Western Balkans: EU, Environment & Accession

2 JULY 2026

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The Western Balkan EU accession candidates (Albania, North Macedonia, Montenegro, Serbia, Bosnia and Herzegovina) together with Kosovo, as a potential candidate, face significant challenges in meeting the EU's environmental and climate requirements. Compared with previous enlargement rounds (see Southern accession candidates; Börzel, 2009), they face higher standards for implementing environmental legislation (Đurčević Cucić, 2024). Although all have adopted important legislation in recent years, including waste management laws, transpositions of the Water Framework Directive and national climate plans, implementation, enforcement and funding remain inconsistent. Persistent gaps in environmental impact assessments, industrial pollution, air quality and waste separation (Belis et al., 2024) are compounded by weak environmental administrations and shortages of specialist staff (Belis et al., 2024).

This briefing examines EU enlargement through the lens of environmental policy in the Western Balkans. It argues that environmental policy is central to accession negotiations and candidate status. While the region has adopted a Green Agenda and other roadmaps to align with EU environmental objectives, implementation ultimately depends on domestic political structures and political commitment. Despite differences between countries, all face common challenges in meeting Chapter 27 requirements, particularly in governance, conflicting political and economic priorities, and financial constraints.

The primary framework governing the EU's engagement with the Western Balkans is the Stabilisation and Association Process (SAP), designed to integrate the Western Balkans into the EU's broader area of peace and stability. It pursues this through three core objectives: stabilising countries and facilitating their transition to market economies; promoting regional cooperation; and ultimately offering a credible pathway to EU membership (Baker, 2015). In practice, the SAP functions as a blueprint, guiding candidate countries in building the institutional and administrative capacity needed to meet European and international standards, including those related to environmental governance, and to adopt and implement EU law.

Central to this process are Stabilisation and Association Agreements (SAAs), which establish binding rights and obligations for candidate states, including the alignment of national frameworks with EU environmental standards (Baker, 2015).

Accession is contingent on satisfying the Copenhagen Criteria, through which the EU applies two distinct forms of conditionality (Baker, 2015; Carmin & VanDeveer, 2004). Democratic conditionality requires candidate states to demonstrate respect for human rights, the rule of law, and democratic principles. The second, *acquis* conditionality, mandates that the entire body of EU law must be transposed into national legislation. Where full membership remains aspirational, policy conditionality offers intermediate incentives such as visa liberalisation or improved market access to encourage compliance (Baker, 2015). Progress is tracked through regular Commission reports, which identify legislative gaps and allow countries to be assessed comparatively. Where necessary, more assertive instruments such as public criticism or reputational pressure may also be deployed to encourage reform (ibid).

Environmental requirements form a critical dimension of both the SAP and the SAAs. Chapter 27 (Environment and Climate Change) is widely regarded as one of the most technically demanding areas of the accession negotiation process, requiring candidate countries to align with more than 300 legislative acts (Kerekes & Kiss, 2000; ten Brink, 2002). Compliance entails first the adoption of overarching environmental framework legislation, but also the fulfilment of sector-specific obligations spanning water quality, industrial pollution, air quality, waste management, energy efficiency, and nature protection, among others. For industrial pollution, the obligations

entail the implementation of the Integrated Pollution Prevention and Control (IPPC) directive requiring candidates to adopt best available techniques (BATs), whilst, to improve air quality, they include the reduction of emissions from power generation and urban transport (Kerekes & Kiss, 2000).

In terms of nature protection and biodiversity preservation, the Chapter concerns the creation and management of protected areas and alignment with the Nature 2000 network (Carmin & VanDeveer, 2004). The scale of investment this requires should not be underestimated: in Serbia, for instance, the water sector alone is estimated to demand approximately €5.9 billion to meet EU standards under the Water Framework Directive (2000/60/EC) (Baker, 2015; Pendić et al., 2014). This process of regulatory 'extra-territorialisation' serves, inter alia, to address 'soft security' concerns, such as nuclear risks and transboundary pollution, by extending the EU's regulatory reach beyond its formal borders. By framing environmental conditionality as non-negotiable, the EU effectively compels the modernisation of administrative structures and physical infrastructure in candidate countries well before formal accession and thus incentivises a smoother accession process (Baker, 2015).

