# Situational Analysis

Inter-Municipal Cooperation in Regional Waste Management in the Pelagonia and South-West Planning Regions

# INTRODUCTION

The situation analysis has been prepared within the framework of the *project* '*Sustainable municipal waste management services*', which aims to contribute to sustainable public services, alignment with EU legislation and promote environmental responsibility among the population. The project also strengthens local democracy by improving administrative capacity, public participation and integrating gender and human rights in waste management.

The main objective of this analysis is to support the strengthening of inter-municipal cooperation (IMC) in waste management in the South-West and Pelagonia regions of the Republic of North Macedonia. The analysis provides a basis for supporting municipalities in implementing the priority activities of their Local Action Plans (LAPs) by identifying opportunities for joint inter-municipal initiatives. The aim of the analysis is to determine which activities of the LAPs of the 15 municipalities are involved The project[1] can be implemented through inter-municipal cooperation and thus support the gradual establishment of a regional approach to waste management. In this way, it contributes to more integrated, cost-effective and regionally harmonized waste management services.

The situational analysis is aimed at identifying ways to improve the coordination, efficiency and integration of municipal services in line with regional priorities and national strategic documents within the framework of inter-municipal cooperation. In doing so, the focus is on an analysis highlighting opportunities for inter-municipal cooperation based on the priorities identified in the LAPs of the 15 municipalities.

The analysis covers the following documents and relevant legislation:

1. Law on Waste Management
2. Draft National Waste Management Strategy 2024–2036
3. Waste Management Plan of the Republic of North Macedonia 2021–2031
4. Operational Regional Waste Management Plan for the Pelagonia and South West Regions
5. Local Action Plans for Waste Management of the 15 Municipalities
6. Analysis of existing forms of cooperation in the environment and utilities (2013–2025)
7. Assessment of the capacities of the pilot municipalities[2]
8. The Law on Intermunicipal Cooperation and other related regulations

This Situation Analysis lays the groundwork for making recommendations and identifying practical models of inter-municipal cooperation that will help municipalities to provide a more efficient, self-sustaining and regionally functioning waste management system.

[1] A total of 15 municipalities from the Pelagonia and South-West Plani regions are included in the project, of which 6 municipalities (Bitola, Kichevo, Ohrid, Prilep, Plasnica and Novaci) are pilot municipalities with which the project closely cooperates and are beneficiaries of direct support, and an additional 9 municipalities (Mogila, Debrca, Vevchani, Krushevo, Dolneni, Resen, Struga, Krivogashtani and Demir Hissar) are beneficiaries of the good practices implemented in the pilot municipalities

[2] Bitola, Kichevo, Ohrid, Prilep, Plasnica and Novaci

## ABRRIVIATIONS

LIMC – Law on Intermunicipal Cooperation

LWM – Law on Waste Management

RSWM – Regional System on Waste Management

NWMS – Narional Waste Management Strategy

SWM – Solid Waste Management

MEPP – Ministry  on Environment and Physical Planning,

RPWM – Regional Plan on Waste Management

EU – European Union

LED – Local Economic Development

JWB – Joint Working Body

IMWMB – Inter-Municipal Waste Management Board

PUC – Public Utility Company

JPUWM – Joint Public Utility for Waste Management

RPUC – Regional Public Utility Company

LAP – Local Action Plan

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# 1. SUMMARY CONCLUSIONS

This chapter presents the summarized conclusions from the analysis of key regional waste management documents and the role of inter-municipal cooperation.

The analysis of the Law on Waste Management shows that the legislative framework clearly positions inter-municipal cooperation as a mandatory and systemic mechanism for establishing an integrated regional model of waste management. Through the political-strategic action of the Inter-municipal Waste Management Boards and the technical role of the Organizational Unit for Regional Waste Management, the law creates an institutional architecture that should ensure long-term stability and coordination between municipalities[3] Regional planning, integrated infrastructure network, public service, inspection supervision and financing are defined as areas in which cooperation is necessary to achieve economies of scale, harmonized practices and rational use of resources. The law, by allowing state intervention if the inter-municipal system does not work, confirms the necessity of coordinated regional models.

The National Waste Management Strategy 2024–2036 acknowledges the regional approach as the primary driver of the reform, but does not sufficiently recognize the Law on Inter-Municipal Cooperation, although in practice many of the identified challenges can be overcome through such forms of association. The strategy identifies fragmentation, poor equipment and limited financial capacity as systemic barriers, but at the same time opens up a significant opportunity through envisaged state support to encourage inter-municipal initiatives. Although it emphasizes the role of the organisational unit and the Inter-Municipal Board, the strategy does not provide a clear picture of their institutional structure, human resources and capacities required. However, in the realm of data, public awareness, extended producer responsibility and infrastructure planning, the importance of coordinated local policies is clearly imposed, especially as regional bodies consolidate.

The analysis of the National Waste Management Plan 2021–2031 further reinforces the picture of the need for multi-layered coordination – local, regional and interregional. The plan establishes the establishment of a joint waste management region in the Pelagonia and South West Planning Regions. The Plan also recommends the use of shared resources between multiple regions in cases where waste volumes, logistical requirements, or economies of scale justify it. Although the Plan does not explicitly integrate the Law on Inter-Municipal Cooperation, its implementation largely depends on forms that are closely related to the IMC, such as common logistics solutions, harmonized data methodologies, coordinated public campaigns and the creation of joint inspection capacities. The analysis points to the significant role that the IMC can play in the transition period before Organizational Units become fully functional. In addition, functional analysis is singled out as a prerequisite for determining which tasks must be carried out at the regional level and which can be carried out temporarily through inter-municipal cooperation.

The Regional Operational Plan confirms the adaptable nature of inter-municipal cooperation, showing that different types of activities require different forms of association. Preparatory phases such as analysis and mapping are often carried out through working bodies and committees, while hiring external expertise or conducting technical studies requires pooling financial resources (joint funding). Operational and infrastructure activities, such as the procurement of equipment, vehicles, and joint performance of services, necessitate stronger institutional models. According to operational priorities, the IMC is a complementary mechanism that reinforces the roles of the Inter-Municipal Board and the Organizational Unit, allowing for a dynamic approach in choosing the IMCt appropriate form for each activity. At the constituent session of the Inter-Municipal Waste Management Board (IMO) of the Pelagonia and Southwest Regions held on 10 December 2025, general consent was provided for the

[3] Municipalities, municipalities in the city of Skopje and the city of Skopje

elaboration of a new regional waste management plan for the next 6 years for the two regions, the preparation of which will begin in March 2026. The work of the board and the development of the new plan is supported by the project 'Sustainable municipal waste management services', funded by Sweden and implemented by SALAR International.

The analysis of the local action plans of the 15 municipalities shows that due to the large number of proposed cooperations, their further prioritization is necessary, especially since the municipalities are at different stages of preparedness and capacities. IMCt of the proposed initiatives are aimed at analytical preparation and plan development, which is expected at a time when the regional system is still being established. Municipalities need external expertise, and therefore working bodies and pooling of funding are proposed, with a small number of initiatives envisaged that one municipality will provide a service to another. The analysis shows that some of the activities envisaged locally overlap with the future competencies of the regional Organizational Unit, suggesting that inter-municipal cooperation may serve as a temporary but functional solution until the regional structure becomes fully operational. However, several collaborations will require a deeper assessment of the capacity of municipalities to determine which of them can take the lead. At the end of this chapter, a table gives the potential IMCs that arise from the analysis of the LAP.

The analysis of the established inter-municipal cooperation in the country in the period 2013–2025 reveals that, despite 96 registered cooperations, the area of environment and communal activities remains underutilized. IMCt cooperation concerns inspection supervision and are established through contracts for the performance of work by one municipality for another. This shows that municipalities prefer models with low institutional risks and limited administrative requirements. Although waste management is legally regulated as a mandatory inter-municipal cooperation, from the analysis of the cooperation carried out, in practice so far, no new voluntary cooperation in this area has been initiated. The reasons may be related to the complexity of the system, the need for significant financial investment, and the expectation that functions will be resolved through regional bodies. However, the trend in inspection services shows that with insufficient capacity, municipalities are actively resorting to collaborative solutions, suggesting that similar models may become applicable in other components of the system.

The overall analysis points to a common finding: although strategic and legal documents set the framework for regional waste management, the successful functioning of the system will largely depend on how municipalities use the flexibility and potential of inter-municipal cooperation in the transition period. The IMC emerges as a necessary and complementary mechanism that allows for timely preparation, coordination, bridging the capacity gap and rational use of resources, while the regional structure is gradually being established. To fully realize the potential of the system, clear priorities, stable political support, harmonization between municipalities and regular communication between regional and local structures are needed. Thus, inter-municipal cooperation not only complements the regional model, but also becomes an essential condition for its durability and functionality.

**Tabular Display of Potential Inter-Municipal Cooperation**

- Inter-municipal cooperation according to the needs arising from the LAP of the municipalities

| **Priority** | **Area of cooperation** | **Form of inter-municipal cooperation** | **Municipalities involved in cooperation** (number of municipalities) | **Time period of implementation of activities under the LAP*** | **Legal basis – Law on Inter-Municipal Cooperation** |
|---|---|---|---|---|---|
| **PRIORITY 1**<br><br>Providing services (waste collection and transportation) to as many users as possible | **1.** Mapping barriers that restrict access to services to customers and determining the number and size of meeting centers | **Joint Working Body**<br>(Ad Hoc)<br><br>Alternative:<br>Pooling of funds | Bitola, Kichevo, Prilep, Debrca, Demir Hisar, Dolneni, Struga, Resen and Vevchani (9) | 12 months | Article 10 |
| | **2.** Conducting an analysis of collection routes, transportation, necessary vehicles and equipment | **Joint Working Body**<br>(Ad Hoc)<br><br>Alternative:<br>Pooling of funds or assignment of tasks to a joint regional PUC | Bitola, Kichevo, Prilep, Novaci, Plasnitsa, Dolneni, Krivogashtani, Krushevo and Vevchani (9) | 9 months | Article 10 |
| | **3.** Develop and deliver educational programs for employees related to organizational processes and data management | **Pooling of financial, material and other assets**<br><br>Alternative:<br>Joint Administrative Body | Bitola, Prilep, Novaci, Debrca, Demir Hisar, Krivogashtani, Krushevo and Mogila (8) | 6 months<br><br>Or in continuity | Article 30 |
| | **4.** Identify funding sources and effective financial planning to provide equipment to deliver improved services | **Joint Task Force**<br>(permanent)<br><br>Alternative:<br>Pooling of funds | Bitola, Kichevo, Ohrid, Prilep, Novaci, Plasnitsa, Debrca, Demir Hisar, Dolneni, Krivogashtani, Krushevo, Mogila, Resen, Struga and Vevcani (15) | 24 months<br><br>IMC in continuity over a long period of time or indefinitely | Article 10 |
| | **5.** Procurement of vehicles, bins/containers and other equipment | **Joint Working Body**<br>(Ad Hoc)<br><br>Alternative:<br>Pooling of funds | Bitola, Prilep, Debrca, Demir Hisar, Dolneni, Krivogashtani, Resen and Vevchani (8) | Bitola, Prilep, Debrca, Demir Hisar, Dolneni, Krivogashtani, Resen and Vevchani (8) | Article 10 |

| | | | | | |
|---|---|---|---|---|---|
| **PRIORITY 2**<br><br>Introduction of a waste selection system and collection of separate waste streams | **6.** Conduct analysis to determine specific waste flows and treatment methods | **Pooling of financial, material and other assets** | Kichevo, Ohrid, Prilep, Novaci, Plasnitsa, Debrca, Demir Hisar, Dolneni, Mogila, Resen and Vevchani (11) | 3 months | Article 30 |
| | **7.** Conducting market analysis of recycling materials, waste selection costs, and identifying and securing waste buyers | **Pooling of financial, material and other assets** | Bitola, Kichevo, Ohrid, Prilep, Novaci, Plasnitsa, Dolneni, Krivogashtani, Mogila, Resen, Struga and Vevchani (12) | 2 months | Article 30 |
| | **8.** Conducting public campaigns to raise public awareness and motivate the population for the benefits of waste selection | **Pooling of financial, material and other assets**<br><br>**A joint working body** that would precede the pooling of funds and coordinate public awareness raising | Bitola, Kichevo, Ohrid, Prilep, Novaci, Plasnitsa, Demir Hisar, Dolneni, Krivogashtani, Krushevo, Mogila, Resen, Struga and Vevchani (14) | 24 months<br><br>IMC in continuity over a long period of time or indefinitely | Article 30<br>Article 10 |
| | **9.** Identification of locations for waste selection and baling facilities | **Joint Working Body**<br><br>(Ad Hoc) | Debrca, Kichevo, Dolneni, Krushevo, Ohrid and Resen (6) | 6 months | Article 10 |
| | **10.** Construction of Waste Collection Islands and Equipment Procurement | **Joint Working Body**<br><br>(Ad Hoc) | Debrca, Kichevo, Dolneni, Krushevo and Resen (5) | 9 months | Article 10 |
| **PRIORITY 3**<br><br>Reducing the amount of organic waste ending up in landfill | **11.** Conducting an analysis of quantities and models of organic waste and the cost-effectiveness and benefits of organic waste selection and treatment | **Pooling of financial, material and other assets** | Bitola, Kichevo, Ohrid, Prilep, Novaci, Plasnica, Debrca, Demir Hisar, Dolneni, Krivogashtani, Mogila, Resen, Struga and Vevchani (14) | 2 months | Article 30 |

| | | | | | |
|---|---|---|---|---|---|
| | **12.** Raising Public Awareness of Organic Waste Selection and Treatment | **Pooling of financial, material and other assets** | Novaci, Dolneni, Krivogashtani, Resen, Struga and Vevcani (6) | 24 months | Article 30 |
| | **13.** Mobilizing support for the introduction of organic waste selection and designing and implementing pilot projects for organic waste selection | **Joint Working Body** (Ad Hoc) | Krivogashtani, Demir Hisar, Ohrid, Dolneni, Vevcani and Resen (6) | 12 months | Article 10 |
| **PRIORITY 4**<br><br>Construction of a landfill according to EU standards | **14.** Establishment of a regional utility company - definition of the holder of the initiative, signing of an inter-municipal cooperation agreement and selection of a management structure | **Joint Public Enterprise**<br><br>**Joint Working Body** in the Preparatory Phase | Bitola, Ohrid, Prilep, Novaci, Debrca, Demir Hisar, Krivogashtani and Vevchani (8) | 1 month | Article 18 |
| | **15.** Develop a study that identifies changes in municipal waste management practices as a result of the RSWM and regional landfill | **Pooling of financial, material and other assets** | Prilep, Demir Hisar and Vevchani (3) | 6 months | Article 30 |
| | **16.** Fulfillment of the necessary conditions and preparation of urban planning documentation for the construction of transshipment stations | **Joint Working Body** (Occasionally)<br><br><u>Alternative</u>:<br>Pooling of funds | Ohrid and Prilep (2) | 10 months | Article 10 |
| **PRIORITY 5**<br><br>Closure and remediation of dump sites (illegal landfills) | **17.** Mapping of municipal dump sites and development of a priority list, as well as estimation of the costs of closure and remediation of dump sites in municipal budgets | **Joint Working Body** (Ad Hoc) | Bitola, Kichevo, Ohrid, Prilep, Debrca, Demir Hisar, Dolneni, Novaci, Krivogashtani, Krushevo, Mogila, Resen, Struga and Vevchani (14) | 12 months | Article 10 |
| | **18.** Closure/remediation of priority dump sites | **Joint Working Body** (Ad Hoc)<br><br>**Pooling of financial, material and other assets** | Novaci, Demir Hisar, Resen, Struga (4) | 9 months | Article 10<br>Article 30 |

| | | | | | |
|---|---|---|---|---|---|
| | **19.** Raising public awareness and motivating for proper waste disposal so that municipalities are clean and tidy | **Pooling of financial, material and other assets**<br><br>**A joint working body** that would precede the pooling of funds and coordinate public awareness raising | Novaci, Debrca, Demir Hisar, Mogila, Resen (5) | Continuously | Article 30<br>Article 10 |
| **PRIORITY 6**<br><br>Providing revenue that fully covers waste management costs | **20.** Determining the Income and Expenditure Gap of Waste Management Activities | **Pooling of financial, material and other assets** | Bitola, Kichevo, Prilep, Novaci, Plasnitsa, Debrca, Demir Hisar, Dolneni, Krivogashtani, Krushevo, Mogila, Resen, Struga, Vevchani and Ohrid (15) | 12 months | Article 30 |
| | **21.** Determination of the Waste Fee Collection Rate | **Pooling of financial, material and other assets** | Novaci, Debrca, Dolneni, Krivogaštani and Mogila (5) | 1 month | Article 30 |
| | **22.** Increase the rate of collection of waste fees and provide additional revenue from waste trading | **Performance of certain works by one municipality for one or more other municipalities** | Prilep & Novaci (2) | 24 months | Article 29 |
| Monitoring, coordination, and reporting | **23.** Monitoring, coordinating and reporting on inter-municipal cooperation | **Joint Commission** (Coordinating Body) | Bitola, Kichevo, Prilep, Novaci, Plasnitsa, Debrca, Demir Hisar, Dolneni, Krivogashtani, Krushevo, Mogila, Resen, Struga, Vevchani and Ohrid (15) | Continuously | Member of the 10th and Member 38 |

* In the context of inter-municipal cooperation, the envisaged periods of implementation of activities arising from the LAP should be revised

- Inter-Communal Cooperation in Accordance with the Needs arising from Other Relevant Documents

| Area of cooperation | Form of inter-municipal cooperation | Municipalities involved in cooperation<br><br>(number of municipalities) | IMC implementation timeline | Legal basis – Law on Inter-Municipal Cooperation |
|---|---|---|---|---|
| **24.** Harmonization and implementation of regulations | **Joint Committee** | All municipalities of the Pelagonia and South-West region (18) | Continuously | Article 10 |
| **25.** Inspection Supervision | **Joint Administrative Body** | All municipalities of the Pelagonia and South-West region (18) | Continuously | Article 11 – Article 17 |
| **26.** Data management, reporting and monitoring | **Joint Administrative Body** | All municipalities of the Pelagonia and South-West region (18) | Continuously | Article 11 – Article 17 |

# 2. RECOMMENDATIONS

This chapter presents a sublimated overview of recommendations on the benefits and applicability of inter-municipal cooperation in regional waste management. The recommendations were created on the basis of a detailed analysis of relevant legislative and strategic documents, including the Waste Management Law, the draft National Waste Management Strategy 2024–2036, the Waste Management Plan of the Republic of North Macedonia 2021–2031, the Operational Regional Waste Management Plan of the Pelagonia and Southwest regions, the local action plans of the 15 municipalities, as well as the analysis of established cooperation in the field of environment and utilities in the period 2013–2025.

The recommendations in this chapter are aimed at strengthening inter-municipal cooperation as an alternative approach and mechanism for providing quality, sustainable and effective waste management services. In doing so, the recommendations underline the practical value of inter-municipal cooperation as a tool that complements and supports the established regional waste management framework, ensuring synergies between municipalities, improving the economic sustainability, efficiency and transparency of the system, as well as the fulfilment of legal and regulatory obligations.

**Recommendation 1:** Municipalities, in fulfilling the legal obligation to apply the **principle of universality of services, the principle of proximity, the "polluter pays" principle and the hierarchy in waste management**, should consider the possibilities of using inter-municipal cooperation as a mechanism that can contribute to a more effective application of these principles, through a regional approach that provides quality services and a sustainable waste management system.

**Recommendation 2:** Municipalities should use **inter-municipal cooperation as an instrument to preserve functional autonomy**, even in the context of legally established mandatory regional waste management, and thus avoid timely the adoption of a government decision that would assume their competences in the establishment of the regional system.

**Recommendation 3:** The Inter-Municipal Board and the Waste Management Organizational Unit are the key institutional forms of cooperation between the municipalities of the region for the implementation of regional waste management. In doing so, **it is crucial to establish an organizational structure of the organizational unit based on clearly defined competencies and capacities that will not overlap with potential inter-municipal cooperation and structures** formed by municipalities under the Law on Intermunicipal Cooperation.

Inter-municipal cooperation should be treated as an additional mechanism to complement and support the established regional waste management system, and not as to create parallel structures and overlaps in the implementation of competencies.

**Recommendation 4:** The political capacity and democratic legitimacy enjoyed by the Intermunicipal Board, as an institutional form of inter-municipal cooperation composed of the mayors of the municipalities of the region, should be used in synergy with the ZELS to **advocate and lobby towards improving the legal and financial framework for regional waste management**.

**Recommendation 5:** **Members of municipal councils should be promptly informed, educated and actively involved** in the establishment and management of inter-municipal cooperation within the regional waste management system. As holders of democratic legitimacy

and institutional control, they decide on joining cooperation, forming joint ventures, regional partnerships or concessions, as well as possibly transferring competencies. essential to the legal basis, transparency and effective implementation of joint activities.

**Recommendation 6:** The regional plan is a key instrument for institutionalised cooperation between municipalities, through which common objectives, priorities and waste management measures are harmonized at regional level. In addition, **the planning process should be a joint process that requires inter-municipal coordination** and collective decision-making on infrastructure, investments and priorities in waste management at regional level, as well as its monitoring and reporting, and all coordinated by the Organizational Unit.

**Recommendation 7:** Decisions to **implement inter-municipal initiatives should be based on coordinated analyses, assessments and proposals**, as well as the preparation of all necessary preparatory documents – feasibility studies, environmental impact assessment and economic feasibility study, which will cover all participating municipalities which creates an additional layer of institutional complexity.

**Recommendation 8:** Municipalities **in the initial stage should establish inter-municipal cooperation in areas with lower organisational and financial risk**, through forms that do not require significant institutional changes, such as joint working bodies and commissions, pooling of financial and other material resources, or delivery of services from one municipality to others. Joint administrative bodies and strategic and capital-intensive segments of cooperation in waste management.

**Recommendation 9:** Municipalities should use inter-municipal cooperation to **coordinate informing citizens** about established public waste management services, through joint more comprehensive and far-reaching campaigns, unified information materials, regional public debates and common communication platforms. In this way, information is carried out more efficiently and rationally, and citizens receive consistent messages about the service, its standard, obligations and the rights that arise of her. This ensures higher visibility, greater credibility and more efficient involvement of citizens in the new regional waste management system.

**Recommendation 10:** Municipalities establishing a common regional landfill (and public utility company) for non-hazardous and inert waste should ensure a **clear division of responsibilities and responsibilities**, **basing inter-municipal cooperation on the principles of solidarity, financial transparency, democratic governance and operational efficiency**. In this way, the functional management of the joint venture is ensured and the effective implementation of all legal obligations related to the construction, management, monitoring and control of the landfill, as well as the obligations after the termination of the operation of the landfill.

**Recommendation 11:** Municipalities need to establish **a coordinated inter-municipal regional system for collecting, processing and sharing data,** in order to overcome existing weaknesses related to incomplete, inconsistent or differently collected waste management data. Harmonized methodologies, common tools and regular collaboration will allow for better planning, monitoring and reporting, as well as a basis for joint decision-making and the development of policies based on the data and more effective implementation of regional and national obligations.

In addition, inter-municipal cooperation should encourage the development of common **digital tools and platforms** for data management, which will allow for greater automation and faster access to information, contributing to the **digital transformation** of the waste management system.

**Recommendation 12:** The value and necessity of establishing an **IMC should be recognised and encouraged within the framework of national strategic and planning documents** on waste management as an additional option available to municipalities in support of an integrated regional approach.

**Recommendation 13:** Municipalities should take advantage of the opportunities of inter-municipal cooperation to **jointly finance the infrastructure and operational needs** of the regional waste management system. Joint venture allows for a more efficient distribution of financial responsibility, better coordination and planning, as well as increased economic sustainability and efficiency of the system.

The guidelines of the draft Waste Management Strategy 2024 – 2036 that "**the Government may allocate funds to encourage inter-municipal cooperation, including activities related to waste management**" should form the basis for institutional support efforts and to provide an incentive for local governments to enter into inter-municipal arrangements in the field of waste management. It is necessary to ensure the support of the Ministry of Local Self-Government in providing the preconditions for providing government financial support for the establishment of the IMC in waste management.

**Recommendation 14:** Municipalities should harness the potential of inter-municipal cooperation to ensure financial sustainability in the implementation of waste management plans. Through **joint participation and coordinated use of available financial mechanisms** – such as EU-IPA instruments, bilateral grants and other sources – municipalities can significantly increase opportunities for infrastructure financing and develop a more efficient and sustainable regional waste management system.

**Recommendation 15:** Municipalities should be recognized and positioned as **key actors in the development of the legal framework and compliance with *the acquis communautaire*** in waste management. In doing so, inter-municipal cooperation should be used as a mechanism to strengthen their role, especially through action in the Inter-Municipal Board and in cooperation with the ZELS. In doing so, municipalities can ensure a unified and coherent attitude towards the central institutions, facilitating the process of creating, amending and supplementing legal regulations, which constitutes an essential basis for meeting future European requirements and effectively aligning with European legislation.

**Recommendation 16:** Inter-municipal cooperation should be used to establish and manage common collection centers and **improved services within the framework of extended producer responsibility systems**, whereby municipalities achieve lower costs, greater territorial coverage and harmonized standards of infrastructure, organization and records, ensuring more efficient and transparent fulfillment of targets for specific waste streams in the region.

**Recommendation 17:** To overcome the pronounced deficiencies in human resources, expertise and operational capacity in local inspection supervision, it is recommended **to establish inter-municipal cooperation for joint inspection services through the formation of a common administrative body**. This model will allow for more efficient use of existing

resources, coordinated field inspections, harmonized sanctioning, systematic supervision of illegal activities and better compliance with legal obligations. In this way, municipalities will provide a more sustainable and professionally enhanced inspection system, capable of responding to the growing regulatory and operational requirements in waste management.

**Recommendation 18:** The potential of inter-municipal cooperation should be used for **the continuous building and development of human resource capacities**, through joint trainings and educational programs for employees of municipal administrations and public enterprises. This can be realized through the hiring of external experts, funded jointly by the municipalities, or through the establishment of a joint administrative body for human resource management that will enable sustainability and sustainability. Systematic development of personnel in the long term.

**Recommendation 19:** Within the inter-municipal context, issues **related to the informal sector** in the regional waste management system as a social category should be addressed, taking **inclusive measures that provide benefits to vulnerable groups, with a special focus on women**. This approach allows for the integration of social aspects into waste planning and management, promoting equality and social inclusion.

# 1. ANALYSIS OF THE LAW ON WASTE MANAGEMENT FROM THE PERSPECTIVE OF INTER-MUNICIPAL COOPERATION

The analysis of the Law on Waste Management has been prepared in order to determine the legal bases, opportunities and needs for the establishment and promotion of inter-municipal cooperation in the field of waste management. Its aim is to identify the legal mechanisms through which municipalities can jointly exercise their competences, with a particular emphasis on regional waste management as a form of mandatory inter-municipal cooperation.

The analysis examines the relevant provisions of the Law on Waste Management in relation to inter-municipal cooperation, but also makes a connection with the Law on Inter-Municipal Cooperation, paying attention to the issue of the functional autonomy of local self-government and its practical implementation in the context of mandatory inter-municipal cooperation.

The content in the further course covers the basic principles and hierarchy in waste management, formal and informal forms of inter-municipal cooperation, organizational structures for regional management, as well as issues related to financing, inspection supervision and public service implementation.

The findings of the analysis will also serve as a basis for the creation of recommendations for the application of inter-municipal cooperation in the local action plans for waste management of the municipalities of the Pelagonia and South-West regions. This will provide support to local self-governments in promoting institutional coordination, the use of common resources and the implementation of unified policies in the interest of efficient and sustainable waste management through inter-municipal cooperation.

## 1.1. LEGAL BASIS FOR COOPERATION BETWEEN LOCAL AUTHORITIES

The right of association of municipalities in the exercise of their competences is defined in Article 10 of **the European Charter of Local Self-Government**[i], which states that "local authorities have the right, in the exercise of their competences, to cooperate and, within the framework of the law, to form consortia with other local authorities for the performance of tasks of common interest". In particular, in order to achieve greater efficiency through joint projects or the execution of tasks in cases where an individual municipality does not have sufficient resources or capacities. On the other hand, this right is implemented in domestic legislation through the Law **on Inter-Municipal Cooperation** [ii] (Articles 3 and 4) and **the Law on Local Self-Government** [iii] (Articles 14 and 61). The Law on Inter-Municipal Cooperation regulates the manner, conditions and procedure for the establishment of cooperation and the forms through which it is carried out, the financing, recording and supervision of inter-municipal cooperation. The law distinguishes two main groups of **formal forms** for the realization of inter-municipal cooperation. The first group is the so-called **institutional forms** through the formation of bodies for inter-municipal cooperation such as a joint working body and commission and a joint administrative body. Institutional forms include the establishment of joint public services, such as a joint public enterprise and a joint public institution. The second group **includesContractual forms of** cooperation that can be achieved through the conclusion of agreements for the pooling of financial, material and other resources and contracts for the performance of certain works by one municipality for one or more other municipalities.

