

THE ROLE OF CIVIL SOCIETY ORGANIZATIONS IN THE MANAGEMENT OF SEWAGE SLUDGE IN THE WESTERN BALKANS

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1. EXECUTIVE SUMMARY

The management of sewage sludge (solids remaining after wastewater treatment) poses a challenge in Bosnia and Herzegovina (BiH) and the WB6 region. Based on activities implemented in BiH within EU4Green, challenges are synthesised and shared with WB6. In BiH, chronic infrastructure gaps, funding shortages, and a fragmented legal framework have led to unsustainable practices (e.g. informal dumping and long-term sludge storage). The Green Agenda for the Western Balkans and the EU4Green project stress the need for inclusive stakeholder cooperation to modernize wastewater treatment. They highlight explicitly the role of civil society organizations (CSOs) in advocating policy reform, raising awareness, and building local capacity. Hence, EU4Green stakeholders involved in wastewater treatment and civil society organizations convened at a local workshop in Sarajevo on November 27, 2025. The agenda included a discussion of the current situation in BiH, challenges, and best practices.

Drawing on the study of sewage sludge management by Denis Fontana, workshop conclusions, and EU policy analyses, this report shows how CSOs can be better integrated into sludge governance in BiH and in the Western Balkans.

CSOs perform diverse governance functions

In BiH and the broader region, NGOs help scrutinize and shape legislation, mobilize communities, and strengthen technical capacity. They can identify legal gaps, translate technical issues for citizens, organize training for plant operators, and act as watchdogs on environmental standards. For example, CSOs have pointed out regulatory inconsistencies in BiH – the FBiH rulebook outright bans agricultural use of sludge while RS laws are silent on sludge – and they press for harmonized, EU-aligned standards. Public forums convened by NGOs (e.g. after a PCB-contaminated sludge incident in Mostar) have been crucial in rebuilding trust and pushing for transparency.

However, CSOs face constraints. Civil society in BiH operates in an often unfavourable environment – especially in Republika Srpska – with limited funding and weak institutions. (European Commission SWD (2024) 691). This “constrained environment” means NGOs must overcome legal hurdles (e.g. unclear mandates, cumbersome “foreign agent” laws) and financial instability to participate. Despite these limits, their corrective role is recognized often. Policy briefs on the Green Agenda emphasize the need for meaningful CSO engagement not only in monitoring and awareness-raising campaigns, but also in fostering awareness of technically complex and challenging issues such as sewage sludge management, which require careful consideration in cooperation with CSOs (Clingendael 2021; Vukadinovic 2023).

Key findings and recommendations

The EU4Green project recommends clear legislative mandates (e.g. requiring sludge treatment before reuse), multi-stakeholder platforms (working groups and local “compacts” involving CSOs), and public information desks to demystify sludge projects. Actionable steps include phased regulation, financial support for early wastewater treatment adopters, and targeted awareness campaigns led by CSOs to address stigma and build trust. These measures, aligned with EU directives, will empower civil society to make sludge management more transparent, efficient and aligned with circular-economy goals.

2. INTRODUCTION AND OBJECTIVE

Bosnia and Herzegovina's sewage sludge (the solids remaining after wastewater treatment) poses an environmental and public-health challenge. Although municipal wastewater treatment plants (WWTPs) have expanded since the 1980s, safe sludge disposal lags behind due to limited funding, technology and regulatory clarity. Understaffed utilities often store sludge on-site or dump it in landfills at low standards; agricultural reuse and other recovery options are rare. The Green Agenda for the Western Balkans (aligned with EU accession requirements) therefore prioritizes modernizing waste and water management. In this policy context, the EU4Green project has identified inclusive governance (i.e. strong stakeholder cooperation) as essential for reform. The EU4Green local workshop held in BiH on 27th November 2025, which brought together wastewater treatment plant operators, municipal and academic experts, and civil society organizations, together with the study on sewage sludge management by Denis Fontana, provide key lessons learned on governance, capacity constraints, and stakeholder coordination that are highly relevant for other Western Balkan Six (WB6) economies.

