight plastic carrier bags reported by these companies amounts to 49,995,838 units during the reference year 2024. Dividing this figure by the total population of Kosovo of 1,585,590 inhabitants, results in an average of approximately 32 plastic bags per person per year.

### 4.4.2. Assumptions based on market structure

To produce a comprehensive national assessment, adjustments were made to take into account market coverage and informal sector activity. These assumptions were developed based on insights gained from focus group discussions and interviews with producers, traders and inspectors, as well as references from reports on the informal economy in Kosovo.

Regulation for the formal market (20%)

- Since the initial data represents approximately 80% of the formal retail market, it was expanded by 20% to estimate the total consumption of the formal market. This 20% increase was derived from focus group discussions with traders, to provide a more accurate reflection of the overall market structure.<sup>1</sup>
- This adjustment includes small formal shops and other companies operating within the formal economy that were not included among the 12 largest traders covered in the initial data set.
- After including this additional formal market segment, the estimated total number of lightweight plastic bags sold or distributed increases to 62,494,797.5 units, corresponding to about 40 bags per person per year.

Regulation for the informal market (40%)<sup>2</sup>

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<sup>1</sup>It is worth noting that the author, with the support of GiZ and KEPA, conducted three thematic focus groups — with producers, retailers and inspectors — as well as a series of semi-structured interviews with institutional stakeholders. During these discussions, participants provided estimates of the approximately 20% of the formal market that was not covered by the data of the 12 largest supermarket chains in Kosovo, as well as information on the extent of informal economic activity related to the distribution of plastic bags. These consultations, together with references to existing reports on the informal economy in Kosovo, served as the basis for the assumptions used in the extrapolation process.

<sup>2</sup>According to the Kosovo Academy of Sciences and Arts (KASA), the shadow economy in Kosovo is estimated to be around 39.5%, based on the Shadow Economy Index. (see Mustafa, I., Shiroka-Pula, J., Krasniqi, B., Sauka, A., Berisha, G., Pula, L., Lajqi, S., & Jaha, A. (2019). Analysis of the shadow economy in Kosovo. Kosovo Academy of Sciences and Arts.). Also, according to estimates by the International Monetary Fund (IMF), the informal economy in Kosovo is estimated to be around 30–35% of GDP. IMF reports emphasize that this high level of informality is particularly present in the trade, agriculture, construction and services sectors, directly affecting fair competition, fiscal revenues and

- Based on stakeholder contributions, available economic studies and field monitoring conducted by the report authors together with the GIZ team, the informal trade sector — which includes small shops, bakeries, kiosks and local markets — was estimated to account for an additional 40% of the total plastic bag turnover.
- Many of these businesses continue to distribute free plastic bags, outside of official reporting mechanisms.
- After applying this regulation, the estimated total national consumption of lightweight plastic bags amounts to 87,492,716.5 units, corresponding to approximately 55 bags per person per year.

#### 4.4.3. Assessment Process

Table 5 presents the step-by-step estimation process that was used to calculate the total number of lightweight plastic bags used annually in Kosovo and the corresponding per capita averages. The data, obtained from the Office of the General Inspectorate through inspections conducted at the 12 largest trading companies, covers approximately 80% of the formal market and reports a total of 49,995,838 bags, representing approximately 32 bags per person.

To represent the full formal market, a 20% adjustment was applied, increasing the estimate to 62,494,797.5 bags, or approximately 40 bags per person.

Finally, to take into account the informal trade sector, which includes small shops, bakeries and local markets that usually distribute free plastic bags, an additional adjustment of 40% was added.

This brings the total estimated national consumption to 87,492,716.5 bags, corresponding to approximately 55 bags per person per year.

Thus, the table provides a progressive assessment framework, starting from data verified through inspections and incorporating assumptions based on focus group discussions, stakeholder input and field observations, to ensure that the final assessment reflects both formal and informal market dynamics.

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economic productivity (see IMF (2022). Kosovo: Staff Report for the Article IV Consultation. International Monetary Fund). According to the Regional Cooperation Council (RCC), the informal economy in Kosovo is estimated to be around 33%, ranking the country among the economies with the highest level of informality in the region (RCC, 2021). The informal economy in Kosovo ranges between 30% and 40% of GDP, ranking the country among the most informalized economies in the Balkans.

Table 5. Estimating the consumption of lightweight plastic carrier bags in Kosovo

Category	Calculation	Total number of bags consumed (sold or given away for free)	Average per capita (population = 1,585,590)	Explanation
<b>Total number of plastic bags (reported by 12 companies)</b>	Basic data set	49,995,838.00	≈ 31.5 → rounded to 32	It represents 80% of the formal market.
<b>Assessment for 100% of the formal market</b>	49,995,838 (adding 20% of the formal market)	62,494,797.5	≈ 39.4 → rounded to 40	20% is added to cover the untreated part of the formal market.
<b>Total national estimate (adding 35% informal market)</b>	62,494,797.5 + (adding 35% of the informal market)	84,367,977	≈ 53 bags/capita	35% is added for the informal sector (small shops, bakeries, etc.).
<b>Total national estimate (adding 40% informal market)</b>	62,494,797.5 + (adding 40% of the informal market)	87,492,716.5	≈ 55.2 bags/capita	40% is added for the informal sector (small shops, bakeries, etc.).