In addition to legal forms, inter-municipal cooperation can also be **informal**. Informal forms are very important in practice, as they often represent a preliminary step towards the creation of formal

institutional or contractual cooperation. They are usually based on relations between municipal administrations and aim to create a form of partnership to solve practical problems. And IMCt of the time, they don't require large amounts of public funding. The further text of the analysis includes informal cooperation as one of the possible forms.

The Law on Intermunicipal Cooperation in Article 3 emphasizes **the voluntary nature** of cooperation, whereby municipalities independently and voluntarily decide to establish inter-municipal cooperation, while respecting **the functional autonomy** of local self-government. However, it is evident that the commitment within the framework of other laws to encourage and establish intermunicipal cooperation as a mandatory solution for the implementation of local competences. **Mandatory inter-municipal cooperation** is justified by the specificity and nature of the implementation of a specific competence, which implies a regional approach and economies of scale in order to achieve the objective more efficiently and economically. This solution represents a partial limitation of local autonomy, but is justified by the aspect of the public interest and the need to ensure a functional and harmonized national system in a particular area. More specifically in the area of waste management, the state retains a subsidiary role and intervenes only when local authorities fail to fulfil their part of the legal obligation, in order to ensure the efficiency and full implementation of waste management policy at regional level, within the framework of national strategic and planning documents.

In addition to waste management, mandatory inter-municipal cooperation is also established for the implementation of fire protection, uniform local and regional development, and regional planning of social protection.

## 1.2. BASIC PRINCIPLES AND HIERARCHY IN WASTE MANAGEMENT THROUGH THE PRISM OF INTER-MUNICIPAL COOPERATION

The analysis of the Law on Waste Management through the prism of inter-municipal cooperation logically begins with the consideration of its principles, since they define the essence and direction of policies and practices in the field of waste management, as well as the relationship between different levels of government. The principles also set out a normative framework that justifies and encourages inter-municipal cooperation as a means of achieving efficient, sustainable and universal waste management.

Articles 10 and 11 of the Law are of particular importance for understanding the obligation and need for a regional and community approach to waste management. Article 10, which sets out **the principle of universality of services**, imposes an obligation for all citizens to have equal access to waste management services, regardless of their location, including isolated settlements. especially in the areas of infrastructure, technical equipment and financial sustainability. Therefore, inter-municipal cooperation presents an opportunity to provide universal, accessible and quality service through the sharing of resources and infrastructure. On the other hand, Article 11, which regulates **the principle of proximity**, further reinforces the need for a regional approach to waste management, prescribing that waste should be collected and processed as close as possible to the place of its generation, i.e. within the region. In doing so, the Law establishes the territorial and functional basis for the establishment of regional systems and the implementation of joint strategic and planning documents by multiple municipalities. obliges municipalities to manage measures and activities relating to waste management in accordance with the principles and provisions of the law, as well as in accordance with the principles set out in the Environmental Law.

In addition, **the waste management hierarchy** set out in Article 14 can only be effectively implemented within a regional system, where multiple municipalities distribute responsibilities in a coordinated

manner, taking into account resource protection, technical feasibility and economic sustainability, as well as the impact on human health.

On the whole, these articles set out the concept of regional and coordinated waste management as the basic mechanism for fulfilling the legal principles of universality, proximity and joint action. Thus, inter-municipal cooperation emerges as a potential instrument for the practical implementation of legal obligations.

## 1.3. FORMS OF INTER-MUNICIPAL COOPERATION IN REGIONAL WASTE MANAGEMENT

Article 28 - Obligations of the Municipalities and the City of Skopje for the Management of Municipal and Other Non-Hazardous Waste, defines the **material scope of the competences and obligations** of the municipalities in waste management. This article lays the ground, i.e. defines the position of the municipality as the bearer of the local waste management policy through the duties of the mayor. Must do — from taking care of municipal waste, maintaining public cleanliness and clearing of abandoned waste, ensuring the selection, and implementation of special flows within the expanded responsibility of the producer, as well as proposing and enacting acts for waste management and implementing measures thereof.

Also, this article **obliges the mayors of municipalities and the City of Skopje to cooperate with each other** for the establishment and functioning of the regional waste management system, in accordance with the national and regional plan.

### 1.3.1. AGREEMENT

For the establishment of the system, the councils of municipalities and the Council of the City of Skopje of the respective waste management region are obliged to make **a decision on concluding an association agreement for the establishment of a waste management system at regional level**, in accordance with the Waste Management Plan of the Republic of North Macedonia (Article 31 - Waste management at regional level). This is a mandatory form of inter-municipal cooperation prescribed by the state, but implemented through local acts (council decisions). Thus, the state sets the framework (the Plan and territorial affiliation in the regions), and the implementation is entrusted to the local self-government units through the decision to conclude an agreement of their councils.

The agreement regulates the mutual rights and obligations of the municipalities and the city of Skopje in association for the establishment and provision of conditions for the functioning of the regional system, as well as other issues of common interest for the organization and implementation of waste management at regional level. This form, although more commonly referred to as an "agreement", is by its legal nature a **contractual instrument** of cooperation between municipalities, similar to the contractual cooperation provided for in the MoE Act.

The fifth paragraph of the same article introduces an exception to territorial affiliation with the region established by the Plan. In other words, it recognises a certain degree of local autonomy: the Council of the Municipality and the Council of the City of Skopje may decide to merge into another waste management region other than the region specified in the Plan, but only if such a decision does not impede the establishment or functioning of the system in its envisaged region and only after the prior consent of the Minister. From the point of view of the autonomy of local self-government, this provision shows that municipalities do not have complete freedom in determining partners for inter-municipal

cooperation, since the state defines the basic territorial framework and the conditions for deviation from it.

If the municipalities and/or the City of Skopje belonging to a particular waste management region fail to fulfil their legal obligation to merge, i.e. to conclude an agreement for the establishment of a regional system within the period specified in the Plan, or fail to establish the system within two years from the date of adoption of the agreement, pursuant to paragraph 7 of Article 31, The government, on the proposal of the Minister, takes over the responsibility for establishing a waste management system for the region. With this decision, the Government defines the entire structure of the regional system — determines the region and municipalities and/or the City of Skopje that will be covered, determines the manner of establishment and financing of the system, the mode and duration of management, organizational setup and all other issues relevant to its functioning (paragraph 8). In doing so, the state effectively replaces the function of local initiative.

From the point of view of the principles of inter-municipal cooperation, such a solution constitutes **a limitation of its voluntary character** and transforms it into **a mandatory form of association**, but is based on the principle of public interest and the functionality of the national system. This means that the state intervenes only as a last resort, when local authorities fail to organize themselves independently **in the legally established form of cooperation and time limit** And thus the lack of inter-communal coordination and agreement would jeopardize the establishment of an integrated regional system.

### 1.3.2. INTER-MUNICIPAL WASTE MANAGEMENT BOARD

Article 31 also introduces two interrelated but conceptually different terms "**regional system**" and "**regional governance**". In addition, "**regional system**" refers to the material and technical infrastructure that makes up the central waste management facility (regional landfill), transshipment stations and other installations necessary for the receiving, processing and disposal of waste. It is the physical, operational mechanism through which waste management activities are carried out. On the other hand, "**regional governance**" refers to the institutional and organisational dimension – i.e. the way in which municipalities and the city of Skopje jointly coordinate, organise and manage the processes related to the functioning of the regional system.

For the implementation of the regional management and the regional plan, as well as the implementation of the agreement, an **inter-municipal waste management board shall be established for each waste management region (**Article 32 - Intermunicipal Waste Management Board). The board shall be composed of the mayors of the municipalities and the city of Skopje from the respective waste management region (or other persons authorized by the mayors) and shall function as a Through the Board, municipalities exercise their common responsibility for establishing and managing the regional system.

The Inter-Municipal Waste Management Board in the Pelagonia and Southwest Regions was formed on December 10, 2025.

### 1.3.3. REGIONAL WASTE MANAGEMENT ORGANIZATIONAL UNIT

To provide professional, administrative and technical support, project coordination, monitoring and implementation of the Board's decisions, an **Organizational Unit for Regional Waste Management is**

**established** (Article 34-Modus operandi of the Board). As an instrument for the implementation of the regional approach to waste management, the Organizational Unit is established **within the Planning Region Development Center**, but This means that the organizational unit does not have the status of an independent legal entity, but is part of the organizational structure of the Center for Development of the Planning Region and is **the result of a previous inter-municipal agreement** – **an instrument arising from the will of the municipalities to merge** to establish a waste management system at the regional level.

If a parallel is drawn with the Law on Inter-Municipal Cooperation, an organizational unit can be treated as **a specific institutional form of joint service** and can be compared to **a joint administrative body** as one of the legally prescribed forms of cooperation. It is an example of functional integration of administrative capacities, formed to implement the regional waste management system, without creating a new public institution. The competences of the organisational unit are defined in Article 36 – Competences of the organisational unit for regional waste management, of the LWM.

## 1.4. IMPLEMENTATION OF INTER-MUNICIPAL COOPERATION IN REGIONAL WASTE MANAGEMENT

### 1.4.1. REGIONAL WASTE MANAGEMENT PLAN

Inter-municipal waste management boards, municipalities and the city of Skopje are obliged **to adopt strategic, planning and program documents for waste management**, in order to ensure a coordinated and sustainable system at regional level (Article 21 - Planning in waste management). , which directly links this provision to the need for coordination, cooperation between municipalities and **integrated regional planning**.

On the other hand, Article 30 - Implementation of strategic and planning documents for waste management, represents the next logical stage after planning and establishes the obligation for **the implementation and practical application of the adopted strategic and planning documents**. This article specifies that all institutions and entities involved in the waste management system – public administration bodies, Local self-government units, public institutions, enterprises and organizations have the duty **to monitor, implement and take care of the achievement of the measures** and **objectives** arising from these documents.

Taking into account the foregoing, of particular importance is the Regional Waste Management Plan, which **is** adopted by the **councils of municipalities and the Skopje City Council** on the proposal of the Intermunicipal Board (Article 24 - Regional Waste Management Plans). The Regional Plan is a key instrument for institutionalized cooperation between municipalities, through which common goals, priorities and measures are harmonized Waste management at the regional level. In this sense, planning is not an individual municipal activity, but rather a process that requires inter-municipal contracting and joint decision-making on infrastructure, investments, and waste management priorities.

The cooperation set out in this article shall be based on **mutual agreement** and **coordination** which results in the adoption of the plan through **concerted decisions of the councils of all municipalities to adopt a regional plan as a document with the same content**, which presupposes mutual trust, alignment of priorities and shared responsibility in the implementation. Furthermore, Article 24 also provides for notification by the Inter-Municipal Board of Waste management every three years for the

implementation of the plan, which is a **mechanism for joint monitoring, evaluation and adjustment of policies**.

The elaboration, implementation and monitoring of the regional plan implies **institutional cooperation between the authorities and administrations of local self-governments**, based on joint decision-making and shared responsibility, which allows for a more efficient use of resources and the establishment of functional regional waste management systems. Of course, this process should be **coordinated by the Organizational Unit** In accordance with its statutory competence under Article 36, paragraph 1 - prepares the regional waste management plan, including the annual targets to be achieved by waste management at the regional level.

Cooperation in waste management is key to translating national policies into local actions. In this sense, a positive example of such cooperation is the elaboration of the Operational Plan for Waste Management for the Pelagonia and South-West regions, [4] the elaboration of which is based on **informal inter-municipal cooperation** and participatory approach. At the constituent session of the Board, it was concluded (voted) that the Regional Plan will be developed through coordinated process and joint agreement on priorities, objectives and measures between municipalities, with technical and expert support from SALAR International. From there, with donor support, the plan development process included a review of national legislation and policies, as well as a series of workshops in both regions in late 2022 and early 2023. The workshops were attended by more than 45 representatives of municipal administration, utility companies and national institutions and associations, thus ensuring common ownership of the process and the final document. From the point of view of the Law on Inter-Municipal Cooperation, this cooperation does not require the formal establishment of a contractual or institutional form of cooperation and decisions of the councils of the municipalities.

### 1.4.2. INTEGRATED WASTE MANAGEMENT NETWORK

Article 45 - Integrated Waste Management Network establishes a framework for the creation **of an integrated municipal waste management network**, which should allow for **the safest and IMCt economical collection, selection, processing and disposal of waste**.

The law provides that the network may be **organized at the level of one or more waste** management regions, but also allows its functioning **at the level of one or more municipalities** or the City of Skopje.

The network is organized according to the waste management hierarchy and unites installations intended for waste disposal that can be connected to transshipment stations, as well as other infrastructure for collection, selection and processing of waste, in order to ensure a high level of environmental protection as well as public health. Additionally, an integrated waste management network that is organized at the level of one or more regions may include installation for the removal of construction shots.

The functioning of the integrated network is ensured through the following functional units: Primary waste collection system; Transshipment stations; Secondary transport systems; and landfills.

In the primary system of waste collection in populated areas by service users from which waste is collected according to a fixed schedule and frequency according to the law, waste is transported by means of transport directly to the transshipment station or to processing installations or for other types of waste handling. At transshipment stations, waste collected by primary collection vehicles is transferred to specialised vehicles with higher capacity in order to ensure economical transport to waste handling facilities.

[4] Operational Regional Waste Management Plan for Pelagonia and Southwest Region; https://url-shortener.me/948K

The manner and conditions of operation of the integrated waste disposal network are prescribed by the Regulations on the manner and conditions of operation of the integrated waste disposal network[iv].

With the provisions of Article 45 of the Lae on Waste Management once again confirms the possibility of inter-municipal cooperation in waste management through the establishment of an integrated network that can be organised at the level of one or more municipalities or regions. In doing so, the law encourages inter-municipal cooperation as a tool to achieve efficient, cost-effective and environmentally sustainable waste management, adapted to local needs and capacities.

### 1.4.3. WAYS OF DELIVERING PUBLIC SERVICE BY MUNICIPALITIES AND THE CITY OF SKOPJE

First of all, it is important to point out that waste management in the area of one or more municipalities is **a public service of local importance** provided by service providers.

Article 60 - Manner of Public Service Delivery by Municipalities and the City of Skopje of the Law on Waste Management regulates the ways and forms through which municipalities and the City of Skopje may **organize the public service for collection, transportation and selection of municipal waste**. Each municipality has an obligation to provide an integrated approach, with the possibility to implement it independently or through inter-municipal cooperation.

Paragraph (3) explicitly states that "**two or more municipalities, as well as municipalities and the City of Skopje, may establish a joint public enterprise** to carry out the activities referred to in paragraph (2)" — i.e. for the collection and transportation of municipal waste. cooperate through the "establishment of a joint public service – a joint public enterprise or a joint public institution". The Law on Intermunicipal Cooperation, through Articles 18–23, regulates the procedure, organization and management of joint public enterprises. However, the procedure begins after a proposal or initiative has been submitted on the basis of a preliminary assessment of the need to establish inter-municipal cooperation. On the basis of the assessment, the council of the municipality decides on entering into cooperation with other municipalities (Article 6 of the LIMC).

The initiative of the Municipality of Novaci to establish an IMC for the formation of a joint public enterprise, was accepted by 17 municipalities from the Pelagonia and Southwest regions (except the municipality of Debar) during 2025.

Furthermore, **paragraph (4)** of Article 60 of the Law on Waste Managementadds an additional possibility for **a contractual form of cooperation**, through which one or more municipalities may **entrust the public service to legal entities,** in accordance with the Law on Concessions and Public Private Partnership. This form allows for **contractual inter-municipal cooperation**, which, in comparison with the Law on Intermunicipal Cooperation, one municipality may perform the service at the expense of another, or municipalities may also pool financial, material and other means for the implementation of joint projects in the exercise of their competences.

Inter-municipal cooperation, on the one hand, creates opportunities to streamline the process through the sharing of resources, expertise and financial resources, but on the other hand, it sets additional requirements in terms of institutional coordination and distribution of responsibilities.

Only as an illustration, in addition to the preparation of an assessment of the need to establish an ISA under the ISA, in the context of the application of Article 16 of **the Law on Concessions and Public-Private Partnerships**, which governs the preparatory work for the granting of a concession or for the conclusion of a public-private partnership agreement, inter-municipal cooperation has a significant impact on the manner in which these obligations are fulfilled, Especially when it comes to regional

waste management. With the establishment of inter-municipal cooperation, municipalities act as a joint grantor or public partner, which extends the obligation to carry out in a coordinated manner all preparatory activities established by law – preparation of a report for preliminary analysis, preparation of a feasibility study and implementation of an environmental impact assessment. These documents must cover the regional dimension of the project and provide a coherent approach to identifying the needs, objectives and economic feasibility of the proposed partnership.

In addition, according to Article 17, when the grantor or public partner is a municipality, the City of Skopje or a municipality within the City of Skopje, the decision is made by the council of the relevant unit of local self-government, based on a proposal from the mayor. In the context **of inter-municipal cooperation**, this legislative formulation creates an additional layer of institutional complexity, since each municipality participating in the joint project must individually carry out the procedure for the implementation of the Making such a decision within the framework of its Council. This means that the establishment of a regional public-private partnership or concession requires the consent not only of the executive bodies (mayors), but also of the councils of all participating municipalities.

In the event that a public service is implemented through a joint public enterprise or entrusted to legal entities, **monitoring the operation of the service provider and ensuring the quality of the service delivered remains the responsibility of all partners involved**.

However, the provisions of Article 60 of the Law on Waste Management allow for the rationalization of resources and the provision of a higher quality of public service through joint administrative and technical capacities. The aim is to achieve **economies of scale**, which means that smaller municipalities that would not be able to finance all segments of the integrated system on their own, **through association and inter-municipal cooperation, obtain a functional, technically and financially viable model**.

### 1.4.4. ENSURING THE APPLICATION OF THE PRINCIPLE OF UNIVERSALITY OF SERVICE AT THE LOCAL LEVEL

Article 61 - Ensuring the application of the principle of universality of service at the local level refers to the **application of the principle of universality of service**, which means that all citizens, regardless of their place of residence within a municipality, should have access to the public waste management service. This principle underlines the obligation of municipalities to ensure accessibility, continuity and equal quality of service for all users.

Also, this article establishes the normative mechanism through which **each municipality independently** regulates the **method of collection and transportation of municipal waste in the municipality's area**, within its competence. **At the suggestion of the mayor, the council adopts an act** that prescribes in detail the conditions, manner and schemes for the collection and transportation of municipal waste within the integrated waste management system, including in isolated settlements. The act necessarily determines the territory in which universal service is provided, as well as the manner and frequency of waste collection in each settlement in the municipality. The act also prescribes incentive measures to encourage waste selection, as well as technical and organisational requirements related to the equipment and operation of collection points and centres, including rules for the handling of special waste streams.

In addition, the mayor has an obligation to ensure **transparency and information to the public** regarding the acts passed relating to ensuring the universality of the service. The obligation does not end with the formal publication of decisions in the official gazettes, but also implies **active communication with users.**

Although formally each mayor is responsible for informing residents in their municipality, collaboration can improve the efficiency and reach of communication. Within the framework of inter-municipal cooperation, mayors may coordinate joint campaigns, produce uniform information materials, organise regional public hearings, press releases or use common communication platforms (e.g. website of a joint public enterprise). In this way, information is carried out in a more rational way, and citizens receive consistent messages about the service, its standard, its obligations and the rights arising from it.

Thus, the IMC does not transfer legal responsibility, but strengthens its implementation through joint planning, coordination and performance, which in particular contributes to quality service with a regional character and better public visibility.

In the context of regional waste management and inter-municipal cooperation, this article makes it clear that despite the existence of a regional system, each municipality retains a key competence to prescribe the local operational aspects of the service. In other words, the members of the system are connected at the regional level for efficiency and economies of scale, but each municipality individually and formally sets rules, obligations, and standards for the performance of services within its boundaries.

This means that inter-municipal cooperation and the regional system do not invalidate local autonomy, each Council carries its own act to ensure the application of the principle of universality of service at the local level, but in the context of common regional objectives and standards.

### 1.4.5. COLLECTION AND SELECTION OF MUNICIPAL WASTE

In Article 62 – Collection and selection of municipal waste, service providers, in cooperation with handlers of special waste streams, are obliged **to set up collection and waste selection containers**[5] at collection points designated by the mayor to allow for the selection of waste prior to its collection, and in particular the separate collection of hazardous waste generated by households. In addition, Service providers are also required to set up **gathering centres**[6] with at least one gathering centre per 15,000 residents.

If the service provider is a joint public undertaking (Art. 60, paragraph (3)) or a legal person entrusted with the service for several municipalities (Art. 60, paragraph (4), and in accordance with the Concession Law and the PPP), then, within the framework of inter-municipal cooperation, the "joint" service provider must coordinate the implementation of these obligations on the territory of each municipality individually. This implies that meeting places, which are under the jurisdiction of the mayor, will be variously planned and set up depending on local conditions, but will have to be covered in a single service provider operating plan. The same applies to the establishment of gathering centres, where the law mandates at least one centre per 15,000 inhabitants. In addition, the service provider is obliged to collect and transport **hazardous waste from households** from the collection point or collection centre and hand it over to the regional centre operator (Article 55 – Management of hazardous

[5] "Collection place" (Art. 6, paragraph (1)(31)) means a place where one or more containers are located for the purpose of carrying out waste management activities or transporting it to a collection centre) to set up waste collection and selection containers to enable the selection of waste prior to its collection, and especially separate collection of hazardous waste generated by households.

[6] "Collection centre" (Art. 6, paragraph (1)(32)) means a facility or part of a facility where municipal waste is left free of charge by households, including waste intended for recycling which is collected and stored temporarily, which, due to the large volume or hazardous characteristics possessed by the waste, must not be disposed of in bins or waste containers placed at collection sites)

waste from households). This creates a need for joint modelling of the network of collection centres, especially in smaller or rural municipalities, where cost-effectiveness may depend on a regional or inter-municipal solution.

Thus, although each mayor retains formal competence to determine specific locations (meeting places and meeting centers), the joint public enterprise bears responsibility for integrated planning, technical equipment and organization of services. It requires the harmonization of local acts (prescribed by councils under Article 61) to ensure a uniform standard and efficient performance of service throughout the area. In fact, this represents a practical application of inter-municipal cooperation: each municipality retains autonomy in the adoption of regulations, but their implementation is unified under a common provider, which allows for better economies of scale, quality standardization and targeted management of infrastructure and waste flows.

### 1.4.6. WASTE MANAGEMENT PERMIT

Service providers must hold a waste management permit issued in accordance with section 64 of the Law on Waste Management. In this article, service providers are referred to as waste management entities.

The waste management permit of service providers (especially the joint public utility company) has a direct impact on all partners within the framework of inter-municipal cooperation. It is a formal prerequisite for the provision of the public service. In some way, all founding municipalities jointly (collectively) guarantee that the enterprise meets the legal requirements for obtaining and maintaining the permit, which includes meeting technical, organizational, personnel and environmental standards. Municipalities are directly financially responsible for the creation, equipping and maintenance of the enterprise, for its liquidity, for capital investments, and for eventual losses. The Joint Public Utility Company, i.e. indirectly the partner municipalities, should provide both the financial guarantee (i.e. insurance providing compensation for environmental damage from the performance of the activity) as well as the guarantee providing care after the closure or cessation of the activity.

This issue is discussed in more detail in Chapter VIII. PERMITS FOR CARRYING OUT WASTE MANAGEMENT ACTIVITIES, from Article 64 to Article 68 of the Waste Management Law.

### 1.4.7. ESTABLISHMENT OF A JOINT PUBLIC UTILITY COMPANY IN ACCORDANCE WITH THE LAW ON INTERMUNICIPAL COOPERATION

In addition to the provisions of the Law on Waste Management, the Law on Intermunicipal Cooperation in Chapter 4. Joint Public Enterprise, with Articles 18 to 23, defines the content of the decision of establishment, which is a basic legal act by which the partner municipalities determine the foundations of the joint management of the public service. Starting from its core activity, through internal organization, to its relations with external subjects.

The decision shall specify the name and registered office of the company, as well as the amount of funds required for its establishment, including the manner of their provision. At the same time, it regulates the organizational setting of the enterprise, i.e. the structure and mode of functioning of its bodies. The municipalities agree on the manner in which the decisions of these bodies are to be implemented, which ensures joint control and coordination in their work.

The decision also determines the liability of the company for its obligations to third parties in the legal turnover, establishing the legal status of the company as an independent entity within the scope of its activities. A deadline is prescribed for the adoption of the statute and for the naming of the bodies as the basic acts and bodies that will regulate and carry out the day-to-day operations.

Particular attention is paid to the organization of management: the number, composition and manner of election of members of the management board are defined, as well as the criteria and procedure for the election of the director. It also determines the composition and manner of selection of the supervisory board, as a body in charge of monitoring the legality and business correctness of operations.

Until the final constitution of the enterprise, a person is appointed to carry out the preparation and coordination of the necessary activities. This transitional element ensures continuity and timely commencement of work.

## 1.5. LANDFILLS

### 1.5.1. REGIONAL LANDFILLS FOR NON-HAZARDOUS WASTE

According to the provisions of the Waste Management Act, a non-hazardous waste landfill can be established as a regional landfill for non-hazardous waste and a landfill for non-hazardous industrial waste (Article 71 – Establishment of a non-hazardous waste landfill).

A regional landfill for non-hazardous waste may be established by a domestic or foreign legal entity in accordance with the Law on Concessions and Public Private Partnership. Also, the legislator provides that it **may be established by two or more municipalities or the City of Skopje** (paragraph 2, point 2) if local self-governments **have established a joint public enterprise** (paragraph 6), i.e. have established intermunicipal cooperation.

Through this mechanism, which allows associations to establish a public enterprise, municipalities carry out joint management of public interest of regional importance, whereby the state sets the policy framework through the obligation to develop regional waste management plans (RPMS), but delegates operational competence to local authorities. Such a legal option respects the principle of autonomy of local self-government, but also greatly encourages the process of mandatory inter-municipal cooperation to optimize resources and meet common waste management needs.

However, the councils of municipalities may adopt a decision by which the establishment of a regional landfill for non-hazardous waste with a regional waste management system is ceded to the Government of the Republic of North Macedonia (paragraph 3), whereby local jurisdiction can be transferred to the central level. With this decision, the legislator provides for a mechanism through which the state intervenes as a public policy bearer when local authorities decide to relinquish jurisdiction. In that case, the government may establish a public enterprise for the establishment of a regional non-hazardous waste landfill. In addition, the Government may establish a public enterprise for the establishment of a regional landfill if all municipalities belonging to a region do not establish the regional system within two years from the date of the adoption of the association agreement to establish a waste management system at the regional level (paragraph 4).

This mechanism opens up the possibility of limiting the autonomy of local self-government, but at the same time it is necessary to protect the public interest and prevent failure to establish an integrated system. In addition, the establishment of a regional landfill for non-hazardous waste may be entrusted by the Government to a domestic or foreign legal entity under the Law on Concessions and Public Private Partnership (paragraph 5). This provision allows for the implementation of the public-private

partnership model even in the context of unrealized inter-municipal cooperation, which is why the central government further expands the instruments for the implementation of public policies.

On the whole, the approach to the establishment of a regional landfill for non-hazardous waste is **conceived as a combination of mandatory and voluntary inter-municipal cooperation**, with a built-in mechanism for state intervention. Although the primary model based on inter-municipal cooperation has a voluntary component, its binding derives from the fact that regional waste management is established as a public priority, and the law limits the duration and possibilities for disposal. Thus, the balance between local autonomy and state intervention is achieved through a complete replacement of competence by the Government only when local self-governments will not realize their mandate within the stipulated deadlines or when they decide to cede it.

### 1.5.2. RESPONSIBILITIES OF LANDFILL FOUNDERS

The obligations of landfill founders, i.e. municipalities, arise primarily from **the need to obtain a landfill permit**, which is a prerequisite for its construction, operation and legal compliance.

According to the provisions of the Law on Waste Management, as it was pointed out earlier, a regional landfill for non-hazardous waste can be established by two or more municipalities or the City of Skopje, if they have established a joint public enterprise for this purpose. As landfill founders, municipalities are required to hold a landfill permit and an integrated environmental permit, which ensures that the landfill will operate in accordance with environmental and human health standards.

