

Using the EU Environmental Permitting Framework to Promote the Energy Transition in the Western Balkans – The Case of Kosovo

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Abstract Kosovo's electricity generation is dominated by lignite-fired power plants, resulting in high greenhouse gas emissions and limited integration of renewable energy sources (RES). Despite national strategies aimed at increasing the share of RES and Battery Energy Storage Systems (BESS), administrative, technical, and regulatory barriers hinder progress. In this context, aligning Kosovo's permitting framework with established EU environmental legislation offers a structured pathway to accelerate its energy transition. This paper presents key findings from a recent technical assistance project implemented for the Ministry of Environment, Spatial Planning and Infrastructure (MESPI), which produced a Permitting Support Manual for RES and BESS projects and a Supplementary Guidance Document. These tools identified context-specific barriers and proposed practical institutional and procedural reforms based on EU best practices. The study concludes that implementing standardized screening criteria, integrating spatial planning for RES and BESS, and streamlining administrative procedures are critical to advancing Kosovo's decarbonization efforts.

Keywords: Environmental Permitting, Renewable Energy, Kosovo, Spatial Planning, RED III

1. Introduction

The Republic of Kosovo remains heavily reliant on lignite, with over 90% of electricity generated from two aging thermal power plants (Di Bella & Thaci, 2023). Although national energy strategy emphasizes the integration of RES such as solar, wind, and battery storage (Government of the Republic of Kosovo, 2023), progress has been limited (European Commission, 2024a). As a candidate country for EU accession, Kosovo has committed to aligning with the EU environmental acquis (Energy Community Secretariat, 2024). The permitting process for RES and BESS plays a central role in enabling the country's energy transition and reducing dependence on fossil fuels. Recognizing this, a technical assistance project was implemented to support MESPI in enhancing its permitting procedures in line with EU developments, including Environmental Impact Assessment (EIA) Directive (EU)

2014/52, Renewable Energy Directive (EU) 2023/2413 (RED III) and EC Recommendation 2024/1343 on accelerating permit-granting processes for renewable energy projects.

2. Key Barriers to Permitting for RES and BESS

A review of existing literature (Kalčiček et al., 2024) combined mostly with insights gathered from stakeholder consultations in Kosovo revealed a series of persistent barriers that hinder the effective permitting of RES and BESS. The permitting process remains complex and fragmented due to overlapping institutional responsibilities and the absence of standardized procedures. This also introduces additional obstacles for adequate funding from international donors, such as the World Bank, EBRD, etc., which this kind of project typically relies on. Kosovo also lacks comprehensive spatial planning instruments, including designated zones for RES deployment, which restricts investment certainty and delays project initiation. Permitting authorities often operate with limited staff and inadequate technical training, leading to procedural bottlenecks and inconsistent evaluations. Environmental concerns, especially regarding impacts on biodiversity and protected areas, are not always addressed through robust, science-based assessments. Technical uncertainties, particularly surrounding BESS technologies, introduce additional complexity due to evolving international standards and a lack of domestic regulatory guidance. These challenges are not unique to Kosovo but reflect a broader pattern among energy systems transitioning from fossil fuel-based infrastructures to variable renewable energy generation (European Commission, 2024b; Energy Transitions Commission, 2023; Banet & Donati, 2024; Dossche, Orhan & Szabo, 2023).

3. Permitting Support in Kosovo: Tools and Recommendations

In response to these challenges, a comprehensive Permitting Support Manual and a Supplementary Best

Practices Document based on existing literature (Wingenbach et al., 2024; European Commission, 2024b; Energy Transitions Commission, 2023; Banet & Donati, 2024; Dossche, Orhan & Szabo, 2023) were developed under a targeted technical assistance project. These tools were designed to support Kosovo's MESPI by aligning national permitting practices with relevant EU legislation. The recommendations were informed by both regulatory analysis and sustained dialogue with institutional stakeholders and aimed at enhancing procedural clarity, institutional coordination, and regulatory consistency. A critical tool along this effort was the experience of EU and, particularly, of Greece, which, as an EU member state, has shown satisfactory environmental permitting performance of RES and BESS projects.

Central to this effort was the integration of spatial planning as a core pillar of permitting, including the proposal to establish Renewable Acceleration Areas (RAA), a policymaking tool that has been recommended by RED III (EU) 2023/2413, through strategic planning and environmental assessment. The manual also advocates standardized screening thresholds to ensure transparent and proportional project evaluation. The Greek experience, where projects are being divided into A1 (very significant impacts), A2 (significant impacts), and B (insignificant and local impacts) groups, might be useful in this regard, where a standard table with screening criteria has enforced the expedition and the clarity of the procedure. A scoping study, although has withdrawn from the national legislation of Kosovo, could be a very useful tool for those RES and BESS projects that are expected to have significant environmental and social impacts and/or seeking international financing. Moreover, a standardized Table of Contents (ToC) for Environmental Impact Assessments (EIA) and Appropriate Assessment Studies (for projects that may affect protected areas). Moreover, a standard table of contents at least for RES and BESS projects, that can be enforced with a new Administrative

Instruction, may also facilitate the assessment and EIA evaluation procedure by the authorities. Furthermore, a

standard list of the statutory consultees and the introduction of an EIA review checklists would support a more consistent and efficient review process. Minor design changes not affecting impact significance must be accommodated without restarting the environmental permitting procedure. A one-stop-shop digital platform and the integration of all related environmental permits within the EIA process are vital for procedural efficiency.

Finally, the EIA scope must focus strictly on significant environmental and social impacts, while a "positive silence" rule during statutory consultations could reduce delays.

4. Conclusions

Kosovo's pathway to decarbonization depends not only on policy ambition and investment but on the establishment of an efficient, transparent, and fit-for-purpose environmental permitting system. Grounded in EU directives and tailored to the specific administrative and technical realities of Kosovo, the tools produced through this technical assistance project, serve as practical, guiding frameworks for reform. Implementation will require sustained effort, capacity-building and inter-institutional coordination. To maximize their effectiveness, these reforms should be informed by international experience, particularly from EU Member States, such as Greece, which has made progress in streamlining its overall environmental permitting system. Drawing on such experience can support the development of efficient procedures in Kosovo, reinforcing transparency and alignment with EU environmental standards. Ultimately, this will contribute to unlocking investments and advancing the country's transition to a low-carbon energy system.

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