

Waste Management

Overview

A new Law on Waste Management[78] was adopted in December 2025, enabling the import of non-hazardous waste for energy-recovery purposes. The Law failed to adequately capture the complexity of the overall waste management system, resulting in an amendment process being initiated just five months after its enactment.

In 2025, the number of registered landfill fires reached a new record of 2,217,[79] indicating that an average of six landfills caught fire daily across Serbia.

The financing system for the treatment of products that become special waste streams after use has been amended. This systemic shift has caused operational issues for certain recyclers, resulting in a months-long "vacuum". During this time, the generation of this type of waste continued, but without a clear picture of how its treatment would be funded. Consequently, this led to the stockpiling of such waste at generator sites and its inadequate disposal in the environment.

Inspection supervision was primarily focused on business entities and entrepreneurs, whereas cases of non-compliance with legal provisions by local self-government units still remained without adequate reactions and sanctions.

Strategic and Legislative Framework

The adoption of the new Law on Waste Management was a key event that marked the observed period from June 2025 to June 2026. Although the

78 Law on Waste Management, Official Gazette of RS, no. 104/2025 (https://pravno-informacioni-sistem.rs/eli/rep/sgrs/skupstina/zakon/2025/109/35/reg)

79 Ministry of Interior – Response to the Request for Access to Information of Public Importance 07.7 Number 35/2026 of February 24, 2026.

enactment of a new law had long been advocated and featured as a recommendation in previous Shadow Reports, the solutions it introduced and/or redefined were not used as an opportunity to substantially improve the regulatory framework for environmental protection. The entire process started as amendments to the existing Law, but ended with passing a new Law on Waste Management, whereas the Working Group[80] created to directly participate in this process never had the opportunity to see the draft of the new Law on Waste Management, and instead provided comments on the current Law. Furthermore, the Ministry of Environmental Protection held a clear position as to which comments and proposals would be incorporated in the proposed Draft, stating that the final decision would be made by the Cabinet of the Minister of Environmental Protection, irrespective of the views expressed within the Working Group.

The speed at which other institutions approved the draft of the new Law on Waste Management suggests an intention to fast-track a major change – the import of non-hazardous waste for energy-recovery purposes, which had been prohibited prior to the enactment of this law. At the Working Group, proponents of importing waste for energy recovery were the Provincial Secretariat for Urban Planning and Environmental Protection of the Autonomous Province of Vojvodina, the Chamber of Commerce and Industry of Serbia, and the Association of Serbian Energy-Intensive Industry, while representatives of civil society organizations opposed the proposal. Allowing waste imports for energy recovery proves that the existing system is incapable of generating sufficient quantities of RDF/SRF fuel from domestic waste. The lack of will among local authorities, which are responsible for municipal waste, combined with a weak oversight from higher levels of government, has led to a situation where waste in Serbia largely continues to be disposed of in unsanitary and illegal landfills, rather than being processed into alternative RDF/SRF fuel for which there is a demand in the domestic industry.

The working method of the Working Group is yet another confirmation that the relevant institutions still view the civil society and other stakeholders'

80 Decision on the Establishment of the Working Group for Drafting the Law on Amendments to the Law on Waste Management (https://www.activity4sustainability.org/wp-content/uploads/2025/09/Resenje-o-formiranju-radne-grupe-ZuO.pdf)

involvement in the regulatory drafting process merely as a box-ticking exercise. The Working Group for Drafting the Law on Amendments to the Law on Waste Management was established on August 29, 2025, and held its first meeting as early as September 2 of the same year. Out of a total of 46 members, civil society organizations had only three representatives, whereas the Ministry of Environmental Protection, together with one representative from the Environmental Protection Agency – which operates under its direct control – held an absolute majority of 24 members. Adding 10 representatives from other ministries to this number renders the disproportionate ability to voice opinions outside of ministerial offices clearly evident. The business sector had six representatives in the Working Group, predominantly from companies that are members of the Association of Serbian Energy-Intensive Industry, while the Chamber of Commerce and Industry of Serbia, public utility companies, and the Provincial Secretariat for Urban Planning and Environmental Protection of Autonomous Province of Vojvodina each had one representative; the Working Group meetings took place on a weekly basis, clearly demonstrating the urgency.

The fact that the process of drafting amendments and forming a new working group for the Draft Law on Amendments to the Law on Waste Management started as early as May 2026 – just five months after its adoption – demonstrates that the new Law on Waste Management was not based on a comprehensive system overview.

Regarding secondary legislation and bylaws, the new Law sets a one-year deadline for the adoption of new regulations stipulated therein (Article 112) and for legal entities and individuals to align their business operations with the new Law (Article 111), whereas other bylaws enacted pursuant to the old Law remain in force until new ones are adopted (Article 113). Aligning with a new Law, followed by the adoption of further amendments to the Law that will require yet another round of harmonization in a very short timeframe, places a heavy burden on the entire waste management system. The waste management system itself has been struggling with a severe lack of capacity for many years. This hurried way of passing laws, without a broad social dialogue and an overview of the entire waste management system, further complicates enforcement and increases the risk that the regulations will remain a dead letter.