In addition, the founders have an obligation to provide **a financial guarantee**, which serves to cover the costs at all stages of the life cycle of the landfill: its operation, closure and post-closure care. The financial guarantee is of particular importance because it ensures the financial stability of the landfill for a period of not less than 30 years after its closure at non-hazardous waste landfills, or at least three years for inert landfills. This guarantee must be sufficient to cover the costs associated with the obligations set forth in the landfill permit.

In terms of financial aspects, the **founders bear full responsibility for all costs associated with the construction, management, monitoring and control of the landfill**. The law additionally provides that they are responsible for monitoring the environmental impact and are obliged to notify the competent authorities in a timely manner if they find significant negative impacts. **These obligations continue after the landfill ceases to operate**, when the developer is required to carry out the entire closure process, exercise control and care for the site in accordance with the issued permit, including monitoring of gases, leaks, and groundwater and surface water impacts.

When a landfill is established by several municipalities, as a result of inter-municipal cooperation, the role of municipalities is significantly expanded. In this case, **the municipalities jointly assume responsibility for all the above obligations**, which are carried out through a joint public enterprise as a form of inter-municipal cooperation. Such cooperation requires a clear distribution of competencies and obligations between the founders, determined by statutory and contractual acts. Financial transparency, democratic governance and operational efficiency are essential to ensure a functioning system.

The obligations of the founder or founders of the landfill derive from Articles 75, 76 and 77, as well as from Articles 83 and 85 of the Law on Waste Management (LMA).

### 1.5.3. INERT WASTE LANDFILLS

Although the Law on Waste Managementdoes not provide for a separate article for inter-municipal cooperation in the management of inert waste, it does not restrict such access.

Whereas Article 72 - Landfill for inert waste, permits the establishment of a landfill for inert waste by the "municipality or city of Skopje" through a public enterprise, while at the same time permitting the participation of domestic or foreign legal entities, There seems to be no legal obstacle for multiple municipalities to jointly form a public enterprise for the purpose of establishing and managing one such landfill.

On the contrary, the logic of the law – especially through the model of regional solutions for the management of non-hazardous waste – encourages the association of municipalities in order to achieve economic, technical and environmental efficiency. In this sense, the possibility of establishing an intermunicipal landfill for inert waste is in accordance with the principles of the Law on Waste Management, but also with the Law on Intermunicipal Cooperation, which allows municipalities to join together in the establishment of a joint public enterprise for the joint provision of public services.

This is particularly important in the context of smaller and underdeveloped municipalities, as the formation of a common landfill with larger urban centres allows for economies of scale, lower costs per unit of waste, joint maintenance of standards, and efficient allocation of infrastructure costs.

## 1.6. DATA COLLECTION AND SHARING OF INFORMATION ON REGIONAL WASTE MANAGEMENT – INFORMATION SYSTEM

The obligations related to the establishment and organization of the information system for waste management are set out in Articles 50, 98, 101 and 102 of the Waste Management Act. The system is based on the role of the municipalities that make up the region and the data derived from them (Article 98, paragraph 2). Municipalities are seen as generators of local data and their involvement in the regional and national system of monitoring, analysis and transparency in waste management is crucial.

Municipalities, i.e. waste management entities as basic units in the system, are obliged to **collect and submit information** on all relevant aspects of the generation, treatment and disposal of waste on their territory (Article 50, paragraph 1). Within the framework of regional cooperation, municipalities **submit this data to the expert body** (Article 50, paragraph 7) **and to the organizational unit for regional waste** management(Page 8). On the other hand, the unit processes the data, integrates it and submits it to the expert body as a consolidated annual report (Article 50, paragraph 9) and to the state authority (Article 98, paragraph 2 and paragraph 3). The unit is responsible for maintaining a waste management database at the regional level and providing information to interested parties on issues related to the regional system, as well as other public communication activities (Article 36, paragraph 10).

In parallel, municipalities have an obligation to participate in the maintenance of the **cadastre of waste producers** (directly from Article 128, paragraph 3, paragraph 16), which implies detailed records of economic entities and natural persons that generate non-hazardous waste.

In the context of inter-municipal cooperation, obligations related to the establishment of an information system acquire special weight, since such a system is based on a constant and coordinated exchange of data between municipalities. Sharing local information on waste and waste producers is one of the key mechanisms for monitoring trends in waste generation, selection and treatment, both locally and regionally.

With the support of SALAR, a website is being prepared to collect and publish data related to waste, which will be a good basis for establishing an information system.

Through the Regional Waste Management Organizational Unit, this data is connected, analyzed and presented in an integrated form, allowing all municipalities to better **understand the dynamics and challenges in waste management** within the region. This structured and regular data sharing not only promotes transparency and accountability, but also promotes **basis for collaborative decision-making and data-driven policy development**. Such an approach increases the effectiveness of **collective planning**, allows for assessment of status and identification of common priorities, as well as the development of regional activities leading to more efficient waste management.

In addition, the established information system contributes to **better public information**, which is a key aspect of democratic governance and transparency. The obligation to regularly publish data on waste management by the Regional Waste Management Organizational Unit not only provides public access to information, but also encourages greater accountability of all partners involved in cooperation. The collection, processing, and public presentation of data **strengthens citizens' trust in institutions**, fostering broader support for policies and investments related to waste management.

The Mayor of the Municipality and the City of Skopje are obliged to publish data on the state of waste management, on the progress made, future activities to improve the state of waste management, as well as on comparative data on the existing with the previous state of waste management, **on their websites** (Article 102).

The obligation of the Mayor to inform the public, i.e. the users of the services, of the conditions, manner and schemes for the collection and transport of municipal waste within the area of the municipality arising from Article 61, paragraph (3) are described earlier in Chapter 1.4.4.

In addition, service providers (public enterprises, joint public enterprises or legal entities entrusted with the provision of a public waste management service) that hold a waste management licence and are recognised by law as waste management entities, under Article 50, have an **obligation to keep records and report**. They are obliged, once a year, to submit the data from the records (e.g., the type, quantity and origin of the waste they manage, etc.) in the form of a consolidated report on a prescribed form to the competent authority. Service providers engaged in the collection and transportation of municipal waste are obliged to submit the data from the records to the organizational units, which, in turn, in the form of an annual consolidated report prepared in accordance with the prescribed form, to submit them to the competent authority.

Thus, the information system is not only a technical and statistical mechanism, but also a tool that strengthens inter-municipal coordination and supports the sustainability of common waste management solutions.

## 1.7. FUNDING

Funding for the planning, organization and implementation of waste management activities at the local and regional levels is governed in Chapter XIII. **Funding is designed as a joint commitment of municipalities**, with clearly structured obligations and mechanisms that directly encourage and deepen inter-municipal cooperation.

Article 104 – Sources of financing, defines the sources of financial resources for waste management at the regional level. Funds for the implementation of regional plans are provided through the budgets of the organizational units, the municipalities themselves and the City of Skopje, loans, donations, fees and other sources. In general, these regulations reflect **the shared financial burden between municipalities**, whereby the payment of part of the costs of construction and maintenance of installations – such as landfills, transshipment stations or processing plants – depends on the budgetary capacities of all local government units concerned. In practice, this requires strong coordination among municipalities for budget planning, mutual transparency and alignment with regional priorities.

Article 113 - Financing of municipal waste management programs, regional waste management plans and organizational units for regional waste management, specifies the remuneration for municipal waste management, which is in the amount of 2% of the price of services charged by service providers (public enterprise or other operator). regional plans, including to cover the costs of operating the organizational units for regional waste management. The obligation for municipalities to transfer 50% of the fee by the end of the month to the accounts of the centers for development of planning regions, creates an institutionalized mechanism for a regular, predictable and binding flow of resources for the needs of the regional system and the organizational unit for regional waste management.

Within the framework of the EBRD loan, technical assistance is provided for the development of a new methodology for calculating waste tariffs and a special department within the Regulatory Commission will be established to set prices. The establishment of this mechanism should allow for a steady flow of funds for the functioning of the RSWM.

In the context of inter-municipal cooperation, such arrangement allows for the distribution **of financial responsibility**, but also **for joint investment in infrastructure and operational needs**, which no municipality alone can handle. The obligation to jointly finance activities at the regional level creates an incentive for better coordination, planning and management of common resources, thereby advancing the economic sustainability and efficiency of the system of Waste management. In addition, this necessary dependency between municipalities strengthens transparency and accountability mechanisms, which are key to the sustainability of any inter-municipal initiative.

## 1.8. INSPECTION SUPERVISION

In the context of the statutory provisions on supervision in waste management, municipalities have a legal obligation to provide inspection supervision through **authorised environmental inspectors**. According to Article 115 - Competent authorities, paragraph 3 of the Waste Management Act, this competence is entirely within the jurisdiction of local governments. Article 118 - Mandate of the Authorised Environmental Inspector.

However, the practical application of this supervision is limited by the emergence of a shortage of professional personnel in the labour market and financial constraints especially among smaller municipalities to hire and systematize qualified inspectors, which reduces the efficiency in conducting supervision of waste management activities.

According to the Law on Intermunicipal Cooperation, municipalities have the opportunity to cooperate and implement the IMC through several forms relevant to the implementation of supervision. One form is the formation of a **joint administrative body**within one of the municipalities in the region. This body could unite and specialize human resources, as a joint inspection service, whose competence would apply to the territory of all municipalities involved in cooperation. This allows for economies of scale and professionalization of supervision. For example, a municipality with a developed inspection capacity can carry out inspection supervision in other municipalities under a contract.

Inter-municipal cooperation in the field of supervision not only increases the efficiency of waste management, but also contributes to achieving greater legal certainty and equal application of regulations over a wider territory, which is especially important in regions where waste disposal and treatment affect multiple local communities.

## 1.9. DEPRIVATION OF EXERCISE OF AUTHORITY

Article 129 of the Law on Waste Managementprovides for the possibility of depriving municipalities of their competences in the event of non-fulfillment of legal obligations related to waste management, and transferring those competences to the environmental authority at the central level.

The provisions of Article 129 of the Law on Waste Management impose direct intervention in the autonomy of local self-government justified by the public interest in the field of the environment and the protection of public health. However, the article provides that the revocation of jurisdiction is a last resort, which implies taking corrective action and instructions beforehand.

This confirms the intention to preserve the primacy of the municipality in waste management.

The retention of the revocable jurisdiction for up to a maximum of one year refers to the temporary nature of the measure and to the expectation that the municipality will create the conditions to regain its jurisdiction. This is an important element in the protection of autonomy, since it is not a question of permanent replacement, but of temporary intervention in exceptional cases. Finally, the intervention of the central authority is carried out "on behalf and at the expense" of the municipality or regional organizational unit. This means that the financial responsibility still rests with the local government.

## 1.10. CONCLUSIONS FROM THE ANALYSIS OF THE WASTE MANAGEMENT LAW FROM THE PERSPECTIVE OF INTER-MUNICIPAL COOPERATION

The analysis shows that inter-municipal cooperation is a mechanism for implementing the principles of universality, proximity and integration in waste management. The law recognises the need for multi-municipalities to work together in the planning, organisation and implementation of public services.

The mandatory nature of inter-municipal cooperation establishes the obligation of municipalities and the City of Skopje to establish a regional waste management system. The regional system is a basic model for integrated management, through which municipalities provide quality service, rational use of resources and compliance with national plans. which confirms the importance and necessity of functional inter-municipal coordination. Regional waste management does not limit local autonomy, but allows it to be effectively exercised through pooled resources and coordinated action.

The organizational setting of the mandatory inter-municipal cooperation is regulated in detail through the establishment of an Inter-Municipal Waste Management Board and an Organizational Unit for Regional Waste Management. The board represents the political and strategic structure of the cooperation, while the organizational unit, formed within the Planning Region Development Center, provides professional and technical support. This two-level mechanism allows for the long-term institutionalization of cooperation between municipalities.

The law provides for a number of specific areas in which inter-municipal cooperation can and should be realized, including:

- **Regional planning of waste management** through the development and implementation of common regional plans that harmonize local policies, infrastructure priorities and measures for the selection, processing and disposal of waste.
- **Establish an integrated waste management network** that can be organized at the level of one or more municipalities, including common transshipment stations, landfills and waste treatment plants.
- **Organizing the public service** with the possibility of forming a joint public enterprise or concluding contracts for the provision of services at the expense of other municipalities.
- **Landfill management** , especially through the establishment of joint public enterprises for regional landfills for non-hazardous waste by several municipalities, as well as the possibility of joint management of landfills for inert waste.
- **Support the information system and data exchange** through joint collection, processing and publication of waste management data.
- **Informing, educating and engaging the public** through the use of common communication channels of the municipalities involved.
- **Financing of regional systems** through joint budget participation and transfer of funds from waste management fees.
- **Inspection supervision** with the possibility of establishing a joint inspection service or administrative body to carry out supervision in several municipalities.

**The Councils of Municipalities and the Council of the City of Skopje play a key role in the establishment and management of inter-municipal cooperation**, ensuring legitimacy, consistency and transparency of joint activities. They decide on the accession to cooperation, the formation of joint public enterprises, the establishment of regional public-private partnerships or concessions, as well as the ceding of competences to the central government when necessary. Councils are the key democratic and institutional mechanism that provides legal basis, public scrutiny and political accountability in the implementation of inter-municipal cooperation.

Finally, **the Law establishes a balance between voluntary and compulsory cooperation**, whereby state intervention is envisaged only as a last resort in cases of dysfunction of the local system. Thus, inter-municipal cooperation is reaffirmed as a key instrument for creating a functional, economically viable waste management system, integrating local and regional interests into a common national policy.

# 2. ANALYSIS OF THE NATIONAL WASTE MANAGEMENT STRATEGY 2024 – 2036 (DRAFT, JUNE 2024))

**"The overall objective of the NSW 2024 - 2036 is to develop a sustainable, integrated waste management system in order to conserve resources, protect public health and prevent and reduce negative impacts on the environment, reduce greenhouse gas emissions and land degradation."**

The purpose of this analysis is to critically consider the strategic document on waste management 2024-2036 from the point of view of the degree of representation of intermunicipal cooperation as an alternative way of delivering local services, as well as the possibilities for practical application of mechanisms for inter-municipal cooperation in the realization of strategic goals. It aims to determine to what extent the proposed measures, institutional solutions and envisaged processes can be supported and realized through the potentials offered by inter-municipal cooperation.

The National Waste Management Strategy 2024-2036 (NWMS) presents the national waste management policy in North Macedonia and is a starting point for the preparation and implementation of an integrated and economical waste management system. The NWMS sets out the guidelines for proper solid waste management (SWM) for the next 12 years, outlines the steps to establish a future SWM system based on sustainability principles and serves as the basis for managing all waste streams.

The NWMS includes a description of the national legal and institutional framework for the SWM and the roles of the responsible institutions and stakeholders, i.e. government, municipalities, regional entities, industry and trade, and NGOs.

## 2.1. CURRENT STATE OF WASTE MANAGEMENT

In the section on the current state and waste management policies, the strategy referring to the Waste Management Law highlights the need for regional waste management and assigns responsibilities at the regional level as well.

From the point of view of legal regulation, the strategy points out that the Law on Waste Management is closely related to other laws, in particular the Law on the Environment, the Law on the Organization and Operation of Public Administration Bodies, the Law on Local Self-Government, the Law on Public Enterprises, the Law on Spatial and Urban Planning, the Law on Construction of Investment Facilities, the Law on Concessions and Public Private Partnership, Law on Public Procurement and Law on Water Management. However, **the NWMS does not recognise the Law on Inter-Municipal Cooperation as an opportunity at the disposal of municipalities** as one of the responsible institutions and parties concerned.

In Chapter 2.3 Institutional Framework, 2.3.2 Tasks and Responsibilities of Municipalities, the strategy describes the responsibilities of local self-government, pointing out that **the Councils of Municipalities have a key role in decision-making processes**. They have the power to decide on all aspects of solid waste management, including the financing, organisation and operation of municipal utilities, the establishment of public-private partnerships or the issuance of concessions to private waste collection operators.

In Chapter 2.3.3 Tasks and responsibilities of regional entities, it is stated that the Law on Waste Management prescribes **the establishment of regional cooperation between municipalities in the field of waste management**.

The Strategy identifies the **Inter-Municipal Board** and **the Organizational Unit** established within the Planning Regions Development Centers as institutional forms **responsible for the implementation of regional waste management**.

Moreover, of course, there is scope for the application of the forms of cooperation under the Law on Inter-Municipal Cooperation, in activities within the domain of waste management that include operations of collection, transportation, storage, processing, reuse, disposal and circulation of waste, including the supervision of these operations and the involvement of the parties concerned and raising public awareness. These forms of cooperation should be considered as an additional mechanism complementing activities that will not be covered or carried out by the Organisational Unit.

The further section of the text states that "In addition, the cooperating municipalities shall establish regional companies (organizational units) for the management of municipal waste in accordance with and/or participation of the MLSP, on behalf of the municipalities and their inhabitants, shall undertake the activities related to municipal waste management initially carried out by the municipalities." It is not entirely clear whether this refers to the Regional Waste Management Organisation or to a regional service provider or regional waste management system operator. As much as the English version of the document states that "Regional municipal waste management companies shall be established". In general, the text of the strategy notes terminological inconsistency with the Waste Management Act. It is also stated that the centres for the development of the planning regions were established on the basis of the Law on Inter-Municipal Cooperation, which is an oversight because they are formed under the Law on Uniform Regional Development.

Noteworthy in this chapter is the indication in the strategy document that "**the Government may allocate funds to encourage inter-municipal cooperation, including activities related to waste management**". This is a provision that essentially builds on Article 32 of the Inter-Municipal Cooperation Act, but is further extended to specifically cover activities in the field of waste management. The same article of the Law on Intermunicipal Cooperation defines that the Government may financially encourage and support inter-municipal cooperation of two or more municipalities in areas of wider importance and interest in carrying out activities in those areas. The Government, on the proposal of the Ministry of Local Self-Government by an act, identifies activities of wider importance and interest, for which it will be able to allocate financial resources to encourage inter-municipal cooperation. Hence, waste management should be included in the list of activities of wider importance and interest in order to fulfil the prerequisite for allocating funds from the central budget through this legal mechanism. The Ministry of Local Self-Government should be actively involved in enabling these preconditions.

**The allocation of funds from the central budget to encourage inter-municipal cooperation is an important mechanism for improving the waste management system, with mutual benefits for both the central government and local self-government units.**

Through financial support from the central budget, the Government demonstrates readiness for the implementation of national policies in waste management and at the same time sends a message to municipalities that inter-municipal cooperation is an effective instrument for improving the quality, accessibility and efficiency of local public services. In this way, the central government affirms inter-municipal cooperation as a systemic approach in the implementation of decentralized competences and as a means of strengthening waste management and solidarity between municipalities.

From the point of view of local self-government, the allocation of funds from the central budget represents an incentive for active participation in inter-municipal forms of cooperation, which are

supported by additional financial resources, necessary for the establishment of functional and sustainable waste management systems.

Chapter 2.3.4 Other **Parties Concerned**, identifies key actors such as the 'collective actors' implementing the extended producer responsibility schemes, the companies using SWM services and companies providing services to the SWM, as well as non-governmental organisations (NGOs) and professional associations, the informal sector and the general public. It is noteworthy that this section pays attention to **the informal sector** which predominantly consists of vulnerable groups, e.g. Representatives of the Roma community, who are involved in the reuse and recycling of waste materials and their sale. The activities of these groups are carried out both in urban areas, where waste is removed from waste containers/containers, and in landfills where waste is picked up after unloading from waste collection vehicles. At landfills, they are exposed to air pollution as a result of waste combustion and the risk of injury and infection in contact with the waste. Chapter 2.6.1 also points out that the collection of metals (iron and aluminium) is also carried out by the informal sector. The strategy merely acknowledges the presence of the informal sector without specifying the consequences. In this regard, a digression with the description of this issue in the National Waste Management Plan[7] points out that the underdeveloped market for recyclable waste materials is often obstructed by the informal sector. The plan also states that in identifying problems in POP regimes, it is necessary to address the problem of the informal sector, Which, reportedly, separately collects only the IMCt valuable materials. As a challenge, this phenomenon is also highlighted in the "Basic Study on Solid Waste Management in the Southwest and Pelagonia Region" which points out that a large part of the separate collection is carried out by the informal sector, which creates conflicts with utility companies that provide equipment and waste selection facilities. **Addressing the issue of the informal sector within the framework of the regional waste management system, which is also a social category, deserves to be considered in an inter-municipal context and in cooperation with the municipalities involved**.

Without this analysis delving deeper into the current state of municipal solid waste management, from the point of view of inter-municipal cooperation, it is also important to point out that the strategy highlights as significant the difficulties **in providing funds for the implementation of waste management plans** that are also under the competence of the municipalities, and are referred to in Chapter 2.4 Economic Issues. This undoubtedly points to the need to create conditions for economies of scale that can be achieved achieve through inter-community cooperation, as well as a common approach in making use of available financial mechanisms (EU-IPA, bilateral donations, etc.).

## 2.2. STRATEGIC GOALS AND OBJECTIVES

The overall goal of NWMS 2024 - 2036 is to develop a sustainable, integrated waste management system in order to conserve resources, protect public health and prevent and reduce negative impacts on the environment, reduce greenhouse gas emissions and land degradation. Furthermore, an integrated system should include: prevention of waste generation, avoidance of landfilling of recyclable waste, reduction of the share of biodegradable waste in landfills, reduction and mitigation of the negative impact of landfilled waste on the environment, climate and human health, and waste management according to the principles of a circular economy.

To meet the stated needs, and to meet the general objective, short-term targets are envisaged to be met in the first six years of the adoption of NWMS 2024-2036. The long-term goals are projected to be realized by 2036 and assume a fully established and functional system.

[7] Waste Management Plan of the Republic of North Macedonia for 2021-2031

From the defined short-term and long-term goals that are related to various steps and activities in the waste management process, it is noticeable that the **greatest burden falls on municipalities and regional institutional forms of inter-municipal** cooperation – the board and the organizational unit. Waste.

## 2.3. MEASURES FOR THE IMPLEMENTATION OF THE WASTE MANAGEMENT STRATEGY

The successful implementation and operation of an integrated and sustainable waste management system depends on the provision of full political commitment and the establishment of favourable conditions for implementation. Such conditions relate to waste management legislation, institutional and organizational set-up, human resources with skills and technical/managerial capacities, financial resources, protection of natural and cultural heritage, involvement of stakeholders and raising public awareness regarding waste issues, as well as research, innovation and development activities. Therefore, the implementation measures of the NWMS will need to cover these aspects.

Given the position of local self-government in the integrated waste management system, a significant part of the above conditions should be provided at the local and regional levels. Hence, the further course of the analysis will be concerned with the consideration of measures and potential opportunities for their implementation in support of inter-municipal cooperation.

### 2.3.1. DEVELOPMENT OF THE LEGAL FRAMEWORK AND COMPLIANCE WITH THE ACQUIS COMMUNAUTAIRE

As stated in the Strategy, waste management legislation defines the conditions for the functioning of the integrated system and is already largely aligned with European standards. Although no further amendments are currently required to implement the NSA, the legal framework will need to be further developed as part of the EU accession process and to respond to future needs and requirements. The strategy lists procedures for securing permits for the construction of landfills, as well as legal measures to promote recycling and the use of secondary raw materials as potential interventions in the legal framework.

Although the strategy and its action plan do not identify municipalities as actors in the implementation of this measure, inter-municipal cooperation can directly contribute to the development of the legal framework in several ways. The association of municipalities in regional systems, especially through the Inter-Municipal Waste Management Board as a political-strategic mechanism creates conditions for the creation of a single voice of the municipalities involved and a more effective channel of communication with the central institutions when supplementing or amending the legal framework, especially in cooperation with ZELS. Through regional coordination within the Organisational Units, municipalities can jointly collect data, monitor waste flows and establish monitoring systems that are necessary for future European commitments. Such systems will also facilitate regular updating of legislation, as central institutions will have consistent and comparable regional data.

This approach is in line with the competence of the board, and in particular under paragraph 10 of Article 31 of the LWM, which states that the board "initiates consideration of issues related to the regional system that require coordination between municipalities or the city of Skopje, state agencies and institutions, and partners from the private and civil sectors.“

### 2.3.2. INSTITUTIONAL AND ORGANIZATIONAL SETUP, HUMAN RESOURCES

In this chapter, the Strategy emphasizes the need for effective institutional and organizational arrangements at all stages of the implementation of the integrated waste management system: from planning, permitting, financing, to implementation. Adequate human resources and capacities are essential for the establishment of an integrated waste management system, especially in the public and private sectors.

Referring to the Law on Waste Management, the Strategy points out that a wide range of responsibilities have been delegated to local authorities and therefore they **should develop their waste management capacities at the local and regional levels**. In addition, municipal representatives, responsible for waste management issues, will be organized into departments or offices and assigned tasks to plan waste management activities, including activities that support the establishment and operation of a waste management system at the regional level and a regional waste management enterprise from a legal, organizational and financial point of view.

From the administrative, organizational and financial side, tasks such as planning, investment management, public relations and organization of other activities related to municipal waste management, originally addressed to the municipalities, will be carried out within the framework of waste management at the regional level, for which Inter-Municipal Waste Management Board will be established and Organizational Units for Regional Waste Management will be established within the Planning Development Centers regions.

The strategy sees the Organizational Units for Regional Waste Management as a **central regional agency**, performing various expert tasks such as planning, investment preparation, local regulation, organization, cost recovery, and financing and monitoring of the environment. To be able to perform these tasks, organizational units need to be adequately staffed, but **The strategy does not define the organizational structure, the number and profile of employees in the Organizational Unit, nor the means necessary for its functioning**. Such an approach can result in arbitrary staffing and an inadequate and cumbersome organizational structure and a large administrative apparatus.

Regional waste management companies will work on behalf of municipalities and they will assume IMCt of their operational responsibilities, such as providing services for collection, transfer, processing and final disposal of waste. With the formation of regional waste management enterprises, additional employment will be required.

From the point of view of institutional preparedness and use of resources, **inter-municipal cooperation can contribute** to the realization of certain activities of the waste management process within the framework of regional management **through clearly shared responsibilities to avoid overlapping with the competencies of the Organizational Unit**.

Bearing in mind that **the integrated waste management system is largely expected to be realized through project implementation**, measures will be taken to strengthen the capacities of the public sector for the preparation of project documentation, implementation, monitoring and evaluation of projects, as well as further building of organizational capacities based on lessons learned. For these measures, the action plan provides for the implementation of on-the-job training and training (by the Ministry on Environment and Physical Planning), attracting and retaining highly qualified and motivated staff.

The Strategy envisages measures to be taken to facilitate the establishment of Regional Waste Management Enterprises and Organizational Units for Regional Waste Management within the Planning Regions Development Centers, as well as measures to build human resources and build the technical and financial capacities of these organizations. Activities by the Ministry on Environment and Physical

Planning are envisaged to support and increase the capacities of municipalities and organizational units for the establishment of regional waste management enterprises and ensuring that these enterprises are adequately equipped and equipped. Also, the staff of regional enterprises are provided to attend special training and on-the-job training to acquire special knowledge.

In order to exchange and develop knowledge in the Organizational Units for Regional Waste Management, regional waste management enterprises and municipalities, the Action Plan plans to implement national workshops by the Ministry on Environment and Physical Planning for the provision of waste management services in the regions.

In addition to the measures envisaged in the Capacity Building Strategy at local and regional level, based on a training needs analysis, which can be carried out through the establishment of a joint working group or externally engaged experts, joint trainings can be carried out at the regional level through inter-municipal cooperation.

### 2.3.3. FINANCIAL AND ECONOMIC MEASURES

Financial and economic measures in integrated waste management are aimed at ensuring stable financing, equitable remuneration and the use of economic instruments to reduce waste and divert it towards recycling and reuse. In this process, bearing in mind that municipalities and public utility companies (PUCs), as well as regional institutional mechanisms are listed as key actors in the action plan, inter-municipal cooperation can constitute an important mechanism that will contribute to strengthening advocacy, coordination and mobilization of financial resources.

Through the Inter-Municipal Waste Management Board, whose competence provides for initiating matters requiring coordination between municipalities, state institutions and the private and civil sectors, more effective joint lobbying before national institutions and the Regulatory Commission for the creation of fair tariffs, applicable economic instruments and sustainable financial models can be ensured. This common platform allows for more aligned positions and greater weight in advocating for systemic financial solutions.

In the area of collection improvement, through the Organizational Unit and with inter-municipal coordination, harmonized, regional information and educational campaigns can be carried out that will target all waste producers and contribute to higher collection of fees. By pooling resources, municipalities can implement more quality and comprehensive campaigns than if they were to perform individually, and such an approach is necessary because it establishes a unified regional model whose application applies to all partner municipalities in the region.