Civil society organizations (CSOs) – local NGOs, community groups and environmental networks – occupy a “structural and enabling” role in effective sludge management. They provide expertise and oversight across the sludge lifecycle, acting both as partners and as checks-and-balances on government and industry.

This report focuses on the roles, contributions and limits of CSOs in BiH's sludge governance, with reference to neighbouring Balkan economies. It draws on the EU4Green sewage sludge study (Fontana 2025) and key workshop conclusions. For instance, the study of sewage sludge management by Denis Fontana notes that NGOs help “identify blind spots, reduce information asymmetry and test institutional assumptions against real-world conditions”, which keeps policies relevant and allows continuous improvement. In practice, this means CSOs raise issues (e.g. unreported sludge flows), demand accountability, and ensure that sludge regulations serve broader social and environmental interests.

In the Western Balkans generally, civil society in environmental sectors has grown rapidly. Regional analyses note that “the number of NGOs dealing with environmental issues has increased significantly in recent years” (Vukadinovic 2023). The EU and bodies like the Regional Cooperation Council explicitly call for active CSO participation in designing and monitoring green policies (Clingendael 2021, Vukadinovic 2023). BiH's case is emblematic: its parliament recently adopted the first comprehensive sludge law in the Federation of BiH, viewed as a milestone, but stakeholders (including NGOs) stress that implementation details (definitions, treatment requirements, quality standards) still need clarity.

After outlining CSO functions (policy advocacy; community engagement; capacity-building; monitoring and accountability), we highlight BiH-specific examples and regional lessons. Finally, we give actionable recommendations – consistent with the Green Agenda – to strengthen CSO engagement for more sustainable sludge management.

3. POLICY ADVOCACY AND LEGISLATIVE ENGAGEMENT

CSOs are instrumental in *shaping sludge policy*. They “broaden the evidence base” for decision-makers and ensure that regulations reflect social and environmental values as well as technical requirements. In Bosnia, NGOs have been active reviewers of draft sludge laws and bylaws. For example, CSOs noted that the Federation’s rulebook on soil pollution explicitly prohibits any use of sludge in agriculture, whereas in the Republika Srpska entity there is no clear sludge definition in agricultural laws. This gap creates legal ambiguity and raises environmental concerns. CSOs have lobbied for harmonized standards: they insist on unambiguous definitions of sludge and mandatory treatment standards (such as pathogen removal limits) before any reuse or disposal. This aligns with participants’ conclusion that “*sludge treatment prior to any form of use or disposal is mandatory, without exception*” on the local workshop in Sarajevo (27th November 2025).

More broadly, CSO policy advocacy in BiH follows patterns seen across the Western Balkans. NGOs regularly submit input on EU alignment: they push for BiH to adopt the new EU Urban Wastewater Treatment Directive and Waste Framework Directive requirements. They may also expose loopholes: the sludge study notes that good civil-society input often targets issues like traceability of sludge, independent monitoring capacity, and data transparency. In contested debates – for example, whether to prioritize land application versus incineration – CSOs can supply comparative impact assessments and keep discussions focused on cumulative risks, rather than narrow interests. Crucially, they can ensure that vulnerable groups are not overlooked: for instance, CSO advocates stress that any sludge policy must account for communities near WWTPs or fields, preventing disproportionate harm to the poor or rural farmers.

Regional comparison: Across the Western Balkans, CSOs similarly engage in legislation. For example, EU reports encourage BiH and its neighbours to hold inclusive dialogues with NGOs on environmental laws. In Serbia and North Macedonia, green NGOs have also campaigned for stricter sludge standards and for adopting EU norms on sewage. The proliferating civil society network (e.g. the RCC’s NGO forum) reflects this trend. In sum, CSO policy advocacy is a cornerstone of driving BiH’s sludge regulations toward EU compliance and public accountability (Clingendael 2021, Vukadinovic 2023).