Implementation of Regulations

The systemic neglect of municipal waste management issues is highlighted by the number of registered landfill fires, which breaks records year after year: 2,171 fires were recorded in 2024, with the figure rising to 2,217 in 2025, according to data from the Ministry of Interior. This implies that throughout 2025, six landfills caught fire on average each day in Serbia, causing direct harm to the environment and public health.

Recognizing the gravity of this environmental issue, the United Nations Environment Programme (UNEP) partnered with other organizations in 2025 to launch the project Promoting Policy Solutions for Circularity and Sound Agricultural and Municipal Waste Management for Improved Urban Air Quality and Resilience to Health, Economic, and Social Shocks in Selected Beneficiary Countries in Asia-Pacific and the Western Balkans. The project is implemented in Serbia, India, and Bosnia and Herzegovina, and its goal is to curb the adverse effects of landfill fires and agricultural organic waste burning on air pollution and public health through the enhancement of systemic policies in each of the participating countries.

In addition to the previously listed regulations, two other important acts were adopted in the reporting period: the Regulation on Waste Lists for Cross-Border Movement, Content and Appearance of Instructions for Filling Out the Notification and the Document Accompanying the Cross-Border Movement of Waste (Official Gazette of RS, no. 19/2026) and the Rulebook on Medical Waste Management (Official Gazette of RS, no. 30/2026). The enforcement of these rules is expected to contribute to enhancing the waste management system, with a particular focus on governing medical waste handling and the cross-border movement of waste.

The primary publication for tracking waste management in Serbia is the Report on Waste Management in the Republic of Serbia, prepared and published

annually by the Environmental Protection Agency. Although the waste management data submission process is largely digitalized and subject to a legally mandated deadline (March 31 of the current year for the preceding year), the 2024 waste quantities data and waste management status-related reports were not released until November 2025 – eight months past the statutory deadline.

Unfortunately, practice shows that when the civil society sector requests certain public data from this field ahead of the Report's release - using the official procedure for accessing information of public importance - the Ministry of Environmental Protection delays their delivery until the annual report is published, despite a complete lack of legal basis for this practice under current regulations. The late release of data and the failure to provide requested information prior to the report's publishing prevent the monitoring of waste management status – both regarding quantities of waste generated, treated, exported, or imported, and regarding the legal entities responsible for these activities. This reduces the overall transparency of the system and the ability to track its development. In practice, this means that in July 2026, the public only has access to data from 2024, while data for 2025 – which were legally required to be submitted to the Environmental Protection Agency by March 31, 2026 –remain available only to a select group of institutional insiders.

Inspection Supervision

The 2025 Report on the Work of the Environmental Protection Inspectorate[81] was published in January 2026.

The Report indicates that throughout 2025, regular inspections were conducted for licensed waste management operators (collection, transport, storage, treatment, and disposal of waste), alongside preventive activities carried out by the inspectorate.

Following the notification from the Environmental Protection Agency, the Environmental Supervision and Preventive Action Department processed the

81 Report on the Work of the Environmental Protection Inspectorate, https://www.ekologija.gov.rs/sites/default/files/inline-files/Godisnji%20Izvestaj%20o%20radu%20Inspekcije%20za%20zzs%20za%202025.pdf

1,792 cases involving legal entities and entrepreneurs - importers of products that become special waste streams after use - who failed to comply with their legal reporting requirements with respect to the National Register of Pollution Sources for the 2023 reporting year. Pursuant to the Law on Fees for the Use of Public Goods, requests to initiate misdemeanor proceedings have been filed with the misdemeanor courts of competent jurisdiction.

Out of all the requests filed, the Department received hard-copy first-instance rulings from misdemeanor courts concerning 809 legal entities. Of that number, requests were rejected in 583 cases. Proceedings were dismissed in 45 cases, and in three cases the courts declared a lack of territorial jurisdiction. In 30 cases, additional information was requested by the courts, in four cases witness summons were issued, while in three cases the proceedings were stayed.

Proceedings for the remaining 141 legal entities ended in verdicts: in four cases, the defendants were found not liable, 88 cases resulted in fines, and in 49 cases formal warnings were issued.

The law clearly stipulates the obligation of local self-government units to keep records of municipal waste and report the data from these records to the Environmental Protection Agency no later than March 31 of the current year (Article 94). Without an adequate response from the relevant authorities, this legal regulation remains unimplemented, and a large number of local self-government units will continue failing to submit the requested data. To date, we have not been able to find any record that this behavior has triggered any inspection response or sanction, other than the fact that the violation of this legal obligation repeats year after year.