When it comes to investments and operating costs, in addition to the commitments of the Strategy to secure funds from the government's budget, the regional approach increases the possibility of attracting funds from donors and EU funds. Joint project applications, unified data and regional plans increase competitiveness, and priorities can be formulated in a coordinated manner through the Inter-Municipal Board, and with the support of the Organizing Unit, mobilize the private sector and improve access to financial instruments for the implementation of infrastructure and services.

### 2.3.4. EXTENDED PRODUCER RESPONSIBILITY

Although Extended Producer Responsibility (EPR) schemes for packaging waste, electronic waste and batteries and accumulators have been established in the country, their effectiveness is limited, and schemes for IV, tyres, waste oils and textiles have not yet been established.

In the system of extended producer responsibility, inter-community cooperation is an important mechanism for improving the performance of existing and future EPR schemes.

With coordinated regional action, municipalities can provide harmonized standards for the placement of containers, vending machines and other infrastructure solutions, creating a unique and predictable model for all collective actors and economic operators.

### 2.3.5. PHYSICAL PLANNING

Physical planning is a key prerequisite for the implementation of an integrated waste management system, as it provides timely allocation of land for regional landfills, transshipment stations and other necessary infrastructure, respecting the necessary standards.

In addition to the guidelines for regional landfills for non-hazardous waste, the Strategy points out that **through inter-municipal cooperation municipalities will have to create landfills for construction waste** (with land plots with an area of approximately 10 hectares), which will contribute to the reduction of their number.

It is important to keep in mind that the state plans to set up a working group for the preparation of urban planning documents for all locations designated for waste management infrastructure, composed exclusively of central government institutions. The absence of local governments in this process increases the importance of inter-municipal cooperation as a platform through which municipalities can articulate their views and needs in a coordinated manner, especially when taking measures by central authorities to identify locations for additional waste infrastructure.

### 2.3.6. INVOLVING STAKEHOLDERS AND PUBLIC AWARENESS

The involvement of stakeholders and raising public awareness are necessary for successful waste management, but these activities can yield results only if they are carried out in parallel with the improvement of services.

In doing so, the Strategy distinguishes between the responsibilities of different levels of government. Raising public awareness and public education is the responsibility of the government, as well as non-governmental organizations, collective managers, professional associations dealing with waste management, and educational institutions. On the other hand, public awareness campaigns, which will take place under the implementation of improved waste management, will be organised by local authorities in collaboration with the PUC, collective actors and Organisational Units.

As an additional measure, an educational campaign is envisaged to inform the general public (but also waste creators) about how adjusting their buying and consumption habits can reduce the amount of waste generated and what the environmental benefits are.

Campaigns would be conducted through media, brochures, public events and organized visits to infrastructure facilities, with special emphasis on educational programs in schools and higher education. At the regional level, in addition to the activities of the Organizational Unit, municipalities can apply inter-municipal cooperation with pooled resources, implement higher-quality, more comprehensive and far-reaching campaigns, ensuring higher visibility, greater credibility and more effective involvement of citizens in the new regional waste management system.

### 2.3.7. IMPROVING DATA QUALITY

Access to reliable data is key to the planning, sizing, and financial setup of a waste management system. To this end, it is necessary to strengthen national electronic data collection and processing systems, which will allow for uniform and electronic reporting. However, the quality of the data depends on the accuracy of the primary measurements, so measures are envisaged to install calibrated equipment and improve basic data on waste quantities and flows throughout the system.

A key role in data collection is played by regional enterprises and the Organisational Unit through inter-municipal cooperation and coordination, which allows data to be collected and processed in a uniform manner across regions, rather than each municipality operating with different methodologies and standards. Furthermore, the data are aggregated and used by various institutions such as the Statistical Office and the Macedonian Environmental Information System.

### 2.3.8. TECHNICAL MEASURES FOR THE IMPLEMENTATION OF INFRASTRUCTURE AND EQUIPMENT FOR WASTE MANAGEMENT SYSTEM

The measures presented in the previous sections are important for creating a conducive environment for the implementation of an integrated and sustainable waste management system, but it is necessary to take technical measures to establish the system with the necessary infrastructure and equipment. In addition to the responsibility of the relevant ministry for the construction and equipping of the regional waste management system (regional landfills and loading stations), the ministry, together with the municipalities, the Inter-Municipal Board and the Organizational Unit are responsible for planning, preparation of the necessary technical documentation, construction and equipping of additional waste management infrastructure, including inert waste landfills, waste treatment and processing facilities, etc..

## 2.4. CONCLUSIONS FROM THE NATIONAL WASTE MANAGEMENT STRATEGY ANALYSIS 2024-2036

The analysis of the National Waste Management Strategy 2024–2036 shows that the document ambitiously sets out the national framework for the establishment of an integrated, regional and sustainable waste management system, aligned with European standards. In the chapter on the current situation, the strategy clearly identifies that existing fragmentation, inefficient local systems and insufficient equipment of municipalities are a key cause of systemic weaknesses, which is why the regional model is set up as the only feasible solution for consolidating infrastructure and services.

Although the strategy and its action plan do not recognize municipalities as direct actors in the development of the legal framework, cooperation through the Inter-Municipal Board as a political-strategic mechanism can essentially contribute to the advancement of legislation by initiating and considering issues related to the regional system that require coordination between municipalities or the city of Skopje, state agencies and institutions and partners from the private and civil sectors. Despite recognising a regional approach, the strategy does not recognize the Law on Inter-Municipal Cooperation and its potential to create functional mechanisms for organizing and implementing activities related to waste management.

The Inter-Municipal Board and the Organizational Unit are key carriers of the regional system, with the strategy describing them as the engine of reform, but does not provide a description of the organizational structure, skills required, number of employees, or resources that will be necessary for their functioning.

Limited financial capacity to implement the system, including insufficient collection, poor financial discipline and unequal cost distribution are the key financial challenges. In doing so, the need for economies of scale is clearly imposed, which directly confirms the value of inter-municipal cooperation as a means of reducing costs, appearing together with donors, and increasing opportunities for the use of European and national funds. Particularly noteworthy is the indication in the strategy that "the Government may allocate funds to encourage inter-municipal cooperation, including activities related to waste management", which is directly related to provisions of the Law on Inter-Municipal Cooperation. This opens up a significant systemic funding channel that needs to be explicitly activated under the Law on Inter-Municipal Cooperation.

The chapter on extended producer responsibility indicates that the effectiveness of current POP schemes is low and that certain waste streams are not yet covered. A regional approach in this area can significantly put an end to misaligned local practices, providing a model in which collective stakeholders work with standardised, regionally defined solutions – which reaffirms the value of inter-municipal cooperation as a mechanism for unification and performance improvement.

The strategy emphasizes the importance of timely preparation of spatial and urban plans for the necessary infrastructure. However, the fact that planning working groups are led exclusively by the central government, without the involvement of municipalities, creates a risk of insufficient local acceptability and implementation challenges. This further imposes association as a platform through which municipalities can co-ordinate their positions and ensure a coherent local approach, especially on such issues through the functioning of the Inter-Municipal Board.

To raise public awareness and involve the parties concerned, it is affirmed that all communication activities must be parallel to the promotion of services, as the public reacts on the basis of real improvement, not just campaigns. Moreover, regional communication programs, organized through the coordination of municipalities, public utilities and the organizational unit, can provide greater impact, unified messages and lower costs than fragmented local initiatives and initiatives implemented by central authorities alone.

The strategy points out that data management requires consistent, reliable and uniform information, stressing that accurate measurement is a prerequisite for system sizing, cost planning and meeting EU commitments. The envisaged strengthening of national electronic systems will only be effective if municipalities and regional entities collect data in a harmonized manner. Inter-municipal cooperation emerges as a key mechanism for harmonization of methodologies, joint collection and analysis of data, which will ensure stability, comparability and accuracy at regional and national level, and especially in the transition period until the final establishment of the information system.

Finally, the technical measures chapter of the strategy confirms that the establishment of the system depends not only on infrastructure, but also on the administrative and technical capacity of municipalities to prepare, plan and implement technical documentation and services. In this section, the strategy IMCt clearly positions both the Inter-Municipal Board and the Organizational Unit as active actors in the establishment of the integrated system, highlighting the need for strong coordination, shared resources and gradual capacity building. Inter-municipal cooperation, as an additional and flexible mechanism, can provide significant support through the sharing of expertise, human resources and technical support between municipalities.

# 3. ANALYSIS OF THE WASTE MANAGEMENT PLAN OF THE REPUBLIC OF NORTH MACEDONIA FOR 2021-2031

**"The aim of this Plan is to give clear directions/activities to be followed, in order to develop integrated waste management in accordance with the waste hierarchy and EU law, to achieve environmentally friendly processing and disposal, in a way that is best adapted to the conditions in the Republic of North Macedonia."**

The analysis of the Waste Management Plan of the Republic of North Macedonia 2021–2031 seeks to consider the possibilities of applying inter-municipal cooperation in the measures and solutions envisaged by the document, as well as to determine to what extent the IMC can contribute to the implementation of the planned objectives. The plan promotes an integrated regional approach as a basic model for the development of a sustainable waste management system, based on economies of scale, interregional use of infrastructure and enhanced coordination between institutions.

Given that local governments and public utilities are key carriers of activities on the ground, and as an additional mechanism there is the Law on Inter-Municipal Cooperation, this analysis focuses on determining where the IMC can further provide more efficient organization, lower costs, better quality planning and faster realization of the regional infrastructure envisaged in the Plan.

The analysis examines the strategic, legal, and operational aspects, identifies systemic weaknesses, and proposes guidance on how the IMC can contribute to overcoming administrative, technical, and financial constraints in the process of establishing an integrated regional system.

## 3.1. WASTE MANAGEMENT POLICY AND INSTITUTIONAL FRAMEWORK

In the chapter "Waste Management Policy in RNM" and the section "Waste Management Plans and Programs" of the National Waste Management Plan 2021–2031, it is emphasized that the state policy is aimed at establishing an integrated and functional regional infrastructure for waste collection, selection and treatment. The government places emphasis on primary waste selection at the site of generation, prioritizing recyclable materials and biodegradable waste as a prerequisite for a more efficient system and for reducing the quantities that end up in landfill.

The municipalities, organized into eight waste management regions, apply the principle of waste management at the site through **regional plans** adopted by municipal councils on the proposal of inter-municipal boards. This confirms their obligation and role in the operational implementation of waste selection, collection and treatment policies in accordance with the regional approach. waste management by legal entities and individual traders, as well as the obligation for producers to prepare extended liability programs for specific waste streams.

The principles and elements of the circular economy and waste management according to the waste hierarchy as a basic principle are represented in this Plan and in all the above strategic, planning and program documents.

In the chapter on the institutional framework for waste management, it is emphasized that **the responsibilities are shared between the MEPP and other central government bodies**, as well as **municipal institutions**.

At the national level, **the Ministry of Environment and Spatial Planning** (MEPP) has a central role, with responsibility for setting standards, issuing permits, monitoring and harmonizing legislation. The Waste Management Sector within the Ministry leads the implementation and coordination of related policies and projects. **Inspection supervision** is carried out by the State Inspectorate of the Environment, while market surveillance is under the jurisdiction of the State Market Inspectorate.

The focus on **institutional set-up at the local level** is placed on the establishment of **inter-municipal boards**, which constitute a key structure to support integrated regional waste management. Municipalities have an obligation to implement the measures and objectives envisaged in the strategic and program documents of the Law on Waste Management, as well as to ensure their implementation through their own jurisdictions and public utility companies. within the framework of the new system, the role of the **regional system operator** and the **organizational unit formed in the Centers for Development of Planning Regions**, which is the bearer of the main activities for the functioning of the regional infrastructure, is particularly important.

Supervision at the local level is **carried out by authorised environmental inspectors** and local **utility inspectors**. In terms of resources, it is estimated that the functions of local inspection and enforcement are under-resourced, at least one-third less than necessary. This resource is expected to grow each year with the inclusion of additional inspectors due to the continued development of the More waste management installations and strengthening producer responsibility. For such a situation, a solution can undoubtedly be found through inter-municipal cooperation by carrying out inspection supervision by one municipality for other municipalities in the region or by forming a joint administrative body - the Regional Inspectorate for Environmental Protection and/or Communal Activities.

The chapter highlights other factors involved in the system, such as ZELS, chambers of commerce, trade unions, public service providers, civil society organizations and academic institutions. In addition, weak institutional practices, limited coordination and lack of systematic communication and guidance are identified as key challenges, indicating the **need for more regular consultation and dialogue between central institutions, municipalities, industry and other stakeholders**.

This also opens up space for the systemic role of the ZELS as the representative of the municipalities, especially with the support and solutions of the inter-municipal boards, can ensure a higher level of coordination, a single voice of all municipalities towards the MWSP and other central institutions, and contribute to harmonized views and recommendations that apply to all regions, not just individual regions. Although ZELS is not a typical example of inter-municipal cooperation, it can be considered in this context as a consolidated institutional approach of municipalities to central governments.

The chapter on the legal framework **establishes the Law on Waste Management the basic act that regulates the waste management system in the country.** The management of special waste streams is also governed by the Law on Packaging and Packaging Waste, the Law on Electrical and Electronic Equipment Management and the Law on Waste Electrical and Electronic Equipment Management, as well as the Law on Battery and Accumulator Management and the Law on Waste Batteries and Accumulators Management.

In this context, it is important to note that **the Plan does not recognize the Law on Inter-Municipal Cooperation**, nor in the legal framework, nor does it recognize inter-municipal cooperation in the remainder of the document as an alternative way of delivering local services. This derives from the conceptual approach of the Plan, which relies on the development of an integrated and functional regional waste management system regulated exclusively through the Waste Management Law. **the opportunities offered by the Law on Inter-Municipal Cooperation should be seen as an additional solution to overcome systemic weaknesses and operational gaps, not as a substitute for a regional approach, but as a mechanism that can strengthen its functioning in phases when capacities are not yet fully provided.**

The Plan clearly states that although the current Waste Management Law establishes the framework for the establishment of waste management infrastructure which is predominantly based on **the undertaking of activities by local self-government units**, it nevertheless shows weaknesses and inadequacies in cases where there are insufficient local self-government capacities in finding funds for the construction of new waste infrastructure, and the inability to ensure mutual coordination. In addition, from the experience so far, it is shown that **the development of waste infrastructure requires large financial resources**, for the discovery of which it is necessary to have **a clearer definition of the competencies and obligations between the central and local** governments.

Inter-municipal cooperation can help overcome some of the financial and administrative weaknesses by applying for joint projects, sharing equipment, and joint administrative teams. However, the chapter makes it clear that some of the problems arise from insufficiently defined competencies between levels of government — an issue that cannot be solved solely by cooperation between municipalities.

## 3.2. REGIONAL PLANNING AND SERVICE DELIVERY

The collection and disposal of waste is the responsibility of municipalities, but, if each of them acts separately, it will have negative consequences for national efforts to achieve EU standards in waste management. Therefore, the Waste Management Sector of the Ministry of Waste Management of the Ministry of Waste Management of the Ministry of Agriculture carried out the necessary analyses and preparations for the introduction of an integrated regional approach and the creation of eight waste management regions with inter-municipal boards, composed of the municipalities that are part of each of the regions, and which are represented by the mayors.

However, as outlined in the Plan, the 2020 EBRD analysis shows that the IMCt cost-effective solution is **to establish common interregional waste management systems**, i.e. the Pelagonia and Southwest regions, the Southeast and Vardar regions, and the Eastern and Northeast regions each having one common system.

This approach will allow for the realisation of better collection, transport and disposal of waste and the construction of sanitary landfills, in accordance with national and EU landfill legislation. The investment also includes the procurement of municipal waste containers and the procurement of vehicles for the collection of municipal waste. i.e. within the Development Center of each planning region in which an agreement has been concluded, **an Organizational Unit for Regional Waste Management shall be established**.

According to the Plan, the organizational units for regional waste management **are key organizations** and a **link between the state and the regional system**. They **support local governments** by leveraging economies of scale and more efficient waste management.

As stated in the Plan, in order to ensure the effective functioning of the system, administrative **structures**, **communication**, **roles and responsibilities at all levels should be clearly laid out**.

### 3.2.1. RESPONSIBILITIES OF THE REGIONAL WASTE MANAGEMENT ORGANIZATIONAL UNIT

In terms of the foregoing, the Plan sets out a framework for the responsibilities and work that the organizational unit would perform.

In summary, if unit employees are fully trained and complete, they may also be responsible for infrastructure planning and investment planning, public relations, and organizing other activities pertaining to regional municipal waste management.

To build the capacity of employees in organizational units, the MEPP should organize trainings, prepare standard operating procedures and provide support.

The plan also indicates that these bodies will contribute to greater opportunities to strengthen and develop the capacities of professional staff in the regions, contribute to the proper management of transshipment stations and landfills, as well as opportunities for recycling, processing and waste reduction. Units should contribute to opportunities for regional educational programs, greater transparency and control, Cross-border use of plants, savings in public procurement, trust from the central government and optimised regional waste collection as optimal financial coverage. In the data section, the unit should collect data from public utilities that carry out collection and transportation, as well as from the regional enterprise that manages landfills and transshipment stations. the unit should prepare reports to inter-municipal boards and the Ministry. For this purpose, the organizational unit should designate a person responsible for collecting data for the entire region, i.e. a regional data specialist who prepares and delivers the information to the central government.

An important element is the Extended Producer Responsibility (EPR), which requires involvement in monitoring, coordination, and reporting by organizational units, as well as addressing the problem of the informal sector selectively collecting valuable materials.

On the other hand, it is worth analyzing the WMA, from which it is evident that the responsibilities of the units defined in the Plan are significantly expanded. Thus, according to the provisions of the Law, the Organizational Unit formed within the Planning Region Development Center is the **professional administrative and technical service of the Inter-Municipal Board**. It is responsible for preparing the regional waste management plan, defining the annual goals to be achieved in the region, and preparing and proposing projects and activities for its implementation. The unit implements and manages projects, coordinates all investment activities, prepares the selection of the regional system operator, and provides contractual services and waste management capacities. It monitors the implementation of the regional plan, prepares an annual work report and an annual work program. It also prepares proposals related to waste management activities and services. The unit performs other work entrusted to it by the board and is obliged to inform the Ministry and the founders on an annual basis of the goals achieved and the necessary improvements. In addition to maintaining a regional database, it also provides information to the public. It is also responsible for organizing the information system at the regional level, processing and submitting data to central authorities, maintaining a cadastre of waste creators and publishing data on the state of waste management. In addition, the unit participates in the closure and reclamation of non-standard landfills within legally established deadlines. The organisational unit retains competence for all tasks assigned by law and regional agreements, with an obligation to act in a timely and efficient manner, otherwise the mechanism of revocation may be triggered.

Even the draft Waste Management Strategy 2024-2036 indicates that the units in the Regional Centres can also function as a central **regional agency**, performing various expert tasks such as planning, preparation of investments, local regulation, organisation, cost recovery and financing and monitoring of the environment.

In summary, the Organizational Unit is the key institutional axle between municipalities and the state waste management system. Its structure must ensure good planning (infrastructural and financial), strong project management, legally compliant reporting, education, effective coordination and transparency.

Until all the necessary prerequisites are provided for the full and effective functioning of the Organizational Unit, which should have the administrative, technical and professional capacity to perform all obligations arising from the Law and the Waste Management Plan, **part of its functions may be temporarily realized through the mechanisms of inter-municipal cooperation**. This approach allows for the timely provision of certain services and activities that are necessary for the functioning of the integrated waste system, while avoiding the risk of congestion while institutionalizing the Organizational Unit in its entirety.

To achieve the above, it is particularly important to carry out a **comprehensive functional analysis**, which will determine which **competencies are critical** and must be located within the Organizational Unit from the outset. In the context of a regional approach, the analysis should also identify those **functions of the unit that can be performed through inter-municipal cooperation**, especially those operational tasks for which there are already developed capacities in certain municipalities or public enterprises, and which do not require immediate institutional reinforcement in the first phase. Also, functional analysis will help **create the organizational structure of the unit**, as well as in measuring the **number and description of jobs**, and **the human resource profile** necessary to perform the specified functions.

Such a gradual approach allows for the parallel establishment of the Organizational Unit and the smooth continuation of the activities envisaged in the Law and the Plan. Thus, it is ensured **that the system functions sustainably during the transition period**, while the Organizational Unit strengthens its human resources, administrative procedures and technical capacities, and then takes over all the functions that must be performed in its competence in the long term.

### 3.2.2. EXTENDED PRODUCER RESPONSIBILITY

As stated earlier in the Plan, an important element is the expanded responsibility of producers, which requires the involvement of organisational units in monitoring, co-ordination and reporting.

The Plan also points out that **the key stakeholders** in improving producer responsibility **have interrelated and complementary responsibilities**: producers, traders and distributors are involved in organising and financing separate waste flow systems, while municipalities provide infrastructure and conditions for separate collection, designate collection sites and take measures to meet national targets. Collective and independent contractors have an obligation to finance or co-finance the operation of collection centres, to cooperate with municipalities and authorized collectors, and through contracts to regulate the flow of waste, collection and recycling targets, logging and reporting, ensuring a level playing field for all participants in the system.

The financing of the system for the management of special waste streams is based on the principle of total net coverage, which covers all activities from collection and treatment to processing, as well as public awareness, prevention and surveillance campaigns. To ensure efficient operation, clear, transparent and pre-agreed models are needed through which producers will cover costs, including compensation to municipalities when they are involved in separate collection. The funds provided by the producers will be used to finance the services that municipalities offer to citizens, as well as for activities to raise public awareness and improve separate collection systems, according to the annual financial program established by law.

Inter-municipal cooperation in the context of producer responsibility and financing of separate waste stream systems can be a significant reinforcement of the efficiency of the entire model, especially in the areas of infrastructure, organisation and financial sustainability. In terms of commitments, multiple municipalities can jointly establish and manage meeting centers, allowing for cost optimization, more efficient coverage of the territory, and better coordination with collective and individual stakeholders. By working together, municipalities can more easily establish uniform standards for locations, infrastructure, and modes of record, which strengthens transparency and makes it easier to follow up on targets.

In the finance sector, through shared models of inter-municipal cooperation, municipalities can ensure equitable cost distribution, reduce infrastructure fragmentation, and create stronger partner capacity in negotiations with producers and suppliers.

### 3.2.3. MUNICIPAL WASTE INFRASTRUCTURE PLANNING

Municipal **waste management infrastructure planning** requires significant investment and the gradual establishment of all components – from collection and transport to transshipment, sorting, recycling and processing to generate energy, and in accordance with local circumstances and RPWM requirements. Although the infrastructure needs to be planned as a whole, its construction and operation will be developed in stages, in order to provide universal access to waste selection.

Funding will be provided by producers under the regulation on special waste streams, and separately collected waste must be directed to authorised recycling or processing plants, rather than landfills.

The Plan promotes the **interregional cooperation** of regional waste management enterprises, which becomes key after the establishment of the basic infrastructure, as it allows for the rational management of separately collected materials for recycling or their processing for energy production. This cooperation allows the regions to pool waste quantities, establish common standards and coordinate with collective and independent and act in a way that creates a stable, predictable and economically viable system. Due to the limited quantities generated by each region individually, economies of scale take on particular importance, whereby a single central recycling or processing capacity can efficiently serve 3–4 regions, which reduces the need for more expensive installations, optimizes logistics costs, and ensures higher equipment utilization.

### 3.2.4. BIODEGRADABLE WASTE

The management **of biodegradable waste** requires a complete transformation of the existing system, as currently allMCt all quantities end up in non-standard landfills, although this waste accounts for over one-third of the total municipal waste (in the Pelagonia and Southwest regions this amount of this type of waste exceeds 50%). To meet the recycling targets, it is necessary to establish separate collection and adequate treatment infrastructure in all eight regions, Considering both the environmental consequences of not being treated and the potential for obtaining raw materials or energy. Service providers will have to provide minimal services for the collection and access of special containers, as well as transport to transshipment stations or regional landfills, with the aim of establishing anaerobic digestion systems for biogas production by 2030. The plan also envisages the possibility of **interregional cooperation through joint installations**, which would significantly reduce costs. Raising public awareness through national and regional campaigns also plays a key role.

Inter-municipal cooperation in the regional approach fits naturally and functionally into biodegradable waste management, as it allows municipalities to pool capacities, costs and expertise to establish a more efficient and sustainable system. Given that each municipality generates limited amounts of bio-waste on its own, the joint planning and organization of collection, transshipment and treatment – including the development of common transshipment stations or anaerobic digestion plants – allows for economies of scale, standardized services and significant cost reductions. Additionally, joint information and education campaigns are more effective and cost-effective, providing a unified message to citizens. Finally, such cooperation is also a natural step towards interregional coordination, especially when considering the establishment of joint regional or interregional installations, which is a key prerequisite for successful treatment of biodegradable waste.

### 3.2.5. CONSTRUCTION WASTE, DEMOLITION AND EXCAVATION

**The management of waste from construction, demolition and excavation** is a key priority due to the large quantities generated and the significant potential for reuse and recycling. The system faces insufficient and inconsistent data, which makes it difficult to plan, monitor results and measure the achievement of targets. Due to the lack of private investment and frequent illegal dumping, it is necessary to enter this waste stream into a formal system with clear obligations. sorting and recycling, as well as more active involvement of the private sector, while municipalities remain responsible for the organized collection and treatment of construction waste.

In the case of construction waste, inter-municipal cooperation can contribute to the economically sustainable establishment of common collection, sorting and recycling centres, the use of shared infrastructure, and coordinated inspection mechanisms to prevent wild landfills. This approach would help them municipalities to reduce costs, ensure standard quality of services, consistent data and create conditions for greater participation of the private sector in waste treatment.

According to the analyses resulting from the activities of the SALAR project, 87% in the Southwest and 77% of the shot or construction waste in the Pelagonia region is disposed of improperly.

### 3.2.6. HAZARDOUS WASTE

Hazardous waste **management** remains one of the weakest segments of the waste management system, due to the lack of a national solution and limited local resources, among other things. There is no landfill for hazardous waste in the country. Although the legal framework prohibits the mixing of hazardous waste with non-hazardous waste, some industrial hazardous waste is still stored or disposed of in non-standard municipal landfills due to lack of adequate national infrastructure and high costs of prescribed handling. Household hazardous waste further complicates the system, as municipalities are obliged through the RPWM to provide functional collection centres that have capacity, equipment and standards for its safe separation and temporary storage.

Municipalities can establish regional collection centers with appropriate equipment and trained personnel, as well as organize the safe storage, transport and delivery of waste to licensed operators. Common protocols and systematic monitoring of data on quantities and types of hazardous waste create a more stable and harmonized system, which reduces the risk to the environment and public health.

### 3.2.7. LANDFILLS

Landfill management continues to face serious challenges, as waste is often disposed of in municipal landfills that do not meet the requirements of the EU Landfill Directive and national legislation. These sites are active but are planned for closure and rehabilitation, and the only landfill with an A-integrated environmental permit is Drisla. Therefore, a gradual transition is necessary that includes the identification and closure of uncontrolled landfills, the use of temporary municipal sites while regional sanitary landfills are being built, and finally, the complete remediation of all non-standard landfills. This phased approach is already underway in some regions through the support of the IPA programme, but requires a coordinated effort by all regions to establish a secure and harmonized system solution. At the time of writing this analysis, funds from EBRD loans and donor funds such as SDC and Sida are additionally used.

Given the state of landfills in the country, the transition to an integrated regional system requires a gradual and well-coordinated approach. The identified 54 municipal landfills and their risk classification form the basis for regional transition planning, but an additional challenge is the numerous small, dispersed wild landfills that appear around settlements (a total of 196 in both regions according to the draft strategy), which increases the complexity of management and requires coordinated efforts by municipalities.

According to the list of priorities of non-standard landfills, 6 landfills with high, 3 medium and 6 landfills with low environmental risk have been identified within the Pelagonia and South-West Planning Regions.

Municipalities in the region can jointly develop a regional operational plan that integrates the identified non-standard landfills according to the risk assessment, as well as small dispersed wild landfills, with the definition of common priorities, dynamics and financing of remediation. A common system for the relocation of waste from small and medium-sized sites to new regional landfills can also be organized through the IMC.  with rational use of equipment, shared transport services and optimised routes.

In the law enforcement area, municipalities may establish a joint inspection unit to conduct coordinated surveillance of illegal sites, conduct regular field checks, and provide harmonized sanctioning.

A regional system for the collection, validation and exchange of data on landfills, waste quantities and transition phases can also be established through the IMC, which will allow for better reporting to the state, better planning and compliance with the Landfill Directive.