The EU promotes environmental compliance among Western Balkan candidates through what Börzel & Buzogány (2019) theorizes are two complementary strategies: enforcement, based on monitoring and sanctions, and management, based on capacity building (Börzel & Buzogány, 2019). The enforcement approach assumes states weigh the costs of compliance against the benefits of membership, while the management approach views implementation gaps as resulting primarily from limited administrative and technical capacity rather than political unwillingness. Accordingly, the European Commission increasingly prioritises capacity building over sanctions, finding it more effective in reducing the implementation gap (Börzel & Buzogány, 2019).

Enforcement centres on acquis conditionality, and reflects what is sometimes described as the 'extra-territorialisation' of EU governance by requiring candidates to reform their legal and administrative systems before membership. Where accession remains distant, the EU exercises leverage through policy conditionality by making access to the benefits of EU integration contingent on demonstrable compliance with the acquis (Baker, 2015; Börzel & Buzogány, 2019).

The management approach is evident in the EU's use of technical assistance instruments such as Twinning Programmes and TAIEX. By pairing domestic officials with counterparts from EU environmental leaders such as Denmark or Sweden, the Twinning Programmes aim to transfer best practices and internalise EU norms (Börzel & Buzogány, 2019). TAIEX (Technical Assistance and Information Exchange) provides short-term expert support to strengthen the legal and institutional frameworks needed to implement environmental legislation. Both instruments, successful during the Eastern Enlargement, are now central to the Western Balkans strategy of

ensuring that environmental laws are backed by effective institutions rather than becoming "dead letters" (Börzel & Buzogány, 2019; Baker, 2015).

Financial assistance complements these measures. As Chapter 27 is among the most investment-intensive areas of accession, funding is channelled primarily through the Instrument for Pre-Accession Assistance (IPA), which supports environmental infrastructure such as wastewater treatment and waste management facilities (Baker, 2015). In the Western Balkans, IPA funding is supplemented by the Economic and Investment Plan (EIP), providing an additional €9 billion in grants and guarantees for priorities including the transition to renewable energy and the modernisation of waste and wastewater systems. Both instruments remain subject to project conditionality, allowing the EU to suspend funding if reform commitments are not met and thereby maintain leverage within the management framework (Börzel & Buzogány, 2019).

According to the European Commission's progress reports, Western Balkan countries have made considerable progress in transposing the EU environmental acquis into national legislation. Key milestones include the adoption of the Declaration on the Green Agenda for the Western Balkans at the Sofia Summit in 2020 and a regional decarbonisation roadmap in 2021 (Uvalić, 2023). The Green Agenda commits the region to supporting the EU's goal of climate neutrality by 2050 through the transition to sustainable, carbon-neutral economies (Regional Cooperation Council, 2020), with financial support provided through the EIP.

Despite legislative progress, implementation and enforcement remain weak. The European Commission identifies persistent shortcomings in air quality, waste management, water treatment, biodiversity protection, climate action and environmental impact assessment procedures (Belis et al., 2024)[a][b]. Progress varies across candidates due to differences in accession status, administrative capacity, political commitment and regulatory effectiveness. To date, only Montenegro and Serbia have opened negotiations on Chapter 27 (Belis et al., 2024).

A country's level of democracy also appears to influence progress in environmental policy alignment (Dosti et al., 2024). North Macedonia, the region's most democratic country, records the highest environmental performance, whereas Bosnia and Herzegovina ranks lowest on both measures (Dosti et al., 2024, p. 41). Nevertheless, all Western Balkan candidates remain below the EU member states' average Environmental Performance Index score of 60.8 (Dosti et al., 2024, p. 38).