Financing

Following the adoption of the Regulation on the Cessation of Validity of the Regulation on the Amount and Conditions for the Allocation of Incentive Funds on December 26, 2025 (Official Gazette of RS, no. 118/2025), the existing system

for financing recycling incentives for special waste streams ceased to operate, creating thereby a regulatory vacuum in the management of the waste previously falling under the scope of this regulation. As a result of this decision, the majority of recycling companies stopped accepting these types of waste and laid off a significant number of workers, with the consequences rippling across the entire network of collectors. On June 4, 2026, the Serbian Government passed a Regulation on the Type, Criteria, Amount, Elements, Conditions, and Manner of Allocating Incentive Funds to Waste Reuse and Recovery Operators for the Period from 2026 to 2028 (Official Gazette of RS, no. 49/2026). Pursuant to the Regulation, the Ministry of Environmental Protection announced on June 17, 2026 a Public Call for the allocation of de minimis aid to waste reuse and recovery operators for 2026, with the application deadline set for July 1, 2026.

This approach brings up numerous concerns, a key one being: how will authorities handle waste produced during the transition gap between the old system ending on December 25,2025, and the new one taking effect? Regardless of the legal and financial "vacuum" (which lasted at least six months), special waste streams, largely comprising hazardous waste, will not stop being generated because the system change was clearly neither time-synchronized nor carefully planned. The question also arises as to what will happen to the fees paid by citizens for the disposal of products that become special waste streams after use which the state continued to levy despite failing to establish a system to ensure they are used for their intended purpose. This issue persists across other environmental sectors as well, because since the abolition of the Environmental Protection Fund in 2012, revenues collected through various "environmental" taxes and fees have been systematically redirected to other costs that have nothing to do with environmental protection.[82] Furthermore, the very formulation of financial support for the treatment of special waste streams as de minimis aid is itself questionable.

82 Environmental protection investements: a social and fiscal priority https://www.fiskalnisavet.rs/doc/analize-stavovi-predlozi/FS-Investicije-u-zastitu-zivotne-sredine.pdf

Recommendations

Strategic and Legislative Framework

1. Build partnerships with the civil society and business sectors in the regulatory process, as well as clear public communication based on dialogue backed by arguments and facts.
2. Encourage industry involvement in applying circular economy principles and provide funds from the budget of the Republic of Serbia to carry out activities planned by the program.
3. Adopt clear guidelines for keeping records of the takeover of hazardous waste from individuals.

Implementation of Regulations

4. Analyze the impact of facility operations on resolving hazardous waste treatment challenges in Serbia.
5. Ensure capacities for the management of hazardous waste in Serbia and analyze the contribution of existing and planned facilities to meeting treatment needs, particularly in the context of the expected ban on hazardous waste exports.
6. If the export of hazardous waste is unfeasible, provide capacities for its treatment and permanent disposal within the Republic of Serbia, accompanied by an assessment of how existing and planned facilities address the hazardous waste treatment needs in Serbia.
7. Provide financial support to the civil sector and resolve the ongoing administrative dispute initiated over the allocation of funds contrary to the call for proposals' terms as soon as possible.

8. Conduct a detailed investigation into the failures in the operation of the Regional Waste Management Center Duboko Užice, identify responsible persons and take appropriate actions in accordance with the law, including penalties for those responsible for the identified irregularities. Ensure transparency regarding all data and information relevant to establishing facts and accountability throughout the entire process.

Financing

9. Instead of relying on credit arrangements, build the capacities and ensure political backing to leverage available EU funds and grants for infrastructure development, with absolute transparency regarding the process and all associated expenses.

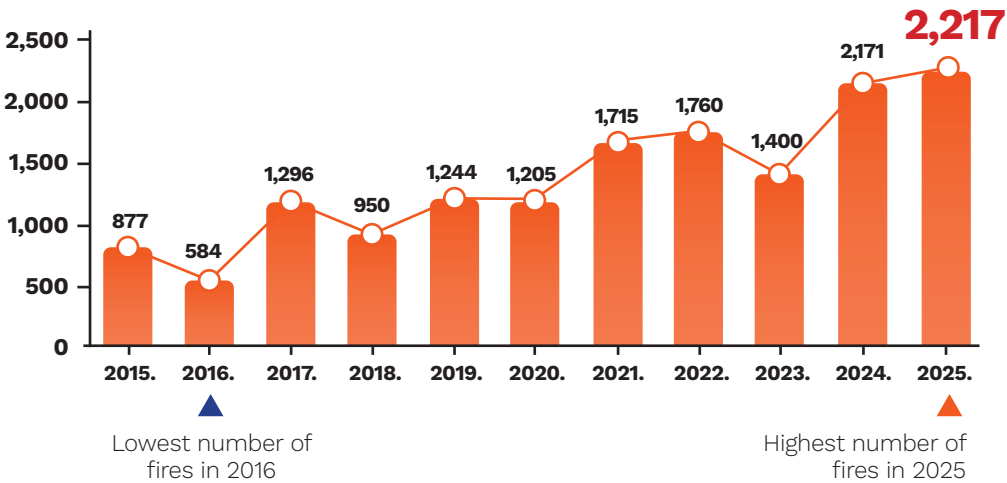
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877
fires in 2015

2,217
fires in 2025

NUMBER OF REGISTERED LANDFILL FIRES IN SERBIA (2015–2025)



2.5 times as many **fires** as in 2015