### 3.2.8. PUBLIC AWARENESS RAISING PROGRAM

**The Public Awareness Raising Programme** aims to inform and engage the public about the importance, effects and benefits of a sustainable waste management system as a prerequisite for the transition to a circular economy. In all chapters of the Plan relating to the segments of regional waste management, raising public awareness appears as a dominant and necessary component for the successful implementation of the measures. municipalities, which currently IMCtly rely on external factors such as NGOs, the private sector or academia.

The successful implementation of more complex measures – such as the regional approach, primary selection or mandatory composting –

It requires early and substantive involvement of the parties concerned, and it is necessary to understand their interests and concerns at the stage of programme preparation. In this regard, inter-municipal cooperation can contribute significantly through coordinated joint campaigns, coordinated messaging and resource sharing, which increases the reach and effect of public communication.

### 3.2.9. SPECIAL WASTE STREAM MANAGEMENT PROGRAMS

In addition to the Public Awareness Programme, the Plan also contains **three national programmes for the management of special waste streams** – the Packaging Waste Programme, the Waste Batteries and Accumulators Programme, and the Waste Electrical and Electronic Equipment Programme. All three programmes are aimed at achieving national objectives and cover measures to improve collection, processing, recycling and reuse systems, with particular emphasis on the need for more intensive cooperation with local governments and other actors.

In all programs, the common goal is to establish an **accessible and functional infrastructure for separate collection**, which must be present in each municipality. In the case of packaging waste, this is reflected through the placement of containers for different materials, combined collection systems and the establishment of regional sorting centers. In the case of waste electrical and electronic equipment (WEEE), emphasis is placed on a wide network of collection points, Including shops, supermarkets and recycling centres, while in the case of waste batteries and accumulators, the focus is on specially labeled containers in locations that are accessible to citizens on a daily basis. Municipalities have an active role in securing the space and organization of systems, while producers and collective contractors need to provide the necessary technical infrastructure.

All three programmes place strong emphasis on the need to **improve reuse**, **recycling** and **recycling**, by promoting awareness, supporting the development of new technologies, and preparing guidelines, standards and codes of practice.

**The role of administration** is similarly defined across all streams – coordinating, supporting initiatives, exploring operational models, and providing a normative framework that will improve the efficiency of systems.

As a common thread across all programs, the **need for more intensive cooperation and coordinated work with local self-government** and other actors is highlighted, as well as constant raising public awareness of the importance of separate collection. At the same time, the support of municipalities – as the primary place where waste is generated and collected – is a key condition for the effectiveness of all measures, which further underlines the importance of a regional approach and inter-municipal coordination in the implementation of the Plan.

Inter-municipal cooperation can significantly contribute to the realisation of programmes for special waste streams through pooling of resources, coordinated planning and joint use of infrastructure that individual municipalities cannot provide on their own. Through common regional sorting centers, unified collection systems, coordinated information campaigns, and joint establishment of meeting places, municipalities can achieve greater efficiency, lower costs, and better service coverage. The IMC also allows for the sharing of technical knowledge, human resources and logistical capacities, which is particularly important for municipalities with limited opportunities.

## 1. Conclusion of the analysis of the Waste Management Plan 2021-2031

The analysis of the Waste Management Plan 2021–2031 shows that the national policy is clearly aimed at establishing an integrated, regionally organised system that should ensure sustainable, efficient and European-harmonized waste management. The plan treats the regional approach as a fundamental pillar of reform, but additionally recommends an interregional approach in cases where waste quantities, economies of scale, or technical requirements make it more efficient for several regions to share infrastructure, capacities, and services. This suggests that successful waste management requires multi-layered coordination – at local, regional and interregional levels – thereby minimizing fragmentation and optimizing investments in expensive treatment and recycling infrastructure.

In this multi-level architecture, inter-community cooperation stands out as an important supportive mechanism. Although the Plan does not explicitly recognize the Law on Inter-Municipal Cooperation, the analysis shows that the IMC can enhance the operational functionality of the system, especially during the transition period as organizational units establish and develop their human and administrative capacities. Through joint logistics solutions, data collection, equipment use, management of collection centers, organizing public campaigns or coordinating inspection activities, municipalities can overcome constraints arising from small territories, insufficient equipment and finances, or lack of human resources.

The analysis also reveals that the system faces significant weaknesses in the data patch – incomplete, inconsistent or differently collected data that make it difficult to plan, monitor and report. The organisational unit has a central role in establishing regional databases and reporting systems, but in practice, in periods when these structures are not yet fully functional, inter-municipal cooperation can provide common methodologies, uniform forms, coordinated field checks and timely exchange of information. This creates a solid basis for regional planning and for the fulfilment of obligations to the central government.

The need for public campaigns is recognised as a critical prerequisite in all segments of the Plan – both in primary selection, in biodegradable waste, and in specific streams. Given that many municipalities do not have the capacity to independently develop effective communication programmes, in addition to the support of the institutions of the central governments, inter-municipal cooperation makes it possible to create the basis for joint campaigns with greater coverage, coordinated messaging and lower costs that take into account the local context and the needs of the population. This approach is consistent with the later role of organizational units, who will need to consolidate these activities at the regional level, but in the initial stages the IMC can provide the necessary pace and scope.

The lack of inspection capacity at the local level is one of the IMCt significant challenges identified in the Plan. The creation of joint inspection services through inter-municipal cooperation emerges as a rational and quick solution to overcome restrictions. Such services would provide uniform standards, greater coverage on the ground, coordinated oversight of wild landfills, waste collection, special streams, and compliance with legal obligations.

In terms of institutional set-up, the analysis makes a clear distinction between the long-term role of the Organizational Unit and the supportive role of the IMC. The organizational unit is the systemic center of the regional model, with the obligation to prepare regional plans, manage infrastructure, coordinate investments, ensure regulatory compliance, manage data, and prepare annual programs and reports. These functions by their very nature must be housed within a clearly defined regional institution. At the same time, the analysis suggests that before an organizational unit becomes fully functional, it is necessary to conduct a detailed functional analysis. That analysis will make it possible to clearly determine which functions must be provided from the outset within the organisational unit – such as planning, monitoring, operator selection, regional data and regulatory obligations – and which functions can be provisionally or partially implemented through inter-municipal cooperation. Functional analysis will create a structure for the incremental build-up of the unit, identifying required personnel,

operational procedures, and technical resources, while the IMC will allow for the continuous implementation of some of the tasks during the transition period.

The conclusion of the analysis is that the reform set out in the Plan is ambitious, necessary and systematically correct, but its success will depend on the pace at which the organizational units will be established and on the willingness of the municipalities to take advantage of the opportunities of intermunicipal and interregional cooperation. The IMC can be a significant support mechanism to ensure continuity, reduce costs and strengthen capacities while regional structures are established and consolidated. Thus, the IMC does not replace the regional model, but complements and makes its implementation more sustainable, more efficient and more predictable.

# 4. ANALYSIS OF THE OPERATIONAL REGIONAL WASTE MANAGEMENT PLAN FOR THE PELAGONIA AND SOUTHWEST REGIONS

This part of the analysis includes an analysis of the Operational Regional Waste Management Plan for the Pelagonia and Southwest Regions, which is in fact a concise and practical planning document with clearly set goals and activities that can be closely monitored to meet the requirements of the Regional Waste Management System (RWMS). merging the implementation of the RPU into a single functional and operational document reflecting the reality of establishing a **single waste management region**. The waste management region includes 18 municipalities from the two planning regions with a total population of 387,829.

In addition to the Operational Plan, this analysis also uses the findings of **the Capacity Assessment of the six pilot municipalities** in the South-West and Pelagonia Planning Regions, which further clarify the situation and provide a more specific basis for finding solutions through the establishment of inter-municipal cooperation. Also, for certain challenges and recommendations identified in the Assessment, solutions are offered through inter-municipal cooperation.

As stated in the operational plan, achieving goals is not a mission for one individual or organization – it must be a collective endeavor that requires partnerships, collaboration, and motivation of the entire population and institutions in both regions. Hence, the analysis of this document focuses largely on **institutional collaboration** which should be systematic in close coordination at all levels of local government and regional waste management mechanisms. Of course, one section will also look at the opportunities offered by inter-community cooperation to engage and communicate with relevant stakeholders at the local level.

**The Operational Plan recognizes the potential that inter-municipal cooperation has**, in particular, to generate economies of scale and reduce financial costs in waste management.

Even the elaboration of this operational plan itself represents a form of informal cooperation between the municipalities involved. Informal in the sense that it does not require the formal establishment of a contractual or institutional form of cooperation under law, and decisions of the councils of the municipalities, but the joint commitment and participation of the relevant local actors in the process of preparing this regional document with donor assistance.

In **the vision of the plan**, in the direction of achieving sustainable effective waste management, the need for mutual **cooperation** is emphasized, which in turn also contributes to strengthened administration capacities and improved infrastructure.

The plan outlines six **priorities** that outline areas of intervention and the expected results of municipal waste management efforts over a three-year period.

The analysis of the operational plan will focus on the opportunities offered by the Law on Inter-Municipal Cooperation, which can further contribute to the fulfilment of priorities. However, in the context of mandatory inter-municipal cooperation regulated by a special law that provides for institutional forms of cooperation and support in waste management, especially taking into account the place and role of the organizational unit for regional waste management as a joint administrative body, it is important to point out that in addition to this solution, municipalities have at their disposal additional opportunities for formal and informal cooperation. Formal forms of cooperation are governed by the Law on Intermunicipal Cooperation.

But first of all, it is worth reviewing the work carried out by the Regional Waste Management Organisational Unit in coordination with the municipalities. In addition to the preparation of the regional plan, its monitoring and reporting, the unit prepares, proposes, implements and manages

projects and other activities for the implementation of the regional plan, as well as other projects of interest for the development of the regional system. It also provides contractual services and waste management facilities in the regional system.

The following section of the text will indicate the IMCt appropriate forms of cooperation that municipalities can establish under the Law on Intermunicipal Cooperation through decisions of the involved councils of partner municipalities. Some of the activities that would be implemented through formal forms of cooperation could potentially be realized through the Regional Waste Management Organisational Unit in the form of projects and contract services. However, the final decision on the manner of carrying out certain activities remains with the members of the Inter-Municipal Waste Management Board, i.e. mayors and municipal councils.

The implementation of the regional plans is financed by funds provided from the budgets of the organizational units for regional waste management, municipalities and the city of Skopje, loans, donations, fees, fines for violations imposed on the territory of the municipalities and the city of Skopje and other sources of funds, determined by law. If certain activities of the plan are implemented through formal forms of inter-municipal cooperation, then within the framework of them, financing mechanisms agreed between partner municipalities should be provided.

In general, a large part of the options offered for the IMC in implementing the priorities given below in the text can be **encouraged and coordinated by the Regional Waste Management Organisational Unit** . However, the limited capacities of this unit may not always adequately respond to the needs of joint contracting and enforcement of the competence, hence the need to use additional formal forms of cooperation defined in the IMC Act, but also forms of an informal nature.

## 4.1. PRIORITY 1: PROVIDING SERVICES (COLLECTION AND TRANSPORTATION OF WASTE) TO AS MANY USERS AS POSSIBLE

Aim:

1. **Improved waste collection and transportation through planning**

| **Actions:** | **Forms of inter-municipal cooperation** |
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| ▪ Mapping barriers that prevent easy access to users, including vulnerable groups.<br>▪ Analysis of collection routes and vehicles needed, including types and number of containers/bins<br>▪ Analysis of the Required Number and Size of Collection Centers for Certain Types of Waste<br>▪ Exploring ways to leverage inter-community collaboration to increase service coverage | Given that the first priority is envisaged to be achieved through planning activities and analysis, the IMCt appropriate forms of inter-municipal cooperation are the formation **of an occasional joint working body or commission** (Article 10), which may be composed of representatives of municipal administrations and utility companies, but which can often be composed of experts from the field who provide expert support in the work. Structure for the exchange of experience and professional cooperation between municipal administrations, which is necessary in the mapping of obstacles, analysis of routes and planning of meeting centers.<br>If the municipal administration and/or the public enterprise administration have the capacity to carry out the analysis independently, an appropriate form is a joint working body that will be responsible for coordinating activities, mapping and producing reports. Otherwise, partner municipalities will need to consider hiring outside expertise through an asset pooling agreement.<br><br>In the part where the operational plan provides for research with increased scope, inter-municipal cooperation may also be applied by using the form of **pooling financial, material and other means for the implementation of joint projects** in the exercise of its competences. This form, according to Article 30, is particularly useful if municipalities wish to finance joint studies, mappings or technical elaborations by engaging external expertise, At the same time, they are not yet ready to establish larger institutional models such as the formation of joint administrative bodies.<br><br>An agreement is concluded between the mayors of the municipalities who pool financial, material and other resources after prior decisions of the councils of the municipalities. |
| ▪ Develop and deliver employee education programs on appropriate organizational processes and data management | When it comes to the development and delivery of educational programs for employees in municipal administrations responsible for waste management or for employees of public enterprises, the following solutions are possible:<br>▪ Engage external experts that can be co-financed by interested municipalities through **a pooling agreement**.<br>▪ If sustainability in human resources management in the long term is considered, including the function of training and development of personnel, an appropriate form of inter-municipal cooperation that can be carried out is a **joint administrative body** (Article 11). Joint department (or department) for human resources management systematized in acts of internal organization [v] to one of the partner municipalities can deliver services to all municipalities not only in the part of planning and providing training and development, but also in other functions such as recruitment and retention of staff, as well as evaluation of the performance of staff for the proper functioning of the regional waste management system. |

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| | If in one of the municipalities of the region there is a developed system and capacities for human resources management, then as an alternative to the previous form, that organizational unit (department or sector) can deliver training and development services to the other partner municipalities through the form of cooperation - **the performance of certain works within the competence of the municipalities by one municipality at the expense of one or more other municipalities**, By concluding an agreement between the mayors and decisions of the councils.<br><br>Both forms of cooperation as solutions implemented within the framework of inter-municipal cooperation can contribute significantly to the development and implementation of a capacity development program focused on topics ranging from waste management, in order to bridge existing gaps in knowledge and expertise among municipal staff, which is one of the recommendations in the The assessment of the capacities of the six pilot municipalities in the South-West and Pelagonian planning regions (Area VI: Knowledge, Expertise and Innovation).<br>Also, the development and implementation of a **learning platform for municipal staff** working on waste management, as well as **for employees of public utilities**, on a continuous basis, is potentially feasible within a joint human resource management department or by forming a joint working body that will design the learning platform and on that basis in the longer term, Engage external expertise financially supported by all municipalities through a pooling agreement.<br><br>The shared learning platform would serve to develop and implement a capacity development program focused on waste management topics, both for municipal and public utility administration. |
| **Aim:**<br>2. **Increased fleet and number of bins/containers** | |
| **Actions:** | **Forms of inter-municipal cooperation** |
| ▪ Identifying funding sources and effective financial planning | To identify sources of funding, the establishment of a temporary or permanent joint working body **is applicable.**<br>Inter-municipal cooperation is particularly important in seeking and securing additional funding from sources such as IPA and other bilateral donors to supplement municipal budgets and increase financial resources for waste management initiatives, in a coordinated manner and in accordance with the RPU and LAP (Capacity Assessment, Area VII – Resource Allocation). enterprises, so the joint engagement of external expertise through the **pooling** |

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| | **of financial, material and other assets** is certainly a possible solution to this situation.<br><br>Effective financial planning can also be achieved through the collaboration of the professional services responsible for waste and the organizational units for finance and budget within the framework of **a permanent joint commission** established as a body of mayors from the partner municipalities. The commission would meet at certain times of the year, especially before the preparation of municipal budgets and in direct cooperation with the Organizational Unit for Regional Waste Management and would propose solutions related to tariffs and their collection, as well as the allocation of funds on a multi-year basis to ensure consistent financial support and long-term planning. |
| ▪ Procurement of vehicles and bins/containers | When the plan envisages an increase in the fleet, the purchase of trucks, containers, the appropriate form is the **pooling of financial, material and other assets** or, in the case of more advanced integration, of course, the establishment **of a joint public enterprise**.<br><br>However, as a preparatory stage of procurement is the development of a comprehensive plan for resource management and maintenance of vehicles and equipment to ensure optimal functionality and longevity. Also, conduct a thorough analysis of the need for additional containers or bins to collect various types of waste, including bio-waste and plastics. (Capacity Assessment, Area VIII. Infrastructure and Equipment). These analyses and planning could potentially be realized either through **joint working bodies** or by engaging external expertise financially backed by **pooling financial, material and other assets.**<br><br>The implementation of **group procurement** under the Public Procurement Act[vi] is also an opportunity available to municipalities to obtain better terms and conditions for which they conclude an agreement that can be considered as an additional formal, contractual form of inter-municipal cooperation provided by the Law on Public Procurement. |
| ▪ Providing training for utility employees working in the field | Providing training to utility employees should be an integral part of the inter-community learning platform, so in that sense, the IMC solutions offered above in Objective 1, Action 2 are applicable to this action as well. |

## 4.2. PRIORITY 2: INTRODUCTION OF A WASTE SELECTION SYSTEM AND COLLECTION OF SEPARATE WASTE STREAMS

| Aim:<br>1. **Identified quantities of separate waste streams generated in the municipality** | |
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| **Actions:** | **Forms of inter-municipal cooperation** |
| ▪ Preparation of a list of special waste streams generated on the territory of the municipality | This activity represents the first step in the establishment of a system for the management of special waste streams, which should provide a clear picture of what types of waste are generated on the territory of the municipality, in what quantities, and in which |

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| | sectors. For the implementation of this activity through the IMC, **a joint working group or commission** would be an appropriate formof partner municipalities. The reason is that the collection of data and the elaboration of a unified list in the region require a uniform methodology, harmonized criteria, as well as technical expertise if it exists within the framework of municipal administrations and the administration of public utilities.<br><br>The hiring of experts who will collect data on the ground for all municipalities and prepare a standardized report can be realized by **pooling financial, material and other resources** in the form of an IMC.<br>But the Regional Waste Management Organisational Unit can also engage experts who will collect data on the ground for all municipalities and prepare a standardised report.<br><br>A collaborative approach to the implementation of this action from the operational plan will provide a more complete **picture of regional waste flows**, which is essential for the next stages of planning. |
| ▪ Analysis to determine specific waste flows and methods of treatment | This activity builds on the previous one and aims to determine **the nature and treatment of the identified waste streams** .<br>For this action, the IMCt appropriate **is an agreement on pooling financial and material resources**, with the aim of jointly financing the preparation of a technical study or analysis by a professional institution/persons. By pooling funds, the municipalities will receive a joint regional analysis. |
| **Aim:**<br>2. **Creating a Friendly/Conducive Environment for Waste Selection** | |
| **Actions:** | **Forms of inter-municipal cooperation** |
| ▪ Analysis of the Recycling Materials Market<br>▪ Waste Selection Cost Analysis | As previously presented, temporary or permanent working bodies and commissions **are IMCt appropriate for conducting analyses** if municipalities have internal capacities.<br>Also, the form that provides for **the pooling of financial, material and other assets** can be used when engaging external expertise for the given analysis. |
| ▪ Mobilizing support for the introduction of a waste selection system<br>▪ Raising public awareness and motivating the population about the benefits of waste selection | In order to raise public awareness and motivate the population to actively participate in waste selection, one of the possible variants for inter-municipal cooperation is the involvement of civil society organizations that have the capacity to organize promotional and educational campaigns. In addition, partner municipalities can **pool funds to cover the costs of the campaign**, intended for a civic organization from the region or even to hire a commercial agency to plan and organize public awareness campaigns.<br><br>Establishing partnerships with local civic organizations and community groups leads to increased reach and impact of public awareness initiatives. |

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| | An engaged civic organization, through the IMC, can develop a comprehensive, multi-year strategy/program aimed at raising public awareness and educating both students and citizens about waste management in the region. Through a joint approach and activities with the municipal administration and utility companies, an educational program on waste management can be developed and implemented aimed at building the capacity of teachers in primary schools and raising awareness among students. (Capacity Assessment, Area X. Public Awareness and Education). |
| **Aim:**<br>3. Provision of facilities and equipment for waste selection | |
| **Actions:** | **Forms of inter-municipal cooperation** |
| ▪ Identify funding o pportunities and ensure effective financial management | See: Priority 1/Goal 2/Action 1<br><br>Forms of the IMC:<br>1. Establishment of a temporary or permanent joint working body<br>2. The Pooling of Financial, Material and Other Assets<br>3. Formation of a permanent joint commission |
| ▪ Identifying locations for waste selection facilities<br>▪ Identifying and securing waste buyers | Identifying locations for waste selection facilities is typical work that can be accomplished within an **occasional task force or working body** as a form of collaboration between municipalities. Using the same instructions, site selection will have a unified approach and solutions across the region.<br>Identification and securing of waste buyers can be organized in a similar way. |
| ▪ Construction of temporary warehouses for recyclable materials<br>▪ Construction of Waste Selection Islands<br>▪ Procurement of waste baling machines<br>▪ Procurement of containers, bins and waste collection vehicles | For craft and construction work, as well as the procurement of equipment and vehicles, the forms described in Priority 1, Objective 2, Action 2 may be used.<br>Forms of the IMC:<br>▪ Pooling financial, material and other assets in engaging external services and purchasing machinery<br>▪ Conducting a Group Procurement for the Procurement of Machinery<br><br>Also, in the context of the developed capacities of one of the communal enterprises in the region, its resources can be offered in the provision of craft and construction works for other municipalities. In that case, an appropriate form of inter-municipal cooperation would be **the performance of certain works by one municipality for one or more other municipalities.** |
| ▪ Design and implementation of pilot projects for waste selection | Waste selection pilot projects could be designed by a **joint working body** that would decide in which municipalities and in which locations waste selection would be tested. The working body would be responsible for designing the overall pilot project together with the municipal PUCs in charge of household waste collection.<br><br>If municipalities do not have adequate facilities, the previous work can be entrusted to external experts, and finances secured through the **pooling of financial, material and other resources**.<br>In certain cases, the pilot project may also be carried out by a public utility company from the region that has adequate facilities by concluding a contract for the **performance of certain works by one municipality for one or more other municipalities.** |

## 4.3. PRIORITY 3: REDUCE THE AMOUNT OF ORGANIC WASTE ENDING UP IN LANDFILL

| **Aim:**<br>1. **Creating a Safe Environment for Organic Waste Selection** | |
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| **Actoins:** | **Forms of inter-municipal cooperation** |
| ▪ Analysis of Quantities and Models of Organic Waste<br>▪ Cost-Effectiveness and Benefits Analysis for Organic Waste Selection and Treatment | To carry out analyses ofthe quantities and models of organic waste in an appropriate form of cooperation is an **agreement to pool financial and material resources**, since the analysis involves field data collection and, eventually, the hiring of experts for measurement and evaluation. Through the joint financing of such an analysis, municipalities can obtain a complete regional picture of the generation of organic waste, which will serve as a common basis for the future design of composting plants or other treatments.<br>This model of cooperation allows for economies of scale (one methodology, one engagement of experts) and at the same time allows for the preparation of a harmonized data system that will be consistent with national reporting and statistics requirements.<br>Based on the previous analysis, a cost-benefit analysis should be drawn up for the selection and treatment of organic waste, which may form part of an asset pooling agreement and part of an agreement to engage external expertise. |
| ▪ Mobilizing support for the introduction of organic waste selection<br>▪ Raising Public Awareness of Organic Waste Selection | See: Priority 2/Goal 2/Action 2<br><br>Forms of the IMC:<br>Involving civil society organizations that have the capacity to organize promotional and educational campaigns by **pooling funds** to cover the costs of the campaign. |
| **Aim:**<br>2. **Composting plants are built and operational** | |
| **Actions:** | **Forms of inter-municipal cooperation** |
| ▪ Introduction of Inter-Municipal Cooperation on Organic Waste Management | The introduction of inter-municipal cooperation on the management of organic waste should be based on a previously conducted assessment of the need to establish an IMC, which is usually made **by a joint commission**. On the basis of the conducted Cost-Effectiveness and Benefits Analysis for the Selection and Treatment of Organic Waste, among other aspects of cooperation, in assessing the need for the establishment of the IMC, It is also necessary to define the forms of inter-municipal cooperation that will contribute to the establishment of an organic waste treatment system.<br><br>As of its current state, Prilep, for example, is already working on the construction of a composter plant that can be seen as a potential for cooperation with other surrounding municipalities. |
| ▪ Identification of locations for composting plants<br>▪ Preparation of appropriate technical and urban planning documentation | In the process of identifying locations for composting plants and further preparing appropriate technical and urban planning documentation, it is necessary to form a joint working body or committee.<br><br>Given the technical and financial complexity in the implementation of these two actions, a possible form of cooperation is the formation |

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| | of a joint working body or commission with a mandate to coordinate the identification of locations for composting plants and the preparation of technical and urban planning, as well as to be the bearer of the project before the competent authorities. The inclusion of representatives from urban planning departments in the joint working body is inevitable.<br><br>Once the appropriate locations have been identified, the next step is to prepare the necessary technical and urban documentation for the construction of composting plants. The aim is to ensure compliance with the legal framework, technical standards and spatial plans. The process of preparing the technical and urban documentation itself can be carried out by engaging external expertise through pooling of funds, and under the coordination of a joint working body or commission. |
| ▪ Identifying and providing funding for plant construction | See: Priority 1/Goal 2/Action 1<br><br>Forms of the IMC:<br>▪ Establishment of a temporary or permanent joint working body<br>▪ The Pooling of Financial, Material and Other Assets<br>▪ Formation of a permanent joint commission |
| ▪ Construction of composting plants and putting them into operation | For the construction and especially management of a composting plant should be considered towards **an institutionalized model of cooperation,** i.e. a joint public enterprise. This function can also be incorporated into an existing joint public enterprise or, if one of the utilities has the capacity to deliver this service to other municipalities, an agreement between municipalities through the form of a joint venture can also be consideredthe performance of certain works by one municipality for one or more other municipalities.<br><br>Such an institutionalised approach would ensure legal stability, the possibility of third-party contracts, cost sharing, clear governing bodies and long-term operational viability.<br><br>Of course, the decision on the final solution can also be reached using the capacities of the formed joint working body or commission from previous actions to this goal. |
| **Aim:**<br>3. **Introduction of a system for the selection, collection and transportation of organic waste** | |
| **Actions:** | **Forms of inter-municipal cooperation** |
| ▪ Providing an organic waste collection service<br>▪ Design and implementation of pilot projects for organic waste selection | Pilot projects for the selection of organic waste could be designed by a joint working body that would decide in which municipalities and in which locations the waste selection would be tested. The working body would be responsible for designing the overall pilot project taking into account existing capacities and of course political support, but it is IMCt appropriate to go gradually with the inclusion of municipalities that are ready for a further expandable IMC.<br><br>If municipalities do not have adequate facilities, these works can be entrusted to external experts, and finances secured through the pooling of financial, material and other resources. |

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| | In the event that the pilot project is carried out by a joint public utility company from the region that has adequate facilities, then the relationship would be regulated by concluding an agreement for **the performance of certain works by one municipality for one or more other municipalities.** |
| ▪ Provision of containers, bins and vehicles for the collection of organic waste | See: Priority 1/Goal 2/Action 2<br>Forms of the IMC:<br>▪ In the preparatory stage of procurement – joint working bodies or by engaging external expertise financially supported by pooling financial, material and other assets.<br>▪ In the process of procurement, pooling of financial, material and other assets or, in the case of more advanced integration, certainly through a joint public enterprise.<br>▪ Implementing Group Procurement |

## 4.4. PRIORITY 4: CONSTRUCTION OF A LANDFILL ACCORDING TO EU STANDARDS

| **Aim:**<br>1. **Municipalities in both regions are ready for the RSWM** | |
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| **Actions:** | **Облици на меѓуопштинска соработка** |
| ▪ Develop a study that identifies changes (operational, financial, organizational...) in municipal waste management practices as a result of the RSWM and the regional landfill.<br>▪ Fulfillment of the necessary conditions for the construction of loading stations (determination of location, inclusion in urban plans...) | The implementation of this action of the operational plan falls within the legal **competence of the Regional Waste Management Organizational Unit**. Namely, it is competent to prepare and implement procedures for the selection of the regional system operator and propose the selection of the regional system operator.<br><br>However, in support of the unit's capacities, up to its full staffing, the development of the study can also be carried out by engaging external expertise through **pooling of resources**, the coordination of which can be supported **by a joint temporary regional working group** (body).<br><br>This approach can also be used to meet the requirements for the construction of transshipment stations, and for the IMCt part through a **joint occasional regional working group**. |
| **Aim:**<br>2. **Established Regional Utility Company** | |
| **Actions:** | **Forms of inter-municipal cooperation** |
| ▪ Defining the Initiative Holder<br>▪ Signing of an Inter-Municipal Cooperation Agreement<br>▪ Choosing a management structure | If a public utility company is established, then the Law on Intermunicipal Cooperation from Articles 18 to 23 elaborates in more detail the procedure for establishing **a joint public utility company**. Also, the details of the establishment of a public company are defined in the Law on Public Enterprises[vii]<br>In direct communication and coordination between the mayors, it should be decided who will be the bearer of the initiative to establish the joint regional enterprise. The overall procedure for establishing inter-municipal cooperation to be initiated by the initiative holder (mayor, council or citizens) is defined in Articles 4 to 8 of the LIMC. |