Source: Author's calculations based on data provided by the Kosovo Market Inspectorate and assumptions drawn from focus group discussions and field observations.

#### 4.4.1. Discussion and Implications

The results of this assessment show that the average annual consumption of lightweight plastic carrier bags in Kosovo is around 55 bags per person, when taking into account both formal and informal market activities. Although this figure remains below the EU average of 66.6 bags per person (Eurostat, 2022), it nevertheless reflects a significant level of plastic bag use, which continues to pose challenges for environmental protection and waste management.

The relatively lower figure compared to the EU average may reflect the early effect of Administrative Instruction (AI) No. 07/2023 (as amended and supplemented by AI No. 04/2025), which introduced regulatory measures for the production, sale and distribution of plastic bags, as well as increased awareness among large retailers.

Major supermarket chains have already started implementing pricing mechanisms, technical standards and reporting obligations, which appear to have reduced the use of plastic bags in the formal retail sector.

However, the analysis reveals that a significant portion of plastic bag circulation occurs within the informal economy, accounting for around 40% of total consumption. This sector — which includes small shops, bakeries, kiosks and local markets — often distributes plastic bags for free and remains largely outside of current monitoring and enforcement mechanisms. As a result, informal practices continue to undermine the effectiveness of the policy and distort official consumption data.

To strengthen the impact of Kosovo's regulatory framework and to align it more closely with EU environmental objectives, several key policy implications emerge:

- Strengthen monitoring and enforcement: Expanding the scope of inspections to include small and informal traders would ensure more complete oversight of the distribution and implementation of the plastic bag fee.
- Public awareness and behavior change: Campaigns that highlight the environmental impact of single-use plastics and promote reusable alternatives can further reduce demand, especially among small businesses and consumers.
- Improve data systems: Developing an integrated reporting mechanism through the Kosovo Environmental Protection Agency (KEPA) would enable standardization of data collection and reduce reliance on manual reporting.
- Incentives for green transition: Providing fiscal and technical support for small traders to switch to biodegradable or reusable packaging would accelerate market-level adoption.
- Continuous assessment: Conducting periodic assessments of plastic bag consumption should be institutionalized, to enable policymakers to measure the effectiveness of AI 07/2023 and adjust policy instruments as needed.

## **5. Policy Effectiveness and Impact Assessment**

### **5.1. Environmental Impact**

The assessment shows that Administrative Instruction (AI) No. 07/2023 has generated significant early environmental impacts, mainly through the reduction of plastic bag use in the formal trade sector. Retailer data show a significant reduction in bags distributed, while combined formal and informal calculations estimate that the current average annual consumption is around 55 bags per person, lower than the EU average (66.6).

Large supermarkets consistently enforce the rule: the fee is displayed at the cash register, bags are charged and labeled as required, and customers are regularly asked about the number of bags needed. The consumer survey supports these findings: 76.9% state that they now try to use fewer bags, while 63% say that the fee has directly influenced their behavior.

However, significant challenges remain in small-scale trade and the informal sector, where bags are often distributed for free, without labels and outside the formal reporting system. This weakens the environmental impact of the policy and slows progress towards the national target of 40 bags per person by 2030.

In summary, the measure has generated a significant reduction in consumption in the formal sector, changed consumer behavior, and set a clear early environmental signal, but requires strengthening of implementation among small operators to maximize its effect.

### **5.2. Social Impact**

AI No. 07/2023 has brought about significant changes in consumer behavior, creating new norms for the use of reusable bags and reducing plastic waste. Nearly 2/3 of citizens support the policy and around 57% say they would even support a complete ban on plastic bags. This shows increased social acceptance and readiness for more advanced measures. Environmental motivation is increasing because, based on surveys, around 56.7% of citizens declare that they bring their own bag for “environmental reasons”, not just to avoid paying. The €0.05 fee has functioned as a behavioral incentive, but public awareness remains uneven.

The findings also show a high level of dependence on small shops, where lack of enforcement creates perceptions of inequality and reduces trust in the masses. Many citizens highlight the need for better information, especially among small traders and communities that receive free bags from small neighborhood shops.

The main social benefit of the policy so far is the normalization of reusable behavior and the reduction of plastic bag use, which, with further educational support, could become a permanent practice.

### **5.3. Economic Impact**

The economic impact of AI No. 07/2023 is twofold:

(a) For consumers and businesses

The €0.05 fee has created a strong price signal that has reduced the demand for plastic bags. In the formal sector, usage has decreased significantly. However, the willingness to pay is low: only 9.7% buy bags willingly, while the majority avoid them by using reusable bags. This encourages responsible consumption, but creates pressure on the informal sector that continues to distribute free bags.