Compared with previous accession rounds, Western Balkan states face three main challenges: limited administrative capacity and governance weaknesses, conflicting political and economic objectives, and financial constraints.

Institutional capacity remains weak across both national and local levels (Baker, 2015). In Serbia, around 80% of municipalities have almost no capacity to meet environmental requirements, while only about 10% have "decent" capacity (Pendić et al., 2014). Limited human resources in energy, climate and environmental policy further hinder implementation of the Green Agenda for the Western Balkans by restricting the preparation of environmental impact assessments and "mature projects" (Uvalić, 2023). Börzel & Fagan (2015) argue that weak state structures and civil societies reduce candidates' ability to implement EU environmental policies (Börzel & Fagan, 2015, p. 892). Given the region's post-socialist legacy, environmental governance also requires "substantial state building" (Börzel & Fagan, 2015, p. 889), meaning institutions that function comparably to those of EU member states. While the EU promotes behavioural change, compliance ultimately depends on domestic institutions. The involvement of external actors such as the World Bank, the European Bank of Reconstruction and Development and the US further complicates environmental governance (Börzel & Fagan, 2015).

Conflicting political and economic priorities also create tensions. Governments seek foreign investment, tourism, energy security and economic growth to reduce income disparities with the EU, but these goals can conflict with environmental protection. Albania's "Flamingo Revolution" illustrates this tension, with protests opposing tourism development in ecologically sensitive coastal areas (see Sazan Island). While the government highlights economic benefits, environmental groups and local communities argue that the project threatens biodiversity and violates the Birds and Habitats Directives. Consequently, the European Commission warned that Albania's actions could affect its ability to close Chapter 27 and advance its accession process (EWB, 2026). The case also demonstrates how environmental issues increasingly intersect with governance and political stability. Environmental degradation is increasingly viewed as a "soft security" threat capable of destabilising the region (Baker, 2015), while corruption, clientelism and organised crime further weaken rule-of-law

enforcement and environmental reforms (Metushaj & Luli, 2024).

These challenges are compounded by significant financial constraints. Adopting the environmental acquis is estimated to cost 2–3% of annual GDP (Carmin & VanDeveer, 2004; ten Brink, 2002; Dosti et al., 2024). Combined with ageing post-communist infrastructure, historical pollution and post-conflict conditions (Baker, 2015), this places a substantial burden on public finances. Although the EU provides support through the EIP, limited public budgets raise doubts about governments' ability to co-finance environmental and climate projects (Uvalić, 2023).

Overall, Western Balkan candidates' implementation of EU environmental policies is constrained by limited financial and administrative capacity, corruption, clientelism and ethno-territorial conflict (Börzel & Fagan, 2015, p. 892).

The SEE 2020 Strategy is the region's most significant effort to integrate environmental management with EU accession by promoting resource efficiency, the energy transition and infrastructure modernisation (Baker, 2015). It frames environmental compliance as a driver of regional competitiveness rather than an external obligation. However, critics argue that this ecological modernisation approach risks prioritising economic growth over the structural changes required for genuine sustainable development (Baker, 2015). Its ambitions are further limited by administrative weaknesses, financial constraints, and internal political and ethnic divisions that hinder regional cooperation. In addition, enlargement fatigue among EU member states has made accession prospects more uncertain, weakening the incentives on which both SEE 2020 and the broader accession process depend (Vangelov, 2025). Without a credible membership perspective, the leverage of EU conditionality in driving environmental reform is significantly reduced.

This suggests that the environmental objectives of SEE 2020 are inseparable from the broader political and democratic conditions assessed under the Copenhagen Criteria. In practice, progress in governance and environmental compliance is mutually dependent.

Aligning with EU environmental standards is central to Western Balkan accession yet remains obstructed by administrative limitations, governance structures, financial constraints and diverging interests. Closing the gap between legislation and implementation requires the EU to maintain a credible enlargement horizon, pair conditionality with capacity-building investment and support democratic reforms on which environmental progress fundamentally depends.

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[b]Works!

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