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| | At the stage of incorporation, for a joint public enterprise, the mayors of the municipalities conclude and<br>They sign an agreement regulating each other's rights and obligations. A joint public enterprise is established by a decision taken by the councils of the municipalities in the same text, by a majority of votes of the total number of members of the council of each municipality.<br><br>The decision to establish a joint public enterprise specifically determines:<br>▪ activity,<br>▪ the company and its headquarters,<br>▪ the amount of funds to be established and the manner in which they are provided,<br>▪ the organization of the joint public enterprise,<br>▪ the manner of implementing the decisions of the bodies of the joint public enterprise,<br>▪ the liability of the joint public enterprise for its obligations in legal transactions with third parties,<br>▪ the deadline for the enactment of the statute and the appointment of the bodies of the joint public enterprise,<br>▪ the appointment of a person who will manage the affairs of the company until its constitution,<br>▪ the number, composition and manner of election of the members of the Board of Directors,<br>▪ the manner in which the director of the joint public enterprise is elected, and<br>▪ The composition and manner of election of the Supervisory Board.<br><br>The determination of the details of the decision to establish a joint venture can be entrusted to **a joint working group** which will also be responsible for preparing a legally binding assessment of the need to establish inter-municipal cooperation through this form (Article 6, LIMC).<br><br>The initiative of the Municipality of Novaci to establish an IMC for the formation of a joint public enterprise, was accepted by 17 municipalities of the Pelagonia and Southwest region (except the municipality of Debar) during 2025. |

## 4.5. PRIORITY 5: CLOSURE AND REMEDIATION OF LANDFILLS

| **Aim:**<br>1. Municipal plans for closure and rehabilitation have been drawn up | |
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| **Actions:** | **Forms of inter-municipal cooperation** |
| 1. Mapping of municipal landfills<br>2. Development of a priority list of landfills and estimation of the costs of activities | Mapping and development of a priority list of municipal landfills as the first step in the process of their closure and rehabilitation can be realized through the formation **of an occasional joint working body or commission**, which may be composed of representatives of municipal administrations and municipal enterprises. |

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| | A more appropriate form of analysis is to carry out the analysis if the capacities of the municipal administration and/or the administration of the public enterprise allow it.<br>It is also a structure for the exchange of experience and professional cooperation between municipal administrations, which is necessary in the mapping of municipal landfills, as well as in the development of municipal plans for closure and rehabilitation.<br>Of course, if research is envisaged with an increased scope and the need for significant capacities, inter-municipal cooperation can also be implemented through the use of the form of **pooling financial, material and other means for the implementation of joint projects**. This form is particularly useful if municipalities want to finance joint studies, mappings as well as cost estimates for activities that will result from the analysis carried out.<br>The analyses should also result in the identification of the IMCt appropriate form of inter-municipal cooperation that will be responsible for the implementation of the plan. |
| ▪ **Identification of funds and incorporation of activities into municipal budgets** | See: Priority 1/Goal 2/Action 1<br><br>Forms of the IMC:<br>▪ Establishment of a temporary or permanent joint working body<br>▪ The Pooling of Financial, Material and Other Assets<br>▪ Formation of a permanent joint commission |
| **Aim:**<br>2. Municipal plans for closure and rehabilitation have been reached | |
| **Actions:** | **Forms of inter-municipal cooperation** |
| ▪ Implementation of the plan according to the set priorities | Given the complexity of the process of closure and remediation of landfills, if it is decided to go with inter-municipal cooperation, this operational work can be assigned to **a joint public utility company that should possess the capacity and knowledge to solve such complex tasks.**<br>Or if that's not the case, landfill closure and remediation is a job for a specialized firm that partner municipalities can engage through **pooling funding** as a form of inter-municipal collaboration. |
| ▪ Monitoring and evaluation of activities | This action aims to establish a systematic process to monitor the implementation of the plans in order to ensure that all measures are implemented in accordance with national regulations and environmental protection standards.<br><br>Monitoring and evaluation involves regularly collecting data, analyzing the results achieved, identifying possible concessions, and proposing corrective measures to improve the process. Hence, this activity may be under the jurisdiction of the **Regional Waste Management Organizational Unit** or otherwise a **joint committee to monitor and evaluate the implementation of the plan**. |
| ▪ Raising public awareness and motivating proper waste disposal so that municipalities are clean and tidy | See: Priority 2/Goal 2/Action 2<br><br>IMC Forms:<br>Involving civil society organizations that have the capacity to organize promotional and educational campaigns by **pooling funds** to cover the costs of the campaign. |

## 4.6. PRIORITY 6: PROVIDE REVENUE THAT FULLY COVERS WASTE MANAGEMENT COSTS

| Aim:<br>1. **An analysis of gaps in waste collections has been carried out** | |
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| **Actions:** | **Forms of inter-municipal cooperation** |
| ▪ Identifying the Revenue and Expenditure Gap of Waste Management Activities<br>▪ Determination of the Waste Fee Collection Rate<br>▪ Establishment of an optimal amount of waste collection fee<br>▪ Identifying Change Management Models<br>▪ Finding new market opportunities for waste | The first goal of this priority is to analyze gaps in waste collections, the consistent and logical steps and issues that the analysis itself needs to cover are translated into actions.<br>Hence, municipalities are offered two opportunities for cooperation, elaborated on several occasions on the previous priorities and actions of the operational plan.<br>Namely, for conducting analyses, a more appropriate form **is a joint working body** that will deal with the conduct of the analysis if the capacities of the municipal administration and/or the administration of the public enterprise allow it. This form also constitutes a structure for the exchange of experience and professional cooperation between municipal administrations, which is necessary in identifying gaps in waste collections, but also in proposing and developing models for change management.<br>If the capacities of the municipalities involved are not sufficient to independently carry out the analysis through a joint working body, then inter-municipal cooperation can be realized through the use of the form of **pooling of financial, material and other means for the implementation of joint projects**. This will put at the disposal of external experts who will recommend the IMCt appropriate models for the optimal amount of the waste collection fee and market opportunities for waste. |
| **Aim:**<br>2. **Implementation of the recommendations of the flaw analysis** | |
| **Actions:** | **Forms of inter-municipal cooperation** |
| ▪ Ensuring political will and mobilizing support for change<br>▪ Increase in waste collection fee<br>▪ Increase in the Waste Fee Collection Rate<br>▪ Implement organizational changes that will ensure efficient and effective waste management<br>▪ Providing additional income from waste trading | The above actions within this objective are IMCtly based on policy decision-making based on data derived from previously conducted analysis.<br>Given the unified approach to the implementation of the regional waste management system and the political nature of this process, there is no doubt that the role of **the Intermunicipal Waste Management Board** would be to exchange experiences that would contribute to making appropriate decisions on increasing the fee for waste collection and ways to increase the collection rate.<br><br>The implementation of organizational changes that will ensure efficient and effective waste management within municipal administrations and public utilities can be followed through the exchange of experiences and improvement of processes through the formation of **a joint working group**. The work of the working group can contribute to the political decision-making of the members of the Intermunicipal Waste Management Board. |
| ▪ Raising public awareness of the importance of paying adequate waste compensation that will ensure the sustainability of the waste management system | Given that several priorities of the operational plan envisage raising public awareness on various issues of regional waste management, the proposed solutions for establishing inter-municipal cooperation can be grouped together and public awareness raising can be assigned to a single provider of that service. As outlined in the operational plan, the service provider should prepare a communication strategy to support the implementation of the plan and to raise citizens' awareness of waste selection and recycling. |

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| | The strategy also assumes identifying target groups and communication channels, identifying and communicating best practices, identifying successes and failures, and discussing expectations and opportunities.<br><br>**Pooling of funds** as a form of inter-municipal cooperation is the basis for the further engagement of a civil society organization or commercial agency for marketing and campaigns (or both) in raising public awareness of the importance of paying adequate waste compensation. |

## 4.7. ANALYSIS OF THE CAPACITY ASSESSMENT OF PILOT MUNICIPALITIES

The analysis of the Capacity Assessment of Pilot Municipalities was used in the previous section, in the context of the priorities of the Operational Plan for Waste Management. However, for some areas that are not explicitly linked to these priorities and therefore have not been addressed in more detail, the challenges and recommendations identified are taken into account in this section, where appropriate forms of inter-community cooperation are proposed to overcome them.

| **Area:**<br>**I. Compliance and Regulation Enforcement** | |
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| **Challenges:** | **Облици на меѓуопштинска соработка** |
| ▪ Municipalities face significant obstacles in implementing waste management legislation due to various deficiencies in organizational structure, finances, knowledge and expertise.<br>▪ Furthermore, municipalities lack effective mechanisms for implementing legislation and aligning local policies with national and EU requirements. | The establishment **of a joint commission** as a form of inter-municipal cooperation is necessary for a systematic review of the legal and policy aspects of waste management, especially in conditions where municipalities face limited administrative capacities, lack of expertise and insufficient mechanisms to comply with national and EU requirements.<br>The Commission will play a key role in proposing acts as well as amending local waste management policies and acts to mayors and councils, ensuring a coherent approach among all involved municipalities in the region.<br>Its work will involve representatives from the departments of environmental protection, utilities and public utilities, as well as legal services necessary to analyze the legal framework and formulate valid proposals. This format of cooperation will contribute to better coordination in the integration of waste management into local development policies, regular updating of action plans, improvement of professional capacities and establishment of a stable communication mechanism with MWSP, regional development centers, inspection services and other relevant factors, thus creating the basis for more effective implementation of the integrated regional waste management system.<br><br>Note: In a fully established system of regional waste management, the functions of this commission should be performed by the organizational unit that prepares proposals for decisions on issues related to the activities and services of waste management, which the Intermunicipal Board proposes to the Council of Municipalities and the Council of the City of Skopje for decision-making on issues related to the activities and services of waste management that are within their competence in accordance with the the Law on Concessions and Public Private Partnership, Public Procurement, as well as other matters related to the development of regional governance and other matters within their jurisdiction. |

| Area:<br>II Organizational capacity and decision-making | |
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| **Challenges:** | **Forms of inter-municipal cooperation** |
| ▪ Municipalities face significant deficiencies in organizational structure, with unclear roles and responsibilities for waste management.<br>▪ Insufficient staff and expertise hamper strategic planning, implementation efforts, and decision-making processes. | The establishment of inter-municipal cooperation through the formation **of a common administrative body**, at the level of a department or sector, is necessary to overcome the pronounced lack of human resources and expertise in waste management, which currently limits the ability of municipalities to strategically plan, implement legal obligations and make informed decisions. This body would bring together a specialized staff – lawyers, engineers and administrative officers – with clearly defined competencies, aligned with the systematization and legal framework, thus establishing a stable and professionalized capacity available to all municipalities involved in the cooperation. The joint body would also serve as a central mechanism for communication with key stakeholders, including citizens, the NGO sector, educational institutions, public utilities and relevant state institutions, allowing for coherent participation in planning and decision-making processes. This would overcome existing organisational weaknesses, ensure consistency in the application of regulations, and create conditions for more efficient and systematic waste management at the local and regional levels. |

| Area:<br>III. Data Management, (Reporting) and Monitoring | |
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| **Challenges:** | **Forms of inter-municipal cooperation** |
| ▪ There are no optimal practices for data collection and monitoring that influence planning and investment decisions in all municipalities.<br>▪ The absence of comprehensive databases on municipal waste, together with inadequate monitoring and evaluation of waste management practices, further exacerbates these challenges. | The establishment of inter-municipal cooperation in the field of data management and monitoring is necessary due to weak data collection, processing and monitoring practices that limit the capacity of municipalities to plan, make investments and comply with legal obligations in a coordinated manner. By creating a common approach, built into the proposed **joint administrative body** Under Area II, municipalities would establish a single and comprehensive system for the regular collection, processing and storage of data on all waste streams, with clearly defined roles and competencies in accordance with national regulation and the requirements of the regional organisational unit. Such a system would allow for consistent reporting, improved data collection in collective bargaining agreements, and the development of mechanisms for monitoring and evaluating the effectiveness of local policies through indicators. At the same time, clear procedures and standards for data exchange with relevant stakeholders – utilities, state institutions, private operators and civil society organizations – would contribute to stable, harmonized and transparent waste management practices, necessary for long-term strategic planning and service improvement. |

| Area:<br>VIII - Infrastructure & Automation | |
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| **Challenges:** | **Forms of inter-municipal cooperation** |
| 1. In some municipalities there is significantly less coverage of waste collection, especially in rural areas and remote settlements, primarily due to poor road infrastructure, low population density and limited cost-effectiveness.<br>▪ Although IMCt municipalities report a sufficient number of waste collection vehicles, much of their fleet is outdated and requires additional waste equipment (bins and containers). | The establishment of inter-municipal cooperation is justified due to the pronounced differences in waste collection coverage, outdated equipment and the lack of technical and financial resources for systematic planning of infrastructure needs. Based on the recommendations of the assessment, part of the activities can be carried out through **the joint administrative body**, which would coordinate the preparation of plans for the management and maintenance of vehicles and equipment, as well as the preparation of harmonized plans for the procurement of new containers, containers and equipment. In addition, municipalities could use the form of collaborative **pooling of funds** to engage external expertise that would produce detailed analyses of the needs for additional infrastructure, service roads, bypasses and technical equipment, taking into account population growth, waste quantities and geographical specifics of rural communities. Such a collaborative approach ensures more comprehensive and cost-effective planning of infrastructure and equipment, Better coordination, rational allocation of resources and more effective addressing of infrastructure challenges in waste management.<br>If one of the municipalities and their PUCs have additional equipment and human resources that can be shared with the other municipalities, then the form of **carrying out certain works by one municipality for one or more other municipalities can also be used.** |

| Area:<br>IX - Inclusion of Affected Parties | |
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| **Challenges:** | **Forms of inter-municipal cooperation** |
| ▪ Although IMCt municipalities recognize the importance of involving stakeholders in the planning and implementation of waste management activities, only a small number actually involve them in these processes.<br>▪ Even in municipalities that have a certain level of inclusion, there is no regular mechanism or established procedure, so engagement is irregular and happens ad-hoc, without continuity and systematic approach. | The need to establish inter-municipal cooperation in the field of actor engagement stems from the lack of systematic and regular processes for their involvement and the limited capacity of municipalities to develop and implement quality participation programmes. Through the proposed **joint administrative body**, municipalities could jointly develop a Plan for active engagement of stakeholders, based on mapping, defining mechanisms for participation and development tailored strategies for different groups. At the same time, the use of the learning platform (formed as inter-municipal cooperation through **pooling of funds** or the **formation of a joint human resources department** - would provide opportunities for capacity-building activities for citizens, the NGO sector, businesses and collective actors. In addition, the inter-municipal mechanisms proposed previously proposed would be used to identify and provide additional sources of funding, through **Establish a joint working group** dedicated to mobilizing funds for initiatives related to the engagement of stakeholders. |

## 4.8. CONCLUSION OF THE ANALYSIS OF THE OPERATIONAL PLAN

The analysis of the six priorities of the Regional Operational Plan for Waste Management shows that **inter-municipal cooperation can be considered as an essential mechanism that can contribute to the effective and sustainable fulfillment of the set objectives**. Moreover, the different forms of the IMC can be applied depending on the nature of the activities – from planning and analytical, through operational and technical, institutional and infrastructure interventions.

Typically, for initial and preparatory activities such as analysis, mapping, studying, and planning, the IMCt appropriate form is the formation of occasional or permanent joint working bodies and committees. These structures allow for coordinated exchange of data and experiences, harmonization of methodologies between municipalities and a common approach in identifying needs and priorities.

When activities require expertise that cannot be provided internally, municipalities may resort to pooling financial, material, and other resources. This form allows for economies of scale, joint engagement of external experts and the production of regional analyses, technical elaborations or feasibility studies, and public campaigns, which is particularly important when establishing systems for the selection, treatment and management of organic waste. In the more advanced stages, when it comes to the realization of construction works, the procurement of equipment, vehicles or the construction of infrastructure, stronger and more institutionalized forms of cooperation are applicable – such as joint public enterprises or contracts in which one municipality performs certain works at the expense of others, as well as pooling funds to conduct group procurement. In this way, the existing capacities of one municipality are used more efficiently for the needs of others.

For activities related to training and human resources development, a common administrative body may be established – a human resources department at the regional level, or one municipality may perform specific tasks for other municipalities. This approach allows for long-term and institutional support for capacity development, as well as the establishment of a systematized training system.

Additionally, when it comes to raising public awareness and building social support, the IMCt appropriate model is to partner with civil society organizations supported through pooling of funds, which allows for wider coverage and long-term educational and communication support.

Activities related to financial planning and fundraising are implemented through the formation of a joint task force or committee for the identification of funds and financial planning, as well as through the pooling of funds for the development of applications and technical documentation. This approach allows for a combination of expertise and financial capacity, resulting in more effective access to domestic and foreign funds, including IPAs and bilateral donor funds.

Given that regional waste management is a mandatory inter-municipal cooperation, the role of both the Inter-Municipal Board and the Waste Management Organisational Unit is essential. In addition, the available forms of inter-community cooperation under the IMC Law can and should be treated as a complementary mechanism in fulfilling their statutory competences.

Ultimately, the analysis of all six priorities suggests that the choice of form of inter-community cooperation is always closely related to the type of activity, the resources needed, and the goals sought to be achieved.

# 5. ANALYSIS OF THE LOCAL ACTION PLANS FOR WASTE MANAGEMENT OF THE 15 MUNICIPALITIES

**The Local Action Plans (LAPs) for Municipal Waste Management 2024-2025 have been developed in order to determine local waste management policies, determine the scope of interventions and set clear targets with detailed steps for their implementation.**

**A regional perspective and an emphasis on inter-municipal cooperation were among the priorities in the drafting of the LAP. The merger of the two regions (Pelagonia and Southwest) into a single waste management region creates an opportunity but also an obligation for close cooperation between municipalities.**

The aim of the analysis is to determine which activities of the local action plans of the 15 municipalities can be implemented through inter-municipal cooperation and thus support the gradual establishment of a regional approach to waste management.

The analysis identifies common priorities, challenges and potential opportunities for joint action between municipalities. To this end, a matrix of activities by municipalities has been developed within each of the priorities. Inter-municipal cooperation can provide a transitional (and in some cases permanent) solution, up to the establishment of a fully functional regional waste management system. The proposed collaborations are indicative and stem from the priorities and objectives of the 15 municipalities, but their final form and implementation depend on a number of factors, such as real needs, capacities and local context. The implementation of each proposed cooperation requires an additional assessment of the need for its formalization, as well as clear support from mayors and municipal councils, which make final decisions on the establishment of cooperation and on the selection of the IMCt appropriate model.

For the purposes of the analysis, the related activities of the action plans are grouped into functional wholes that can be realized as an inter-municipal cooperation.

When choosing the IMCt appropriate model, the common needs and field of interest, the logical connection of the activities, the capacities of the municipalities and the time frame for their implementation are taken into account. Due to the complexity of the institutional changes that overarching models would require, such as the formation of joint administrative bodies (departments and/or sectors) or the establishment of joint public enterprises, the analysis proposes forms of cooperation that do not require organizational restructuring and are achievable within the envisaged time frames. They are based on pooling existing resources through working bodies, commissions or contractual forms for co-financing or service delivery.

Although the analysis is based on the 15 municipalities, the approach and proposed cooperation models are applicable to the entire waste management region covering all 18 municipalities of the two planning regions.

## 5.1. PRIORITY 1 - PROVIDING SERVICES (WASTE COLLECTION AND TRANSPORTATION) TO AS MANY CUSTOMERS AS POSSIBLE

### 1. AREA/GOAL OF COOPERATION: MAPPING BARRIERS TO ACCESS TO USERS AND THE REQUIRED NUMBER AND SIZE OF COLLECTION CENTERS FOR CERTAIN TYPES OF WASTE

| Actions: 1.1.1 и 1.1.3 | |
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| **Municipalities involved:** | **Bitola, Kichevo, Prilep, Debrca, Demir Hisar, Dolneni, Struga, Resen and Vevchani (9)** |
| **A form of cooperation:** | **Joint Working Body**<br><br>Formation of a joint working body of a part-time nature to consider certain issues within the competence of the mayor, i.e. mapping obstacles that limit access of services to customers and determining the number and size of meeting centers. |
| **Legal bases according to the LIMC:** | Article 10 |
| **Modality of Cooperation Implementation:** | Two or more municipalities may form periodic joint working bodies to consider certain matters within the competence of the mayor.<br>Joint working bodies consider issues and initiate decision-making by municipal authorities that are of common interest in the exercise of the municipalities' competences.<br>Joint working bodies are also formed for the exchange of experience and the achievement of professional cooperation of municipal administrations in the exercise of the competences of the municipalities.<br>The mayors of the municipalities involved make a decision on the formation of the joint working body after previous decisions of the municipal councils. The resolution contains the names and functions of the members of the working body involved from the respective municipalities, the purpose, activities and the expected results of its operation. The resolution also specifies the time period of operation of the temporary joint work body.<br><br>*Note:*<br>*The manner in which cooperation is accomplished on specific forms is clearly governed by the legal framework. Hence, in order to avoid repetition of the text, in the further course of the guidelines in those areas of cooperation where the establishment of a joint working body is proposed, the description of the achievement of cooperation will be omitted.* |
| **Composition of the JWB:** | In IMCt municipal LAPs, the public utility company appears as the responsible party for the implementation of the activities, together with the municipal administration responsible for communal activities, environmental protection and inspection supervision, hence, the working group would include representatives of these institutions. |
| **Work done through the IMC:** | ▪ Development of a methodology for mapping barriers that limit access to services for users, including vulnerable groups<br>▪ Updating user data that is difficult to access when using the services<br>▪ Identification and analysis of settlements that are not included in the waste collection system |

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| | ▪ Identification of Natural and Legal Entities Not Covered by the Service<br>▪ Analysis of the types and quantities of waste that can be selected<br>▪ Analysis of the number of technical means and human resources for the provision of the service<br>▪ Preparation of a report with mapped obstacles, reasons and recommendations for overcoming them, as well as recommendations for the optimal number and size of collection centers and types of waste |
| **Time period for the implementation of the envisaged activities under the LAP:** | 12 months |
| **Comment:**<br>If the scope of activities is not possible to realise with the existing capacities of the municipalities involved and their representatives in the WRG, then pooling funds are available to engage external expertise in a form of IMC.<br><br>It is also worth considering the possibility of creating **joint gathering centers** that are obliged under the WMA, whereby smaller municipalities will be able to join the centers formed by larger neighboring municipalities (e.g. Krivogashtani and Dolneni towards Prilep, Plasnitsa towards Kichevo and the like).<br><br>In each of the 15 municipalities, waste management working groups have been formed, but they operate at the level of an individual municipality, therefore, it is necessary to distinguish between the proposed joint working bodies and working groups as forms of cooperation that would be formed between potential partner municipalities in the context of inter-municipal cooperation. | |

## 2. AREA OF COOPERATION: PROVIDING IMPROVED SERVICES TO CUSTOMERS THROUGH ANALYSIS OF COLLECTION ROUTES, TRANSPORTATION, REQUIRED VEHICLES AND EQUIPMENT

| Actions: A 1.1.2 | |
|---|---|
| **Municipalities involved:** | **Bitola, Kichevo, Prilep, Novaci, Plasnitsa, Dolneni, Krivogashtani, Krushevo and Vevchani (9)** |
| **A form of cooperation:** | **Joint Working Body**<br>Formation of a joint working body of an interim nature, to consider certain issues within the competence of the mayor, i.e. analysis of collection and transportation routes, as well as necessary vehicles and equipment for improved waste management services. |
| **Legal bases according to the LIMC:** | Article 10 |
| **Modality of Cooperation Implementation:** | The modalilty of implementatoin of the cooperation is described in Area 1. |
| **Composition of the JWB:** | In IMCt of the LAPs of municipalities, the public utility company appears to be the responsible party for the implementation of the activities, together with the organizational units (department or sector) of the municipal administration for LED, communal activities and environmental protection and inspection supervision, hence, the working group would include representatives of these institutions. In addition, some municipalities need technical and legal support, which means that experts from a given field can be invited to the working group. If their engagement is to be |

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| | financially covered, then the agreement regulating mutual rights and obligations signed between the mayors of the municipalities involved should include this issue. |
| **Work done through the IMC:** | ▪ Development of methodology and rules for determining collection routes, required vehicles and bins<br>▪ Update data to new users<br>▪ Analysis of priority settlements and settlements to be covered by the service<br>▪ Analysis of the types and quantities of waste generated in the municipality<br>▪ Analysis of current routes and current state of technical equipment (number of vehicles, bins and containers, vehicles required)<br>▪ Analysis of the method of collection and transportation of waste and the necessary infrastructure in the municipality area<br>▪ Development of a report and plan for optimization and adaptation of routes for collection of municipal waste, as well as for the needs of special waste collection vehicles and technical equipment. |
| **Time period for the implementation of the envisaged activities under the LAP:** | 9 months |
| **Comment:**<br>Alternative forms of cooperation: if the scope of activities for all municipalities cannot be realised with the existing capacities of the municipalities involved and their representatives in the UGC, then the following forms of IMC are available - **pooling of funds or assignment of tasks to a joint regional PUC**. | |

## 3. AREA OF COOPERATION: DEVELOPING AND DELIVERING EMPLOYEE EDUCATION PROGRAMS RELATED TO ORGANIZATIONAL PROCESSES AND DATA MANAGEMENT

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| LAP activities implemented | Within the framework of the capacity development program, implemented with the support of the SALAR project, training for municipal administration was organized, aimed at improving the skills of monitoring and evaluating the implementation of local action plans for waste management, as well as strengthening strategic communication with the public and relevant stakeholders.<br><br>However, there is still a need for additional and continuous training for employees, which can be more effectively planned and implemented through inter-municipal cooperation, allowing for the sharing of resources and expertise, reducing costs and ensuring a unified approach at the regional level.<br>At the same time, the already acquired knowledge and experience represent significant capital that can be systematically transferred to employees in other municipalities of the region through established forms of inter-municipal cooperation.<br>In this regard, the following text sets out guidelines for establishing an IMC that can contribute to human capacity building. |

| Actions: 1.1.6 | |
|---|---|
| **Municipalities involved:** | **Bitola, Prilep, Novaci, Debrca, Demir Hisar, Krivogashtani, Krushevo and Mogila (8)** |
| **A form of cooperation:** | **Pooling of financial, material and other assets**<br><br>As the municipalities' action plans state that expert support is required for the implementation of the activities within a period of no longer than six months, the involvement of external experts is an appropriate form of cooperation.<br>Their engagement can be jointly financed by the municipalities involved through a pooling agreement.<br>For the implementation and coordination of inter-municipal cooperation activities, responsibility is located in the departments of environment, utilities, LED, and the PUC. |
| **Legal bases according to the LIMC:** | Article 30 |
| **Modality of Cooperation Implementation:** | Municipalities may pool financial, material and other resources for the implementation of joint projects in the exercise of their competences. To this end, the mayors conclude an agreement following previous decisions of the municipal councils. In addition to the municipalities pooling assets and resources, the agreement shall contain the type and amount of the assets to be pooled, the purpose of the assets to be pooled, the manner in which the assets are disposed of and managed, the manner of distribution of benefits and risks, the terms and procedure for termination of the contract, and other matters.<br>For the implementation and coordination of inter-municipal cooperation activities, responsibility is located in the departments of environment, utilities, LED, and the PUC. |
| **Work done through the IMC:** | ▪ An analysis of the needs of the type of educational programs intended for employees |

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| | ▪ Development of a plan and educational programs for employees of the operating departments for data organization and management, based on the needs identified<br>▪ Delivery of educational programs for employees |
| **Time period for the implementation of the envisaged activities under the LAP:** | 6 months |
| **Comment:**<br>If sustainability in human resources management in the long term is to be considered, including the function of training and development of personnel, an appropriate form of inter-municipal cooperation which could be a joint administrative body (Article 11 – Joint Administrative Body) through which to carry out the analysis of training needs, the development of educational programmes and their delivery, and the Human Resource Management System. It would constitute an institutional framework for establishing the learning platform proposed in the Pilot Municipalities Capacity Assessment, which would be operational indefinitely. | |