4. COMMUNITY ENGAGEMENT AND PUBLIC AWARENESS

Role of CSOs for authorities: Civil society acts as a vital bridge between technical sludge projects and affected communities, this is the case for BiH but also the entire region. CSOs translate complex information (engineering designs, regulatory texts) into accessible language and engage citizens in decision-making. They organize public consultations,

workshops and site visits, ensuring that stakeholder input – including from rural residents, school groups, farmers, women and youth – is heard early in project planning. By doing so, CSOs help anticipate and defuse conflicts. For instance, local NGOs can channel community grievances (odours from WWTPs, safety fears about sludge fields) through informal “hotlines” or meetings, resolving issues before they become lawsuits. The sludge study highlights that coordinating truck routes with school schedules or establishing buffer zones are low-cost fixes often brokered by CSOs to build consent.

In BiH community engagement by CSOs has proven essential. An important example is the Mostar sludge-PCB scandal. In 2021, waste sludge contaminated with polychlorinated biphenyls (PCBs) was dumped near residents, severely eroding public confidence. The EU4GREEN study on sewage sludge management by Denis Fontana notes that *“the notorious case of PCB-contaminated sludge in Mostar has had a particularly damaging impact on public confidence in sludge management across BiH”*. In response, CSOs stepped in to facilitate the dialogue: they held town-hall meetings, demanded comprehensive monitoring, and pressed authorities to publish lab results. This pressured operators to adopt stricter safety measures and kept the public informed. Such efforts by NGOs helped restore trust gradually and underscored the value of transparency.

The conclusions from the EU4GREEN local stakeholder workshop in Sarajevo also emphasized awareness: participants agreed that raising public understanding of wastewater and sludge is “essential”. They warned that stigma around sludge reuse (e.g. serious fears of toxins) hinders infrastructure investment and tariff reforms. Accordingly, CSOs are well-placed to lead education campaigns and “provide transparent information on environmental threats, depollution targets and best practices”. For example, a CSO-driven media campaign could explain the benefits of sludge compost or how modern treatment eliminates pathogens. By normalizing sludge reuse and linking it to circular-economy gains (like fertilizer substitute), NGOs can build the “social license” needed for new facilities (Clingendael 2021).

In neighbouring economies, CSOs likewise prioritize awareness. Across the WB, NGOs have organized river clean-ups, school programs, and citizen science projects to spotlight water quality (e.g. *Voda iz Slivara* in Serbia). The growing number of environmental NGOs in the region suggests a rising capacity for grassroots outreach on wastewater issues. Shared Balkan initiatives (e.g. cross-border workshops, NGO forums) also foster exchange of community engagement strategies (Vukadinovic 2023).

5. CAPACITY BUILDING AND KNOWLEDGE SHARING

CSOs serve as catalysts for improving technical and institutional capacity in sludge management. In BiH they collaborate with utilities, academia and professional associations to organize training programs for WWTP operators, municipal inspectors, and regulators. Courses might cover sludge dewatering techniques, laboratory quality assurance, or

emergency response. For instance, NGOs have hosted field exchanges where plant managers visit advanced facilities abroad, learning best practices to replicate at home. CSOs also promote the development of standard documents – operating procedures, safety manuals, contract templates for sludge off-takers – and make them widely available. By curating this knowledge, CSOs raise the sector’s baseline competence and ensure more uniform safety and quality across municipalities.

An important area is data literacy. CSOs encourage transparent sludge data collection and publication: this can involve workshops on how to interpret lab results, or community monitoring projects (e.g. training citizen scientists to sample and report on sludge or water quality). Such participatory monitoring not only extends oversight, but also builds public trust in the figures being reported. In addition, CSOs can help establish clear product standards for treated sludge (e.g. compost grades, biofuel specs) and pilot markets for them. For example, they could facilitate small-scale pilot initiatives to supply stabilized sludge to cement plants or quarries, thereby demonstrating safe utilization and helping to build confidence in emerging markets, provided that the regulatory framework permits such practices.