**(b) For local producers**

This is the segment most economically affected. Producers report a decline in production due to reduced demand in the formal market and competition from uncontrolled informal bags. Some companies highlighted the risk of production lines closing in the absence of technical and financial support. This change is positive from an environmental perspective, but creates transition challenges for the local industry. The policy has reduced consumption, but without supporting measures, it risks harming local producers and pushing the market towards substitution with imported products.

## **6. Conclusions and Recommendations**

### **6.1. Conclusions**

The findings of this assessment show that the policy for the reduction of plastic bags in Kosovo (AI No. 07/2023) has already generated noticeable changes in consumer and market behavior, within a relatively short period of implementation. The introduction of a fee of €0.05 for each lightweight plastic bag has significantly influenced the change in consumer behavior and has created a new environmental norm in formal retail networks.

The high level of compliance among large and medium-sized retailers, including supermarket chains, demonstrates that the regulation is enforceable and effective when clear monitoring, billing and labelling systems are in place. At these points of sale, consumers are regularly asked how many bags they wish to purchase, and the cost is clearly displayed at the checkout, indicating a sustained cultural shift towards conscious consumption.

However, non-enforcement remains widespread among small and informal traders, especially in bakeries, neighborhood shops and open markets, where plastic bags are still distributed for free, unlabelled and unregistered. This creates uneven enforcement, weakens the deterrent effect of the policy and keeps a significant proportion of plastic bags in circulation that evade formal monitoring.

The continuation of these practices reflects both a lack of awareness among small businesses and deficiencies in inspection capacities at the municipal and national levels. Furthermore, technical non-compliance remains present even among traders who formally comply with their obligations.

Some supermarkets continue to use very thin (<25 microns) bags with handles, which are prohibited by AI No. 07/2023. The lack of clear technical instructions and product classification has caused confusion among both store managers and suppliers.

From a production perspective, plastic bag manufacturers report declines in sales and production following the imposition of the tariff.

Although this result shows progress in reducing consumption, it also highlights the economic challenges of adjustment for local producers, who must now adapt to new market dynamics.

Supporting these companies in the transition towards biodegradable and reusable products will be essential to maintain the balance between environmental objectives and economic sustainability.

The results of the consumer survey reinforce these findings from the field.

About 77% of respondents report that they now try to use fewer plastic bags, while 65% express a positive attitude towards the policy.

However, around 40% consider the current tariff too low, suggesting that the existing economic signal may not be sufficient to encourage further reductions in usage.

The survey also shows a limited level of understanding of the environmental purpose of the policy among some demographic groups, highlighting the need for public awareness and education campaigns.

Overall, the data show that AI No. 07/2023 has successfully managed to change consumer behavior in formal sales networks, but systemic problems such as data fragmentation, uneven implementation, and insufficient institutional coordination continue to limit its full effectiveness.

Addressing these challenges will be essential to achieving Kosovo's objective of further reducing plastic bag consumption per person per year and aligning national practices with EU environmental standards and the circular economy agenda.

## **6.2. Recommendations**

Based on the findings of this evaluation, several recommendations are presented aimed at strengthening the effectiveness, implementation and long-term sustainability of Administrative Instruction No. 07/2023. These actions aim to ensure that the regulation brings sustainable environmental impact, fair implementation across all segments of traders, as well as better inter-institutional coordination. These actions will:

### **1. Strengthen inspection and enforcement capacities.**

- a. Create a structured inspection program targeting small traders and bakeries.
- b. Create a graduated enforcement system, combining informational visits, formal warnings and fines.
- c. Conduct joint inspection campaigns with the participation of KEPA, the Market Inspectorate and municipal authorities.

### **2. Clarify and harmonize technical standards.**

- a. A technical instruction should be issued that specifies the permitted types of bags, the minimum thickness of the material, and labeling standards.
- b. Include visual examples and compliance checklists to assist both inspectors and traders.

### **3. Improve data collection and inter-institutional coordination.**

- a. Develop a common digital reporting platform, connecting Customs, TAK, KEPA and inspectorates.
- b. Require quarterly reporting from large traders and registered manufacturers on sales, imports and types of materials.
- c. Conduct an annual survey with a representative sample of consumers to measure the impact of policy changes.

### **4. Support local transition and innovation.**

- a. MESPI should launch programs that offer small grants or technical assistance to plastic bag manufacturers who invest in biodegradable or reusable products.
- b. Initiate public-private partnerships to develop domestic production lines with environmentally friendly materials.

### **5. Increase consumer awareness and education.**

- a. Implement national information campaigns explaining the purpose and impact of the €0.05 fee.
- b. Launch programs with communities and schools that promote the use of reusable bags and sustainable consumption.

- c. Collaborate with markets to place reminders at points of sale and small incentives for customers who bring their own bags.

To ensure full compliance and sustainable progress, future actions should focus on expanding inspections to small businesses, strengthening enforcement mechanisms, clarifying technical standards, and supporting domestic producers through financial and technical assistance during the transition to sustainable alternatives.

Overall, these measures will ensure that Kosovo's plastic bag reduction policy is implemented fairly, based on accurate and consistent data, through institutional implementation and public engagement. They will also strengthen the country's progress towards EU-aligned environmental standards and a more circular and resource-efficient economy.

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