## 4. AREA OF COOPERATION: IDENTIFICATION OF SOURCES OF FUNDING AND EFFECTIVE FINANCIAL PLANNING

| Actions: 1.2.1 | |
|---|---|
| **Municipalities involved:** | **Bitola, Kichevo, Ohrid, Prilep, Novaci, Plasnitsa, Debrca, Demir Hisar, Dolneni, Krivogashtani, Krushevo, Mogila, Resen, Struga and Vevcani (15)** |
| **A form of cooperation:** | **Joint Working Body**<br><br>Establishment **of a joint working group** of a permanent nature to consider certain issues within the competence of the mayor, i.e. identification of sources of funding and effective financial planning for the provision of equipment for the delivery of improved services. |
| **Legal bases according to the LIMC:** | Article 10 |
| **Modality of Cooperation Implementation:** | The modalilty of implementatoin of the cooperation is described in Area 1. |
| **Composition of the JWB:** | The action plans propose that the working group be composed of representatives of the departments of environmental protection, LED, finance and PUC.<br>The involvement of external experts is also possible. |
| **Work done through the IMC:** | ▪ Monitoring current and future funding calls<br>▪ Preparation of a semi-annual report on funding sources and financial planning<br>▪ Preparation of applications for identified calls |
| **Time period for the implementation of the envisaged activities under the LAP:** | 24 months.<br><br>The working group would work continuously for an extended period of time with the possibility of further extension or indefinitely. |
| **Comment:**<br><br>If the scope of activities is not possible to realise with the existing capacities of the municipalities involved and their representatives in the WRG, then **pooling funds are available to engage external expertise** in a form of IMC. | |

## 5. AREA OF COOPERATION: PROCUREMENT OF VEHICLES, BINS/CONTAINERS AND OTHER EQUIPMENT

| Actions: 1.2.2 | |
|---|---|
| **Municipalities involved:** | **Bitola, Prilep, Debrca, Demir Hisar, Dolneni, Krivogashtani, Resen and Vevcani (8)** |
| **A form of cooperation:** | **Joint Working Body**<br><br>Formation of a joint working body of a temporary nature, to consider certain issues within the competence of the Mayor, i.e. Procurement of vehicles, bins/containers and other equipment. |
| **Legal bases according to the LIMC:** | Article 10 |
| **Modality of Cooperation Implementation:** | The modalilty of implementatoin of the cooperation is described in Area 1. |
| **Composition of the JWB:** | It is evident in the action plans that the JWB should be drawn up predominantly to representatives of the PUC, but responsibility is also located among representatives of the environmental departments.<br>The involvement of external experts is also possible. |
| **Work done through the IMC:** | ▪ Determination of the factual situation with the equipment of the PUC<br>▪ Analysis of the needs for the procurement of new vehicles, bins/containers<br>▪ Preparation of the necessary documentation for the procurement of equipment - vehicles and bins/containers (preparation for public procurement)<br>▪ Procurement of vehicles and bins/containers<br>▪ Installation of new bins/containers (by PUC)<br>▪ Providing training to utility employees working in the field |
| **Time period of implementation the envisaged activities under the LAP:** | 6 месеци |
| **Comment:**<br><br>The working body would also prepare the basis for the implementation of public procurement to be carried out further under the Law on Public Procurement and the Professional Services of the Municipalities. **Group purchase** is a possible option.<br>If the scope of activities related to the analysis for all municipalities is not possible to realise with the existing capacities of the municipalities involved and their representatives in the IMC, then **pooling funds** is available to engage external expertise in a form of IMC.<br>In the context of inter-municipal cooperation, the implementation period of 6 months should be revised. | |

## 5.2. PRIORITY 2 – INTRODUCTION OF A WASTE SELECTION SYSTEM AND COLLECTION OF SEPARATE WASTE STREAMS

### 6. AREA OF COOPERATION: CONDUCTING ANALYSIS TO DETERMINE SPECIFIC WASTE FLOWS AND METHODS OF TREATMENT

| Actions: A 2.1.1 и A 2.1.2 | |
|---|---|
| **Municipalities involved:** | **Kichevo, Ohrid, Prilep, Novaci, Plasnitsa, Debrca, Demir Hisar, Dolneni, Mogila, Resen and Vevchani (11)** |
| **A form of cooperation:** | **Pooling of financial, material and other assets**<br><br>For the preparation of the list of specific waste streams based on an analysis to be carried out by an external expert within a period of 3 months, an appropriate form of cooperation is pooling financial resources of the municipalities involved to cover the costs.<br>For the implementation and coordination of inter-municipal cooperation activities, responsibility is located in the departments of environment, communal activities, urbanism, LER, and the PUC. |
| **Legal bases according to the LIMC:** | Article 30 |
| **Modality of Cooperation Implementation:** | The modalilty of implementatoin of the cooperation is described in Area 3. |
| **Work done through the IMC:** | ▪ Engagement of an expert to conduct the analysis and develop a methodology<br>▪ Defining specific waste streams in the municipality<br>▪ Conducting a comprehensive analysis of specific and specific waste flows generated on the territory of the municipality, quantities and methods of treatment<br>▪ Development of a plan for records and categorization of types of waste on the territory of the municipality and method of procedure<br>▪ Preparation of an analysis report (quantities of separate waste streams; determination of quantities of separate waste streams; development of a waste selection and collection plan<br>▪ Preparation of a database of separate waste streams generated on the territory of the municipality<br>▪ Preparation of a report and a list of special waste streams |
| **Time period of implementation the activities envisaged under the LAP:** | 3 months |
| **Comment:**<br>In the context of inter-municipal cooperation, the implementation period of 3 months should be revised. | |

## 7. AREA OF COOPERATION: CONDUCTING MARKET ANALYSIS OF RECYCLING MATERIALS, WASTE SELECTION COSTS, AS WELL AS IDENTIFYING AND SECURING WASTE BUYERS

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|---|---|
| LAP activities implemented | The activities in this area, envisaged in the Local Action Plans for Waste Management, have been implemented with the support of the SALAR project, in order to respond to the expressed needs of municipalities for relevant data on the current state of the recyclable materials market, and towards more efficient management of the different waste flows and approaching the circular economy model. The report titled "Analysis of the Recycling Materials Market in the Southwest and Pelagonia Regions" has been published.<br>Project support allowed to overcome the limited technical and analytical capacities of individual municipalities and provided guidance for planning the necessary resources and investments.<br><br>In the future, this type of analytical and planning activities are particularly suitable for implementation through inter-municipal cooperation, as they allow achieving economies of scale, more efficient and cost-effective engagement of specialized expertise and application of a unified methodology. Conducting such analyses within the framework of the IMC contributes to the provision of consistent and comparable data at the regional level, which forms the basis for coordinated planning, harmonized regional policies and the definition of common measures in the field of waste management. |

| Actions: 2.2.1, 2.2.2 и 2.3.5 | |
|---|---|
| **Municipalities involved:** | **Bitola, Kichevo, Ohrid, Prilep, Novaci, Plasnitsa, Dolneni, Krivogashtani, Mogila, Resen, Struga and Vevchani (12)** |
| **A form of cooperation:** | **Pooling of financial, material and other assets.**<br><br>For the analysis to be carried out by an external expert over a period of 2 months, an appropriate form of cooperation is pooling financial resources of the municipalities involved to cover the costs.<br>For the implementation and coordination of inter-municipal cooperation activities, responsibility is located in the departments of environment, communal activities, urbanism, LED, and the PUC. |
| **Legal bases according to the LIMC:** | Article 30 |
| **Modality of Cooperation Implementation:** | The modalilty of implementatoin of the cooperation is described in Area 3. |
| **Work done through the IMC:** | ▪ Engagement of an expert to conduct the analysis of the Recycling Materials Market and Waste Selection Costs<br>▪ Conducting a comprehensive market analysis according to a predetermined methodology<br>▪ Preparation of a report on waste selection and recycling opportunities and costs/benefits<br>▪ Identifying and securing waste buyers |

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| | ▪ Provision of information from the register of companies engaged in the selection and recycling of waste (communication with the Ministry of the Environment)<br>▪ Cooperation with enterprises engaged in the selection and transportation of various types of selected waste |
| **Time period of implementation the activities envisaged under the LAP:** | 2 months |
| **Comment:**<br>The activities of this cooperation should be considered as logical and subsequent activities of the previously proposed cooperation (A 2.1.1, A 2.1.2).<br>Thus, it is possible, within the framework of the same form of unified inter-municipal cooperation, to engage external expertise to carry out the activities of the two envisaged cooperation.<br><br>In the context of inter-municipal cooperation, the implementation period of 2 months should be revised. | |

## 8. AREA OF COOPERATION: INTRODUCTION OF A SYSTEM AND CREATION OF A FAVORABLE ENVIRONMENT FOR WASTE SELECTION BY RAISING PUBLIC AWARENESS AND MOTIVATING THE POPULATION FOR THE BENEFITS OF WASTE SELECTION

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|---|---|
| LAP activities implemented | At the constituent session of the Inter-Municipal Waste Management Board (IMWMB) of the Pelagonia and Southwest Regions, held on December 10, 2025, it was concluded that it is necessary to draw up a list of stakeholders and a clear plan that, through the established information and communication mechanism, will inform about the work of the Board. This conclusion only confirms the commitment at the political level to involve the parties concerned and inform the public about the regional waste management system, which in turn can undoubtedly be supported and implemented through joint inter-municipal initiatives of the partner municipalities.<br>Within the framework of the SALAR project, several activities were implemented aimed at raising public awareness of proper and sustainable waste management in local communities. Municipalities organised large-scale campaigns and public events to promote sustainable habits and responsible waste management. The activities were also integrated into significant cultural events, including during the "Ohrid Summer" in Ohrid and the celebration of the 100th anniversary of the Prilep Brewery in Prilep, thus reaching a wider audience. In parallel, sustainable waste management trainings were conducted for primary school teachers in both regions, with the aim of embedding environmental principles in the educational process in the long term. In addition, the "Clean is Beautiful" campaign is underway in Ohrid, which has the potential and ambition to grow into a regional initiative to raise public awareness.<br><br>As stated in IMCt of the local action plans, activities to raise public awareness and involve stakeholders are of a continuous nature, which opens up a clear opportunity for joint and coordinated participation of partner municipalities through inter-municipal cooperation, using the potential forms outlined in the guidelines. |

| Actions: 2.2.3 и 2.2.4 | |
|---|---|
| **Municipalities involved:** | **Bitola, Kichevo, Ohrid, Prilep, Novaci, Plasnitsa, Demir Hisar, Dolneni, Krivogashtani, Krushevo, Mogila, Resen, Struga and Vevchani (14)** |
| **A form of cooperation:** | **Pooling of financial, material and other assets.**<br><br>Given that the implementation of public awareness campaigns on the need and benefits of waste selection should be carried out continuously, municipalities should cooperate in co-financing and organizing the specific activities arising from action plans.<br>The funds can be used to engage local civil society organizations experienced in developing and implementing public campaigns and activities for various target groups in the direction of raising awareness and motivating them to waste selection. You may also want to consider hiring a marketing agency on a commercial basis.<br>Through this form of inter-municipal cooperation, the municipalities involved would have to regularly allocate funds in their budgets to co-finance activities, i.e. things they would entrust to a civil sector organisation (or marketing agency) on the basis of a contract.<br><br>**Joint Working Body**<br>As a form that would precede the pooling of funds, the formation of a joint working body could be taken into account to take care of the overall process of raising public awareness and motivating the population.<br><br>In fulfilling the activities for this inter-municipal cooperation, a phased approach should be considered and the introduction of two forms of cooperation – a joint working body and pooling of financial resources.<br>For the implementation and coordination of inter-municipal cooperation activities, responsibility is located in the departments of environment, communal activities, urbanism, LED, and the PUC. |
| **Legal bases according to the LIMC:** | Article 30 |
| **Modality of Cooperation Implementation:** | The modalilty of implementatoin of the cooperation is described in Area 3. |
| **Work done through the IMC:** | ▪ Engage an NGO/Commercial Agency to Conduct Public Campaigns<br>▪ Preparation of a pilot settlement plan to begin waste selection and commencement of implementation<br>▪ Analysis of household inclusion in primary selection<br>▪ Development of a plan for the involvement of the affected (legal entities and individuals) for the introduction of a waste selection system<br>▪ Developing a plan to raise public awareness<br>▪ Formation of a team to implement the planned activities (joint working body)<br>▪ Conducting a campaign to raise awareness about the benefits of waste selection<br>○ Educational events in kindergartens, schools and media<br>○ Implementation of mini-eco campaigns through cultural events (e.g. within the framework of "10 Days of Krushevo Republic")<br>○ Holding Direct Meetings with Specific Categories of Citizens and Gender Equality<br>○ Inclusion of religious institutions in public stands |

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| **Time period of implementation the activities envisaged under the LAP:** | 24 months.<br>Inter-municipal cooperation should take place in continuity over a longer period of time with the possibility of further continuation. |
| **Comment:**<br>In the part of the public campaign, the aspect of raising public awareness and motivating the population for the selection of organic waste arising from the activities of priority 3 of the action plans, goal 3.1 Creating a favorable environment for the selection of organic waste can also be embedded. | |

## 9. AREA OF COOPERATION: IDENTIFICATION OF LOCATIONS FOR WASTE SELECTION AND BALING FACILITIES

| Actions: 2.3.2 и 2.3.4 | |
|---|---|
| **Municipalities involved:** | **Debrca, Kichevo, Dolneni, Krushevo, Ohrid and Resen (6)** |
| **A form of cooperation:** | **Joint Working Body**<br><br>Formation **of a joint working body** of a temporary nature, to consider certain issues within the competence of the mayor, i.e. identification of locations for waste selection and baling facilities. |
| **Legal bases according to the LIMC:** | Article 10 |
| **Modality of Cooperation Implementation:** | The modalilty of implementatoin of the cooperation is described in Area 1. |
| **Work done through the IMC:** | ▪ Analysis of possible sites for waste selection<br>▪ Selection of locations for setting up bins for waste selection<br>▪ Preparation of the necessary urban planning and design documentation for the placement of the necessary equipment for the primary selection of waste<br>▪ Placement of selection bins at predetermined locations<br>▪ Preparation of a final report on the placement of waste selection bins<br>▪ Analysis of current capacities and additional opportunities for waste selection and baling<br>▪ Market Analysis for Types of Waste Baling Machines and Machine Selection<br>▪ Development of a plan for adaptation of waste baling capacity and training of employees in the management of selected waste |
| **Time period of implementation the activities envisaged under the LAP:** | 6 months |
| **Commentary:**<br>If the scope of activities and the need for additional specific expertise cannot be ensured by the existing capacities of the municipalities involved and their representatives in the IMC, then a form of IMC is available - pooling of funds to engage external expertise as a form of IMC.<br>At the same time, the hiring of external expertise should go in two directions: one for conducting the envisaged analysis, and the other for the preparation of the necessary urban and design documentation for the installation of the necessary equipment for the primary waste selection.<br>In the context of inter-municipal cooperation, the implementation period of 6 months should be revised. | |

## 10. AREA OF COOPERATION: CONSTRUCTION OF ISLANDS FOR WASTE SELECTION AND EQUIPMENT PROCUREMENT

| Actions: 2.3.6 и 2.3.7 | |
|---|---|
| **Municipalities involved:** | **Дебрца, Кичево, Долнени, Крушево и Ресен (5)** |
| **A form of cooperation:** | **Joint Working Body**<br><br>Formation **of a joint working body** of an interim nature, to consider certain issues within the competence of the mayor, i.e. the construction of islands for waste selection and the purchase of appropriate equipment. |
| **Legal bases according to the LIMC:** | Article 10 |
| **Modality of Cooperation Implementation:** | The modality of implementation of the cooperation is described in Area 1. |
| **Work done through the IMC:** | ▪ Analysis of existing and planning of new construction sites on ecological islands<br>▪ Defining the required number of recycling containers<br>▪ Adopt a new plan for the number and layout of containers<br>▪ Determination of the need for vehicles, bins and containers<br>▪ Procurement of vehicles, bins and containers<br>▪ Planning for the allocation of bins for catering facilities and tourism for the selection of clean biodegradable waste<br>▪ - Prepared food and unused food<br>▪ Implementation of pilot projects and promotion of the new selection model |
| **Time period of implementation the activities envisaged under the LAP:** | 9 months |
| **Коментар:**<br>The Joint Working Body should be responsible for carrying out the necessary analyses and subsequently monitoring the procurement of the necessary equipment and putting it into operation. It is also a place for the exchange of experiences between the municipalities involved. | |

## 5.3. PRIORITY 3 – REDUCING THE AMOUNT OF ORGANIC WASTE ENDING UP IN LANDFILLS

### 11. AREA OF COOPERATION: CONDUCTING ANALYSIS OF QUANTITIES AND MODELS OF ORGANIC WASTE AND PROFITABILITY AND BENEFITS FOR THE SELECTION AND TREATMENT OF ORGANIC WASTE

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|---|---|
| LAP activities implemented | The activities in this area, envisaged in the Local Action Plans for Waste Management, have been implemented with the support of the SALAR project, in order to respond to the expressed needs of municipalities for relevant data on the current state of the market for recyclables and organic waste, and in the direction of more efficient management of the different waste flows and approaching the circular economy model. The report titled "Analysis of the Recycling Materials Market in the Southwest and Pelagonia Regions" has been published.<br>More specifically in this area, project support has hired an expert to perform the analysis of the quantities and models of organic waste and the cost-effectiveness and benefits of organic waste selection and treatment. An analysis of organic waste quantities and models has been carried out and a report on organic waste quantities and models has been prepared with recommendations for profitability and benefits of selection. It remains through joint collaboration to create a database of organic waste and to plan and design a mini composting project. |

| Actions: 3.1.1 и 3.1.2 | | |
|---|---|---|
| **Municipalities involved:** | **Bitola, Kichevo, Ohrid, Prilep, Novaci, Plasnica, Debrca, Demir Hisar, Dolneni, Krivogashtani, Mogila, Resen, Struga and Vevchani (14)** | |
| **A form of cooperation:** | **Pooling of financial, material and other assets.** | |
| **Legal bases according to the LIMC:** | Article 30 | |
| **Modality of Cooperation Implementation:** | The modalilty of implementatoin of the cooperation is described in Area 3. | |
| **Work done through the IMC:** | ▪ Creating an organic waste database<br>▪ Planning and drafting a mini composter project | |
| **Time period for the implementation of the envisaged activities under the LAP:** | 2 months | |
| **Comment:**<br>Although it is envisaged in the LAP that the activities will be carried out within a period of two months, it seems that the remaining two activities cannot realistically be implemented in such a short period, especially since when engaging external expertise it needs to be ensured through the implementation of a public procurement by one of the partner municipalities. Creating a database and drafting a project are also time-consuming activities.<br>In addition, if the fourteen municipalities decide to establish cooperation, it is necessary to take into account the preparation of an assessment of the need for the IMC, as well as the legal deadlines for the formal establishment of the IMC and decision-making of all councils, which would actually take up to three months.<br>In the direction of streamlining the number of inter-community collaborations, it is also worth considering the possibility of merging these activities into the envisaged IMC of Area 9 for the preparation of a mini-composting project and into Area 26 for the creation of an organic waste database as one of the segments of the comprehensive collection system, processing, analysis and monitoring of data related to waste management. | | |

## 12. AREA OF COOPERATION: RAISING PUBLIC AWARENESS ABOUT THE SELECTION AND TREATMENT OF ORGANIC WASTE

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| LAP activities implemented | The public awareness raising activities implemented within the framework of the SALAR project also covered topics related to the selection and treatment of organic waste, in order to advance the knowledge and practices of citizens in this area.<br>More specifically, activities related to the implementation of eco-actions and educational classes in primary schools and kindergartens have been implemented, as well as raising public awareness and motivating the population for the selection of organic waste. |

| Actions: 3.1.4 | | |
|---|---|---|
| **Municipalities involved:** | **Novaci, Dolneni, Krivogashtani, Resen, Struga and Vevcani (6)** | |
| **A form of cooperation:** | **Pooling of financial, material and other assets**<br><br>In fulfilling the activities for this inter-municipal cooperation, consideration should be given to pooling financial resources to engage external expertise for the implementation of the envisaged activities. | |
| **Legal bases according to the LIMC:** | Article 30 | |
| **Modality of Cooperation Implementation:** | The modalilty of implementatoin of the cooperation is described in Area 1. | |
| **Work done through the IMC:** | Conducting a survey on organic waste and population surveys<br>Processing survey data and creating a report<br>▪ Creation of a program to raise public awareness of the selection of organic waste | |
| **Time period for the implementation of the envisaged activities under the LAP:** | | 18 to 24 months |
| **Commentary:**<br>The LAP envisages that activities will take place over a period of 18 to 24 months, but inter-municipal cooperation should take place in continuity over a longer period of time with the possibility of further extension. | | |

## 13. AREA OF COOPERATION: MOBILIZING SUPPORT FOR THE INTRODUCTION OF ORGANIC WASTE SELECTION AND DESIGNING AND IMPLEMENTING PILOT PROJECTS FOR ORGANIC WASTE SELECTION

| Actions: 3.3.1 и 3.3.2 | |
|---|---|
| **Municipalities involved:** | **Krivogashtani, Demir Hisar, Ohrid, Dolneni, Vevcani and Resen (6)** |
| **A form of cooperation:** | **Joint Working Body**<br><br>Formation of **a joint working body** of an interim nature to consider certain issues within the competence of the mayor, i.e. mobilizing support for the introduction of organic waste selection and design and implementation of pilot projects for organic waste selection. |
| **Legal bases according to the LIMC:** | Article 10 |
| **Modality of Cooperation Implementation:** | The modalilty of implementatoin of the cooperation is described in Area 1. |
| **Work done through the IMC:** | ▪ Identification and provision of organic waste processors<br>▪ Analysis of the Required Number of Containers for Organic Disposal<br>▪ Waste and Disposal Locations<br>▪ Procurement of special containers for the disposal of organic waste and provision of human resources<br>▪ Placing containers in appropriate places<br>▪ Hiring an expert to develop a pilot project for organic waste selection<br>▪ Design and implementation of pilot projects for organic waste selection |
| **Time period for the implementation of the envisaged activities under the LAP:** | 12 months |
| **Comment:**<br>The Joint Working Body should be responsible for conducting the necessary analyses and subsequently monitoring the procurement of the necessary equipment and putting it into operation. It is also a place for the exchange of experiences between the municipalities involved. Procurement can be conducted as a group procurement, and even analysis can be conducted by engaging external expertise through the form of pooling funds. | |

## 1. PRIORITY 4 - CONSTRUCTION OF A LANDFILL ACCORDING TO EU STANDARDS

### 14. AREA OF COOPERATION: DEFINING THE HOLDER OF THE INITIATIVE, SIGNING AN INTER-MUNICIPAL COOPERATION AGREEMENT AND SELECTING THE LEADERSHIP STRUCTURE OF THE RPUC

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| LAP activities implemented | At the initiative of the Mayor of the Municipality of Novaci, the procedure for the establishment of inter-municipal cooperation for the establishment of a Joint Public Waste Management Company (JSSS) was initiated between the municipalities: Novaci, Prilep, Bitola, Krushevo, Dolneni, Mogila, Krivogashtani, Demir Hisar, Resen, Ohrid, Sruga, Kichevo, Debar, Plasnica, Centar Župa, Vevchani, Debarca and Makedonski Brod. The headquarters of the Joint Venture will be located in the Municipality of Novaci. The proposal for inter-municipal cooperation was submitted at the 57th session of the Council of the Municipality of Novaci held on 26.11.2024.<br>On the basis of the initiative and proposal of the municipality of Novaci, the councils of all remaining municipalities have decided to establish a IMC for the formation of a joint PUC. |

| Actions: 4.2.1, 4.2.2 и 4.2.3 | |
|---|---|
| **Municipalities involved:** | **Novaci, Prilep, Bitola, Krushevo, Dolneni, Mogila, Krivogashtani, Demir Hisar, Resen, Ohrid, Struga, Kichevo, Debar, Plasnica, Centar Župa, Vevchani, Debarca and Makedonski Brod (18)** |
| **A form of cooperation:** | **Joint Public Enterprise**<br><br>**Joint Working Group** (Joint Working Body in the Preparatory Phase) |
| **Legal bases according to the LIMC:** | Article 18 |
| **Modality of Cooperation Implementation:** | A joint venture is the basis for carrying out activities of public interest of local importance.<br>Public enterprises on behalf of the municipality establish the Council of the Municipality and on behalf of the City of Skopje, the Council of the City of Skopje.<br><br>A joint public enterprise is established in a procedure determined by law, i.e. according to the Law on Public Enterprises and by a decision taken by the councils of the municipalities in the same text, by a majority of votes of the total number of members of the council of each municipality founding the joint public enterprise, according to the Law on Intermunicipal Cooperation.<br><br>Given the high institutional, legal and organizational complexity of the process of establishing a public utility company, which is further increased when it comes to inter-municipal cooperation, such a step implies significant engagement and full involvement of all partner municipalities. The process requires continuous communication, coordination and harmonized decision-making of key decisions related to the establishment, management and future functioning of the public utility company. To ensure mutual responsibility and long-term sustainability of cooperation. For this purpose, partner municipalities need an institutional coordination |

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| | mechanism in the preparatory phase, i.e. in the stage of establishing the JPUWM.<br><br>As part of the procedure for establishing the IMC, the LIMC obliges the municipal councils that have accepted the proposal, i.e. the initiative to establish inter-municipal cooperation, to form a joint commission (Article 8). A joint commission is not a form of established cooperation. It is formed during the process of establishing a joint venture in order to prepare the draft act for establishing inter-municipal cooperation, as well as the proposals of the acts for establishing the IMC form through which cooperation will be achieved — in this case, the joint public enterprise. This commission can be given the responsibility of coordinating in the preparatory phase and taking on the role of an institutional mechanism for articulating and harmonizing the different needs and interests between municipalities.<br><br>According to the law, the Joint Commission prepares proposals for acts on the basis of an analysis made beforehand. This assumes that the Commission also needs expert support in drawing out the contours of the JPUWM, i.e. involving experts in the field of waste management. The analysis may use the findings and recommendations of the Assessment of the Need for the Establishment of the IMC or analysis already carried out, Studies & Reports.<br><br>The key responsibility of the commission is the preparation of the act, i.e. the decision on the establishment of the public enterprise and the agreement concluded and signed by the mayors of the municipalities for the regulation of mutual rights and obligations.<br>The decision (act) for the establishment of a joint public enterprise specifically determines:<br>a. activity,<br>b. the company and its headquarters,<br>c. the amount of funds to be established and the manner in which they are provided,<br>d. the organization of the joint public enterprise,<br>e. the manner of implementing the decisions of the bodies of the joint public enterprise,<br>f. the liability of the joint public enterprise for its obligations in legal transactions with third parties,<br>g. the deadline for the enactment of the statute and the appointment of the bodies of the joint public enterprise,<br>h. the appointment of a person who will manage the affairs of the company until its constitution,<br>i. the number, composition and manner of election of the members of the Board of Directors,<br>j. the manner in which the director of the joint public enterprise is elected, and<br>k. the composition and manner of election of the Supervisory Board.<br><br>The Commission can potentially contribute to the preparation of procedures for the selection and appointment of the bodies of the public enterprise: the Management Board, the Supervisory Board for Control of Material and Financial Affairs, and the Director.<br>These procedures and the conditions for selection are defined in detail in the Public Enterprises Act.<br>The Joint Public Enterprise submits the acts to the councils of the municipalities simultaneously and in the same text.<br>The consent of the acts of the joint public enterprise is given by the adoption of a separate act of giving consent by each council of the municipalities founding the joint public enterprise. |

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| | The founder(s) of the public enterprise shall give consent to: 1. The statute of the public enterprise; 2. Status changes; 3. An act on the use of funds derived from the operation of a public enterprise and the coverage of losses; 4. The Public Company Indebtedness Act; 5. An act fixing the prices of products and services that a public company sells and performs to customers if such prices are not subject to regulation by an independent regulatory body; 6. The act for determining the amount of the value of the point for calculating the salaries of employees of the public company; 7. Annual Account and Report on the Operation of the Public Enterprise and 8. Annual investment program aligned with overall economic development. This reaffirms the crucial role of municipal councils in inter-municipal cooperation.<br><br>Although at a preparatory stage the commission would be tasked with carrying the burden of coordinating and procedural support to the process of establishing the enterprise, ata later stage, this working body may evolve into a coordinating body for monitoring inter-municipal cooperation, as recommended by the provisions of the Inter-Municipal Cooperation Law.<br><br>The procedure for establishing a joint venture is given in Articles 18 to 23 of the Law on Intermunicipal Cooperation. |
| **Work done through the IMC:** | ▪ Taking the initiative<br>▪ Making a decision on the council<br>▪ Signing of an inter-municipal cooperation agreement<br>▪ Selection of management structures |
| **Time period for the implementation of the envisaged activities under the LAP:** | 1 month |
| **Comment:**<br>Although the action plans of the other municipalities do not specify this priority, according to the regional approach to waste management, of course these municipalities should also participate in the establishment of the regional public utility company.<br>Also, the plans state that this process would take 1 month, but realistically at least 6 months should be provided due to the need for intensive communication and coordination, as well as additional time for the establishment of the enterprise. | |

## 15. AREA OF COOPERATION: DEVELOPING A STUDY THAT IDENTIFIES CHANGES IN MUNICIPAL WASTE MANAGEMENT PRACTICES AS A RESULT OF RWS AND REGIONAL LANDFILLS

| Actions: 4.2.1, 4.2.2 и 4.2.3 | |
|---|---|
| **Municipalities involved:** | **Pooling of financial, material and other assets** |
| **A form of cooperation:** | **Здружување на финансиски, материјални и други средства** |
| **Legal bases according to the LIMC:** | Article 30 |
| **Modality of Cooperation Implementation:** | The modalilty of implementatoin of the cooperation is described in Area 3. |
| **Work done through the IMC:** | ▪ Assembling a team for preparatory activities and data collection<br>▪ Selection and hiring of a consulting company to produce the study<br>▪ Analysis of the existing situation and alignment with municipal waste management practices in accordance with the RSAS |

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| | ▪ Development of a study identifying changes in municipal waste management practices |
| **Time period for the implementation of the envisaged activities under the LAP:** | 6 months |
| **Comment:**<br>In the context of inter-municipal cooperation, the implementation period of 6 months should be reviewed, especially due to the conduct of public procurement and the conduct of analysis. | |

## 16. AREA OF COOPERATION: FULFILLMENT OF THE NECESSARY CONDITIONS FOR THE CONSTRUCTION OF TRANSSHIPMENT STATIONS

| Actions: A 4.1.2 | |
|---|---|
| **Municipalities involved:** | **Охрид и Прилеп** |
| **A form of cooperation:** | **Joint Working Body**<br><br>Formation of a joint working body of an interim nature, to consider certain issues within the competence of the mayor, i.e. fulfillment of the necessary conditions for the construction of transshipment stations as an integral part of the regional waste management system in accordance with EU standards<br><br>If there is a need to engage external expertise for the development of urban planning projects for the sites envisaged for a loading station and the preparation of urban planning documentation, then the possibility of **pooling funding should be considered.** |
| **Legal bases according to the LIMC:** | Article 10 |
| **Modality of Cooperation Implementation:** | The modalilty of implementatoin of the cooperation is described in Area 1. |
| **Compositoin of JWB:** | The working group would be composed of representatives from the sectors of urbanism, communal services and environmental protection, as well as representatives of the Public Utility Company from both municipalities. Thus, through joint activities and exchange of experiences, the competent municipal administrations will be able to more effectively fulfill the objective and implement the activities envisaged in their action plans, and related to the preparation of urban documentation necessary for the construction of transshipment stations. |
| **Work done through the IMC:** | ▪ Development of urban planning projects for the locations envisaged for a transshipment station<br>▪ Preparation of urban planning documentation<br>▪ Approval of the basic design for the sites envisaged for the transfer station<br>▪ Preparation of documentation for council decision-making |
| **Time period for the implementation of the envisaged activities under the LAP:** | 10 months |
| **Commentary:**<br>In the direction of streamlining the number of inter-municipal cooperations, it is worth considering the possibility of merging these activities into the envisaged IMC of Area 9 which also | |

envisages the development of urban projects and the preparation of urban planning documentation, which in principle could potentially be carried out through a form of cooperation and public procurement.