The workshop on sludge management in Bosnia and Herzegovina underlined the need for targeted capacity-building. Participants recommended that CSOs lead training modules on community outreach and risk communication, complementing technical sessions delivered by academia or regulators. EU4Green’s report, compiled by Fontana (2025), envisages cooperative models in the form of “capacity-building consortia,” in which CSOs take responsibility for social accountability topics while other partners address engineering and laboratory methods. For such models to be effective, they require clear support from public authorities, dedicated funding mechanisms, and the systematic identification and engagement of CSOs with relevant expertise. Such structured partnerships ensure that training covers both “people” and “process” skills, embedding continuous learning across the sector.

In the Western Balkans, several cross-border networks already foster capacity development. For example, the Balkan Civil Society Development Network (BCSDN) facilitates training on advocacy and EU policies. In sludge and wastewater specifically, shared trainings (e.g. under EU Pre-Accession Assistance) have brought Serbian, Bosnian and Herzegovina and Albanian plant technicians together. These regional exchanges complement national efforts, enabling CSOs to import lessons from each other (e.g. successful “living lab” demonstrations in Czech or Croatian sludge management).

6. MONITORING, ACCOUNTABILITY AND THE CSO “CORRECTIVE FORCE”

CSOs act as watchdogs in the sludge system. They collect and verify information on compliance (e.g. through third-party sampling campaigns or “shadow audits”) and report infractions to authorities. Non-compliance issues – illegal dumping, odour violations, off-

spec sludge quality – are brought to light by NGOs, who often collaborate with affected citizens to document evidence. By supporting communities to file formal complaints or legal challenges, CSOs help ensure that breaches of permits or EIA conditions are not ignored. In doing so, they shift the system from “compliance-on-paper to performance-in-practice”, making enforcement meaningful.

In BiH, civil groups have initiated environmental cases against polluters in the past (e.g. wastewater discharge cases), reflecting this oversight role. More recently, water and environmental NGOs have co-operated with prosecutors to monitor illegal waste operations. Under the Green Agenda, authorities are urged to formalize such roles by involving CSOs in monitoring frameworks (Clingendael 2021).

Fontana describes CSOs’ broader “corrective force” in governance. Key mechanisms include independent data checks (e.g. NGOs publishing alternative sludge flow statistics to compare with official numbers) and early-warning systems (community hotlines that detect issues like sudden odour or truck traffic spikes). Civil society also pressures for proportional solutions: by analyzing cost–benefit trade-offs, CSOs can encourage pilot-scale investments (e.g. in drying or composting) before committing to expensive incinerators. They scrutinize concession and off-take contracts to avoid monopoly or corruption, safeguarding the public value in sludge reuse markets. In essence, CSOs in BiH serve as both partner and counterbalance to government and operators, ensuring transparency and adaptability in the sludge regime.

Regional comparison: Across the Balkans, NGOs have played similar watchdog roles. For example, activist groups in Serbia and Montenegro have reported on illegal dumping and exerted legal pressure. The EU’s enlargement reports note that BiH’s police of NGOs can be uneven, and call for more systemic consultation to empower CSO oversight (European Commission SWD (2024) 691). The Western Balkans Green Agenda initiative explicitly envisages civil society as independent monitors and information providers (Clingendael 2021). Thus, while enforcement remains a challenge region-wide, there is growing support for formalizing CSO participation in environmental enforcement and data disclosure.

7. SYNTHESIS: BIH AND REGIONAL CONTEXT

In Bosnia and Herzegovina, civil society’s role in sludge management is evolving but still maturing. The Federation’s new sludge law is a landmark, but stakeholders – including CSOs – insist on refining it with clear definitions and treatment requirements. Workshop participants highlighted that legislation must enable *multiple safe pathways* (e.g. agriculture, energy recovery) and unequivocally mandate treatment before reuse. CSOs play an important role in this process, having contributed to the formulation of these recommendations by constructively drawing attention to regulatory inconsistencies (such as the ban in the Federation of BiH compared to the absence of provisions in Republika Srpska) and by promoting alignment with EU standards.