In the context of inter-municipal cooperation, the implementation period of 10 months should be revised, especially due to the conduct of public procurement and the conduct of analyses.

## 5.4. PRIORITY 5 - CLOSURE AND REMEDIATION OF DUMPSITES (ILLEGAL LANDFILLS)

### 17. AREA OF COOPERATION: MAPPING OF MUNICIPAL LANDFILLS AND DEVELOPMENT OF A PRIORITY LIST, AS WELL AS ESTIMATION OF THE COSTS OF CLOSURE AND REMEDIATION OF LANDFILLS

| | |
|---|---|
| LAP activities implemented | With the support of the SALAR project, a methodology for mapping and revitalization of municipal landfills was developed and it was piloted in the municipalities of Kichevo and Krushevo.<br><br>The experience of the municipalities of Kichevo and Krushevo can represent a significant practical resource for the joint working body in the implementation of the envisaged activities in this area through inter-municipal cooperation, especially in the field of knowledge transfer, application of good practices and reduction of operational risks. |

| Actions: 5.1.1, 5.1.2 и 5.1.3 | |
|---|---|
| **Municipalities involved:** | **Bitola, Kichevo, Ohrid, Prilep, Debrca, Demir Hisar, Dolneni, Novaci, Krivogashtani, Krushevo, Mogila, Resen, Struga and Vevchani (14)** |
| **A form of cooperation:** | **Joint Working Body**<br><br>Given the limited time period for the implementation of the activities of this action through inter-municipal cooperation, the IMCt appropriate form of cooperation is the formation of an occasional joint working body to consider certain issues within the competence of the mayor, i.e. mapping of municipal landfills and the preparation of a priority list, as well as an assessment of the costs of closure and remediation of landfills in municipal budgets. |
| **Legal bases according to the LIMC:** | Article 10 |
| **Modality of Cooperation Implementation:** | The modalilty of implementatoin of the cooperation is described in Area 1. |
| **Composition of the JWB:** | To meet the objectives of this inter-municipal cooperation, the active involvement of the PUC is necessary, but in direct coordination with the municipal departments of LED, environment and finance.<br>Hence, the joint working body should be composed of representatives of these institutions. |
| **Activites to do through the IMC:** | ▪ Data collection/mapping of municipal landfills<br>▪ Determination of locations, number and quantities of municipal landfill waste |

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| | ▪ Development of a regional database of mapped landfills<br>▪ Report on Municipal Landfills Located<br>▪ Defining criteria for prioritization, determining locations that are prioritized for closure, and estimating costs<br>▪ Development of a priority list for closure and remediation of landfills according to established methodology<br>▪ Analysis and identification of necessary funds for the remediation of priority landfills and closure of landfills<br>▪ Inclusion of identified funds in the municipal budget |
| **Time period for the implementation of the envisaged activities under the LAP:** | 12 months |
| **Comment:**<br>Within the framework of this inter-municipal cooperation, three logical consecutive actions of the first priority objective are included, so the time period for the functioning of the joint working body is envisaged to last 12 months. | |

## 18. AREA OF COOPERATION: CLOSURE/REMEDIATION OF PRIORITY DUMPSITES

| Actions: 5.2.1 и 5.2.2 | |
|---|---|
| **Municipalities involved:** | **Novaci, Demir Hisar, Resen, Struga (4)** |
| **A form of cooperation:** | **Joint Working Body**<br>**Pooling of financial, material and other assets.**<br><br>In fulfilling the activities for this inter-municipal cooperation, a phased approach should be considered and the introduction of two forms of cooperation – a joint working body and pooling of financial resources.<br><br>**Joint Working Body**<br>As a form that would precede the pooling of funds, the formation of a joint working body could be considered to take care of the overall process of drawing up a plan for the closure and remediation of landfills, the preparation of the joint procurement, and the monitoring and evaluation of the envisaged activities.<br><br>**Pooling of financial, material and other assets**<br>Municipalities may pool funds to conduct a public procurement procedure to select the IMCt favorable bidder for closure and rehabilitation – a specialized company. |
| **Legal bases according to the LIMC:** | Article 10<br>Article 30 |
| **Modality of Cooperation Implementation:** | The modalilty of implementatoin of the cooperation is described in Area 1 and 3. |
| **Work done through the IMC:** | ▪ Preparation of a plan with identified priorities for the closure and remediation of landfills<br>▪ Implementation of a public procurement procedure for the selection of the IMCt favorable bidder for closure and rehabilitation<br>▪ Clearing waste that cannot be landfilled at the municipal landfill and supervising the operator's work |

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|---|---|
| | ▪ Formation of a team to monitor and evaluate activities (joint working body)<br>▪ Monitoring and evaluation of anticipated activities<br>▪ Preparation of minutes of executive inspection supervision during landfill rehabilitation<br>▪ Preparation of a final report on the activities implemented |
| **Time period for the implementation of the envisaged activities under the LAP:** | The plans call for activities to take place over a period of 3 to 9 months, but inter-municipal cooperation should take place over a longer period of time. |
| **Comment:**<br>Given the complexity of the process of closure and remediation of landfills, as an alternative to the previous one, within the framework of inter-municipal cooperation, this operational work can be assigned to an existing public utility company that should possess the capacity and knowledge to solve such complex tasks, and in this case would deliver services at the expense of other municipalities. But if that's not the case, landfill closure and remediation is a job for a specialized firm that partner municipalities can engage through pooling funding as a form of inter-municipal collaboration. | |

## 19. AREA OF COOPERATION: RAISING PUBLIC AWARENESS AND MOTIVATING FOR PROPER WASTE DISPOSAL SO THAT MUNICIPALITIES ARE CLEAN AND ORDERLY

| Actions: 5.2.3 | |
|---|---|
| **Municipalities involved:** | **Novaci, Debrca, Demir Hisar, Mogila, Resen (5)** |
| **A form of cooperation:** | **Pooling of financial, material and other assets**<br><br>A more detailed description of the form of cooperation is given in Area of Cooperation No. 8.<br><br>**A joint working body** that would take care of the overall process of raising public awareness and motivating the population |
| **Legal bases according to the LIMC:** | Article 30 |
| **Modality of Cooperation Implementation:** | The modalilty of implementatoin of the cooperation is described in Area 3. |
| **Work done through the IMC:** | ▪ Creating a campaign to raise public awareness for a clean and tidy community<br>▪ Conducting educational meetings on waste disposal<br>▪ Implementation of mini-eco campaigns within the framework of cultural events organized by the municipality<br>▪ Implementation of eco-actions and educational classes in primary schools and kindergartens |
| **Time period for the implementation of the envisaged activities under the LAP:** | In continuity |
| **Comment:** | |

As a form that would precede the pooling of funds, the formation of a joint working body could be taken into account to take care of the overall process of raising public awareness and motivating the population.
In fulfilling the activities for this inter-municipal cooperation, a phased approach should be considered and the introduction of two forms of cooperation – a joint working body and pooling of financial resources.

In the direction of streamlining the number of IMCs, this cooperation can be merged with the Area 8 cooperation, which in turn includes 14 partner municipalities, including four from this area. With this intervention, the municipality of Debarca would also be involved in comprehensive activities to raise public awareness in both regions.

## 5.5. PRIORITY 6 - PROVIDE REVENUE THAT FULLY COVERS THE COST OF WASTE MANAGEMENT

### 20. AREA OF COOPERATION: DETERMINING THE GAP BETWEEN REVENUES AND EXPENDITURES IN WASTE MANAGEMENT ACTIVITIES

| Actions: 6.1.1 | |
|---|---|
| **Municipalities involved:** | **Bitola, Kichevo, Prilep, Novaci, Plasnitsa, Debrca, Demir Hisar, Dolneni, Krivogashtani, Krushevo, Mogila, Resen, Struga, Vevchani and Ohrid (15)** |
| **A form of cooperation:** | **Pooling of financial, material and other assets**<br><br>To engage expertise to determine the income and expenditure gap of waste management activities. |
| **Legal bases according to the LIMC:** | Article 30 |
| **Modality of Cooperation Implementation:** | The modalilty of implementatoin of the cooperation is described in Area 3. |
| **Municipality Conducting Procurement:** | It is clear from the action plans that in order to achieve the goal, all municipalities need external expertise to conduct a comprehensive analysis that will determine the gap between revenues and expenditures in waste management. Through the envisaged form of inter-municipal cooperation, the necessary funds will be provided for the engagement of an appropriate expert organization or professional person. The preparation of documentation and the implementation of public procurement should be carried out by the municipality that will assume this obligation according to the concluded agreement, and in constant coordination with all other municipalities. |
| **Work done through the IMC:** | ▪ Preparation of documentation and implementation of public procurement<br>▪ Engaging an expert organization or expert to conduct the analysis<br>▪ Monitoring and analysis of total revenues and expenditures from waste management activities according to a previously established methodology<br>▪ Preparation of a report with recommendations to bridge the identified gap between income and expenditure<br>▪ Adoption of the recommendations and their implementation by the PUC |
| **Time period for the implementation of the envisaged activities under the LAP:** | 12 months |
| **Comment:** | |

Given that a public procurement is to be carried out to engage external expertise for all municipalities, it is worth considering the possibility offered by a group procurement as a mechanism implemented by a contracting body on behalf of a group of contracting bodies, following a previously concluded agreement for the execution of the group procurement.

## 21. AREA OF COOPERATION: DETERMINATION OF THE RATE OF COLLECTION OF THE WASTE FEE

| Actions: 6.1.2 | |
|---|---|
| **Municipalities involved:** | **Novaci, Debrca, Dolneni, Krivogaštani and Mogila (5)** |
| **A form of cooperation:** | **Pooling of financial, material and other assets**<br><br>To engage expertise to determine the rate of collection of waste fees and gaps in waste fees. |
| **Legal bases according to the LIMC:** | Article 30 |
| **Modality of Cooperation Implementation:** | The modalilty of implementatoin of the cooperation is described in Area 3. |
| **Work done through the IMC:** | ▪ Analysis of the financial statements of the PUC<br>▪ Preparation of an analysis report on the deficiencies in waste fees with a recommendation for the rate of collection of the waste fee |
| **Time period for the implementation of the envisaged activities under the LAP:** | 1 month |
| **Comment:**<br>Given the short period of implementation of the envisaged activities, it is advisable to combine this cooperation within the framework of previous cooperation<br>Also, bearing in mind that these are municipalities with small capacity, it is worth checking whether the necessary analysis can be carried out with the capacities of one of the larger and urban municipalities of the region, in which case the form of inter-municipal cooperation could be applied – the performance of certain works by one at the expense of other municipalities. | |

## 22. AREA OF COOPERATION: INCREASING THE RATE OF COLLECTION OF WASTE FEES AND PROVIDING ADDITIONAL REVENUE FROM WASTE TRADING

| Actions: 6.2.3 и 6.2.5 | |
|---|---|
| **Municipalities involved:** | **Prilep and Novaci** |
| **A form of cooperation:** | **Performance of certain works by one municipality for one or more other municipalities** |
| **Legal bases according to the LIMC:** | Article 29 |
| **Modality of Cooperation Implementation:** | A contract is concluded for the performance of certain works within the competence of the municipalities by one municipality at the expense of one or more other municipalities. The agreement is concluded by the mayors of the municipalities after prior decisions taken by the councils of the municipalities. |

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| | The contract establishes: the municipality that performs the works within the competence of the municipality or municipalities for which the works are performed, the type of works, the type and amount of remuneration for the performance of works, the duration of the works, the conditions and procedures for termination of the contract and other issues. |
| **A municipality that does certain things:** | Comparatively, according to the Municipal Capacity Assessment, the Municipality of Prilep has more knowledge, experience and equipment than the Municipality of Novaci (Chapters VI and VIII). From there, PUC "Komunalec" - Prilep, together with the Department of Urbanism, Communal Works and Environmental Protection could perform certain works for the municipality of Novaci.<br>Given that both action plans list the PUCs as responsible for carrying out the activities, the bulk of the work to be carried out through this inter-municipal cooperation would be within their domain. |
| **Работи што се вршат преку МОС:** | ▪ Analysis of new markets for waste buyback<br>▪ Contact potential buyers and sellers and prepare draft agreements for partner municipalities, i.e. public utilities, with waste buyers.<br>▪ Taking actions to motivate citizens to increase the collection rate by providing a benefit from recyclable waste<br>▪ Donating compost, according to a decision made according to the chosen methodology, to citizens who separate biodegradable waste<br>▪ Implementation of activities to support large catering capacities that separate clean biodegradable waste in accordance with the adopted Decision<br>▪ Motivating citizens to increase the collection rate by providing a benefit from recyclable waste |
| **Time period for the implementation of the envisaged activities under the LAP:** | 24 months |
| **Comment:**<br>Within the framework of Priority 6, Action 6.2.2 of the Local Action Plans of the Municipalities of Prilep and Novaci, they have another common area of interest – the increase in the fee for waste collection. However, some of the envisaged activities are of small scale and can be carried out independently by individual PUCs, while decisions on the amount of the fee are made by the councils of both municipalities. Therefore, inter-municipal cooperation is not applicable in this section | |

## 5.6. MONITORING, COORDINATING AND REPORTING ON INTER-MUNICIPAL COOPERATION AND THE IMPLEMENTATION OF THE LAP

### 23. AREA OF COOPERATION: MONITORING, COORDINATING AND REPORTING ON INTER-MUNICIPAL COOPERATION

| | |
|---|---|
| **Municipalities involved:** | **Bitola, Kichevo, Prilep, Novaci, Plasnitsa, Debrca, Demir Hisar, Dolneni, Krivogashtani, Krushevo, Mogila, Resen, Struga, Vevchani and Ohrid (15)** |
| **A form of cooperation:** | **Joint Commission (Coordinating Body)** |
| **Legal bases according to the LIMC:** | Member of the 10th and<br>Article 38 – Coordinating body |

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| **Modality of Cooperation Implementation:** | Article 38 - A coordinating body may be established to monitor and coordinate inter-municipal cooperation between two or more municipalities.<br>The coordinating body may be established by an act establishing inter-municipal cooperation or by decisions of the councils of municipalities during the period of the co-operation. The Act shall determine:<br>- the purpose for which it is formed,<br>– scope of work,<br>- the composition and number of members of the coordinating body,<br>- the time for which the coordinate body is formed, and<br>- other issues relevant to the achievement of established inter-municipal cooperation.<br><br>Article 10 – The Joint Standing Committee shall be established to monitor, coordinate and report, as well as to consider issues and initiate decision-making by municipal authorities that are of common interest in the implementation of inter-municipal cooperation and the exercise of municipal competences. |
| **Work done through the IMC:** | ▪ Coordination of activities and discussions on the progress in the implementation of inter-municipal cooperation with reference to the work done and the difficulties observed<br>▪ Continuous reporting and communication with all stakeholders involved in inter-municipal cooperation and the implementation of plans<br>▪ Initiates decision-making related to waste management in the context of inter-municipal cooperation by local self-government bodies<br>▪ Cooperation and sharing of good practices and lessons learned with other regions in North Macedonia. |
| **Time period for the implementation of the envisaged activities under the LAP:** | The Commission would operate continuously for an extended period of time with the possibility of further extension or indefinitely. |
| **Comment:**<br><br>The Coordinating Body for the Monitoring and Coordination of Inter-Municipal Cooperation is a stipulated mechanism in the Inter-Municipal Cooperation Act. On the other hand, for the continuous monitoring of action plans, it is envisaged the formation of a municipal waste management working group, which meets as needed, but at least once a month. Synergy between these two mechanisms is necessary for the overall monitoring of the effects of the established cooperation between municipalities. | |

## 5.7. CONCLUSION OF THE ANALYSIS OF THE LOCAL ACTION PLANS

The analysis of the local action plans for waste management of the fifteen municipalities shows that there is a clear need for joint implementation of related activities, but their number and intensive dynamics of implementation within 24 months indicate the need for further prioritization of the necessary cooperation. Although the proposed 26 collaborations cover key segments of the waste management system, grouping them according to the similarity of activities and choosing the IMCt appropriate form of cooperation will contribute to greater feasibility, efficiency and rational use of existing resources.

It is important to bear in mind that the multiplicity of potential collaborations should be streamlined according to the available capacities of municipalities and avoid a situation in which collaborations that functionally overlap with each other. Care should also be taken in creating cooperatives that constitute functional wholes and that can potentially be grouped into an inter-communal co-operation. For example, the envisaged analysis of action plans could potentially fit into an inter-municipal cooperation using the form of pooling of funds, so appropriate expertise would be engaged based on a detailed specification of works and a timeframe agreed between partner municipalities. A similar approach can be applied to the activities of the plans pertaining to raising public awareness and gaining support from citizens.

The proposed inter-municipal cooperation in the field of waste management covers a wide range of topics and activities aimed at creating a common basis for planning, improving capacities and gradually establishing a functional regional system. A significant part of the activities are focused on analytical processes, through which municipalities strive to establish a common understanding of the existing state of waste management services and processes. These activities include analyses of the availability and coverage of services, the type and number of users, waste flows and quantities, the mode of treatment, and the spatial allocation of infrastructure, including landfill locations and waste selection sites. Particular attention is paid to the establishment of common databases, analysis of the financial sustainability of services through the consideration of the ratio between income and expenditure, tariff systems, collection rate, as well as analysis of existing technical equipment and organization of waste collection and transportation. In addition to analytical activities, the proposed collaborations include a common approach to strengthening human capacities through training. In this context, municipalities plan to jointly identify training needs, develop programs adapted to regional specifics and organize trainings for employees of municipalities and utilities.

A significant theme in the proposed inter-municipal cooperation is financing, whereby municipalities recognize the need for joint exploration of possible sources of funds and a coordinated approach to the preparation of project proposals and application for external funding. Inter-municipal cooperation is also recognized as an appropriate procurement mechanism, especially in the area of providing equipment necessary for waste management – waste disposal and transport containers, as well as collection and transport vehicles.

In the field of raising public awareness, the proposed collaborations envisage joint activities for public opinion research and planning and implementation of public campaigns.

Finally, a significant part of the proposed inter-municipal cooperation concerns operational activities that form the basis for the practical implementation of the regional waste management system. These activities include the preparation of urban planning and design documentation for the installation of the necessary infrastructure and equipment, the implementation of pilot projects for the selection of organic waste, the closure and rehabilitation of existing landfills, as well as steps towards the establishment of a regional public utility company.

An analysis of the areas of cooperation and the scope of involvement of municipalities shows that cooperation related to analytical and planning activities (situation analysis, financial analysis, market analysis, determination of the income gap, public campaigns and monitoring/coordination) IMCt often involve a larger number of municipalities (8–15), with in three cases covering all 15 municipalities of the region. This suggests that these areas are recognised as common interest, with low operational risks and high added value from an analytical regional approach. In contrast, coopewrations related to specific investments and operational implementation (infrastructure construction, waste selection capacities, pilot projects for organic waste, remediation of dumpsites, transfer stations, toll increases) are usually realized in smaller groups of 2 to 6 municipalities. These cooperations are more concentrated, implying greater complexity, the need for geographical proximity, financial feasibility and a more pronounced interdependence between partners. The fact that only 8 out of 15 municipalities have identified the establishment of a regional public landfill utility as a priority may indicate a partial readiness for a full regional approach. Although such a model inherently involves the participation of all municipalities, some still prefer less binding forms of inter-municipal cooperation, due to institutional and financial constraints.

These differences further underscore the importance of carefully prioritizing and selecting the IMCt appropriate and feasible forms of cooperation in the initial stages of establishing common models of work.

In terms of forms of cooperation, one half of the potential cooperation would be realized through the formation of a joint working body, and the other half concerned pooling financial resources, IMCtly to engage external expertise in conducting analysis and studies. Only one collaboration is modeled as "the performance of certain works by one municipality at the expense of others", which allows an urban municipality with stronger capacity to deliver a service to a rural one. Further analyses of the capacities available in municipalities and the PUC may result in the proposed other forms of cooperation such as the performance of certain works by one for the other municipalities, especially for those collaborations in which external expertise is required, which is carried out within one of the municipal administrations or PUCs.

Although the analysis is also based on the findings of the previous capacity assessment, some of the proposed collaborations will require additional, more detailed verification to determine which municipality can IMCt appropriately take the lead, especially in areas related to public procurement, engaging external expertise or coordinating activities. These aspects depend to a large extent on the strategic priorities of the mayors, the political support of the municipal councils and their willingness to involve their own human and financial resources within the framework of inter-municipal cooperation.

The analysis also indicates an overlap between the activities envisaged in the local action plans and the competencies that, according to the legal and strategic framework, should be carried out by the Waste Management Organizational Unit within the Planning Region Support Center. While at the regional level the Unit is envisaged to manage projects, coordinate investments and contribute to strengthening professional capacities, at the local level municipalities envisage similar activities through the formation of working groups or other forms of cooperation. This indicates that some of the activities can already be carried out through inter-municipal cooperation, using existing local resources as a transitional solution, up to the full establishment of a functioning regional waste management system. In some cases, such an approach can be developed into a durable solution, especially if it demonstrates the necessary benefits, efficiency, and sustainability.

Overall, the analysis suggests that the potential for inter-municipal cooperation is considerable, but fully exploiting it requires clearly defined priorities, better capacity assessment, direct communication and coordination between the municipalities of the two regions, and stable political support. These preconditions will allow for the gradual but sustainable establishment of collaborations that will support the development of a functioning regional waste management system.

# 6. ANALYSIS OF ESTABLISHED COOPERATION IN THE FIELD OF ENVIRONMENT AND UTILITIES IN THE PERIOD FROM 2013 TO 2025

Based on the data from the records of inter-municipal cooperation kept by the Ministry of Local Self-Government, a total of 96 inter-municipal cooperation were established in the period from 2013 to 2025. It is the obligation of the municipalities to notify the Ministry of any established cooperation and to submit the acts by which it has been formalized. Of the total number of registered collaborations, only 18 relate to the area of environment and communal activities, indicating that these areas continue to be underutilised to establish functional and sustainable models of inter-municipal cooperation.

It is particularly noteworthy that in the Pelagonia and South-West Planning Region 11 municipalities are involved in 9 inter-municipal cooperations, all established through contracts for the performance of certain works by one municipality for one or more others. According to the register, two of these collaborations state that they relate to the environment and utilities, but without specifying which specific services are the subject of the cooperation. In the remaining seven cases, cooperation concerns the provision of inspection supervision carried out by authorised environmental inspectors and municipal inspectors. A similar situation has been observed in other regions of the country, where in IMCt cases the subject of inter-municipal cooperation is inspection supervision.

Inspection supervision is a legal obligation of municipalities, but, according to the National Waste Management Plan 2021-2023, it currently has limited resources — at least one-third less than those needed to fully implement the mandates. It is expected that these resources will need to grow continuously, especially with the increase in the number of waste management installations and the strengthening of producer responsibility. Therefore, it is possible that the trend of establishing inter-municipal cooperation in the field of inspection supervision will continue, because by pooling capacities, municipalities can more easily fulfill their legal obligations.

In terms of waste management, although this area offers significant potential for the development of joint solutions and resource savings, no inter-municipal cooperation has been established to date. One reason can be traced back to the fact that waste management is already legally defined as mandatory inter-municipal cooperation through regional waste management schemes. Such a legal setting, rather than encouraging new initiatives, may seem demotivating for municipalities, since the regional governance framework already determines the mode and scope of cooperation. Additionally, the complexity of the system, the need for significant financial investments, and limited administrative capacities further reduce the willingness of municipalities to establish new, parallel forms of inter-municipal cooperation.

In general, past practice shows that municipalities are much more likely to opt for cooperation in areas with lower organizational and financial risk, such as inspection supervision through forms that do not require significant institutional change, than in strategic and capital-intensive waste management areas.

[i] European Charter of Local Self-Government - https://rm.coe.int/european-charter-for-local-self-government-english-version-pdf-a6-59-p/16807198a3?utm_source=chatgpt.com

[ii] Law on Inter-Municipal Cooperation – "Official Gazette of the Republic of Moldova", No. 79 of 24.06.2009

[iii] Law on Local Self-Government - "Official Gazette of the Republic of Moldova", No. 5 of 29.1.2002

[iv] Regulation on the Manner and Conditions of Operation of the Integrated Waste Disposal Network - Official Gazette of the Republic of Macedonia No 7/06

[v] Regulation on the Principles of Internal Organization of Public Administration Bodies - Consolidated Text (No. 19-5112/1, 29.08.2007)

[vi] Law on Public Procurement - "Official Gazette of the Republic of North Macedonia" No. 87/21

[vii] Law on Public Enterprises - Official Gazette of the Republic of Moldova, no. 38/96, 6/02, 40/03, 49/06