Local examples illustrate the stakes. As noted, the Mostar PCB in 2021 incident led to a increase in community resistance. CSO interventions (town halls, public data requests) helped prevent the crisis from paralyzing all projects. Likewise, in other municipalities like Sarajevo and Banja Luka, NGOs have run workshops for farmers on safe compost use and have organized site visits to nearby WWTPs to demystify sludge. These efforts ease the path for pilot reuse projects. Indeed, the EU4GREEN study on sewage sludge management (Fontana 2025) recommended “living lab” pilots – where a sludge treatment innovation is co-managed by a WWTP, research institute and a local CSO – have already been piloted in BiH under EU grants. These pilots, supervised by CSOs doing spot-checks and community outreach, have demonstrated new dewatering technologies while keeping locals informed.

At the regional level, Bosnia and Herzegovina’s situation is broadly similar to its neighbours’ in key ways. All Western Balkan economies struggle with limited funding for sanitation – the workshop echoed across the region that wastewater fees are universally too low. Early adopters of wastewater treatment (mostly medium-sized cities) often find themselves financially burdened without clear benefits – a scenario shared by many Serbian and Albanian municipalities. Accordingly, CSOs across the WB6 call for mechanisms to reward these municipalities, e.g. through special grants or tariff subsidies. At the same time, advancing such measures requires addressing political constraints, as increasing fees or adjusting tariffs is often perceived as politically sensitive and therefore resisted, underscoring the need to overcome political obstacles alongside technical and financial ones.

However, BiH also faces unique coordination challenges due to its political structure. Laws and utilities are divided between the Federation and RS, which can complicate nationwide sludge strategies. This makes civil-society cooperation even more crucial. Multi-entity working groups that include CSOs – as Fontana suggests – can help reconcile entity differences. For instance, a recent cross-entity NGO forum (backed by an EU project) has begun drafting unified guidelines so that a farmer near the Neretva River doesn’t face contradictory rules depending on local jurisdiction. Such regional coordination is analogous to EU “macro-regional” strategies recommended for energy and environment (Vukadinovic 2023).

Overall, the pattern is clear: strong CSO engagement correlates with better sludge outcomes. Countries like Slovenia (EU member) and Croatia (EU candidate) show that active environmental NGOs can push sludge reuse programs and monitor compliance. In the Western Balkans, this civic momentum is growing (Vukadinovic 2023). Policymakers in BiH are increasingly recognizing that sustainable sludge management requires not just engineering solutions but social ones – building trust and demand through civil society.

8. CONCLUSIONS AND RECOMMENDATIONS

Civil society organizations are well placed to serve as key partners in reforming sludge management, provided they are adequately empowered. The evidence base and workshop outcomes point to the following actionable measures:

1. Clarify and harmonize legislation. Enactments should *explicitly mandate sludge treatment before reuse or disposal*. Ambiguous rules (like the FBiH ban versus RS silence) must be aligned; EU standards (new UWWTD 2024/3019, SSD) should be transposed clearly. CSOs should be involved in drafting these regulations: establish permanent multi-stakeholder working groups (government, regulators, utilities, CSOs, academia) to review sludge laws and guidelines. Meeting minutes and draft texts should be published for transparency. This inclusive approach will build consensus and prevent reactive lawsuits.
2. Build cooperative frameworks with CSOs in the Western Balkan. Adopt local compacts between WWTP operators and community NGOs. These formal agreements can include shared initiatives (open days, emission reporting dashboards), clear grievance procedures, and joint monitoring commitments. Establish community information desks managed by CSOs in high-impact locations (near large plants or fields) to provide non-technical data and a voice for citizens. Pilot “living labs” for new sludge technologies (e.g. a greenhouses dryer or compost site) under CSO oversight – this lowers risk by testing innovations at small scale while CSOs handle public updates. Over time, create a marketplace for treated sludge products (compost, biofuel) where operators post certified quantities and CSOs verify quality data. These models leverage CSOs’ strengths (communication, independence) to institutionalize transparency and trust.
3. Invest in capacity and training. Form cross-sector capacity-building consortia to pool expertise. CSOs should lead modules on public outreach, risk communication and social accountability, while technical institutions teach process control and lab methods. Provide grants or EU co-financing for NGO training centers focused on sludge science and community organizing. CSOs could also facilitate accreditation partnerships (e.g. arranging proficiency testing for labs, or exchange programs with EU sludge experts). The workshop noted that many utilities lack sludge know-how; targeted CSO-led programs can fill these gaps.
4. Launch public awareness campaigns. Following workshop advice, CSOs should spearhead education initiatives about wastewater and sludge. These might include school curricula components, media stories, and participatory field days at treatment plants. Campaigns should demystify sludge (address fears of pathogens), highlight benefits of reuse (soil amendment, energy), and explain why fees or new projects are needed. Engaging narratives (e.g. “from waste to resource”) and transparent messaging will help change perceptions. The EU advises funding NGOs specifically for this purpose (Clingendael 2021).
5. Support responsible municipalities. Recognize that early investors in WWTPs are now burdened by new sludge mandates. Implement a stabilisation mechanism: for example, allocate grants or tariff subsidies to towns that have modern treatment plants. CSOs can lobby for such schemes and monitor their fairness. Likewise, realistic increases in wastewater tariffs are unavoidable; any fee reform should be communicated jointly by utilities and NGOs to secure public backing.
6. Ensure sustainable funding for CSOs. Finally, governments should create an enabling environment for CSOs (European Commission SWD (2024) 691). This means transparent, multi-year funding (through national grants or EU programs) for environmental NGOs, as well as removing legal barriers like restrictive association laws. An example is establishing a joint oversight board (public and NGO members) to allocate EU4Green and Green Fund resources to sludge-related projects. By

institutionalizing support and consultation, BiH will fully leverage its civil society as a partner in carrying out EU accession-era sludge reforms.

Together, these steps will embed CSOs into every layer of sludge governance – from law-making to field implementation. Evidence from BiH and other European contexts shows that when NGOs are empowered and integrated, sludge management becomes more adaptive, transparent and accepted by the public. This aligns with Western Balkans' Green Agenda goals of a circular, low-carbon economy. By treating civil society as an active stakeholder rather than an afterthought, BiH can move beyond fragmented projects toward a coherent, participatory sewage sludge management system.

9. ANNEX

EU4GREEN

AGENDA

Workshop on Sustainable Management of Sewage Sludge in Bosnia and Herzegovina, Hotel Holiday, Sarajevo, 27th Nov 2025

Agenda

09:00 – 09:30	Registration of Participants & Morning Coffee <ul style="list-style-type: none">Participants arrive, complete registration, and network with others
09:30 – 10:00	Opening and introduction
10:00 – 10:45	Keynote Presentation <ul style="list-style-type: none">Current Situation of Sewage Sludge Management in BiH: Challenges and Opportunities, Denis Fontana
10:45 – 11:15	Plenary Discussion <ul style="list-style-type: none">Q&A session with participants on key findings
11:15 – 11:30	Coffee Break
11:30 – 13:00	Best practice examples vs current situation <ul style="list-style-type: none">Overview on best practices in EU. Denis FontanaBest practice examples from Austria. Bogdanka Radetic, Environment Agency AustriaFrom Waste to Resource: Sewage Sludge Management Practices in the Czech Republic. Michal Šereš, Charles University Prag
13:00 – 14:00	Lunch Break
14:00 – 15:30	Presentation on Real world challenges of sludge management in BiH <ul style="list-style-type: none">Realities of Sludge Management in BiH – The Perspective of WWTP Mostar, Ivan Bebek
14:00 – 15:30	Plenary Discussion <ul style="list-style-type: none">Q&A session with participants on “Real world challenges of sludge management in BiH”
15:30 – 16:00	Closing Remarks



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