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**Guidelines for including informal waste
pickers into local action plans for social
inclusion of Roma**

GUIDELINES FOR INCLUDING INFORMAL WASTE PICKERS INTO LOCAL ACTION PLANS FOR SOCIAL INCLUSION OF ROMA



March 2025

The production of this publication was supported by the Government of Switzerland within the Programme "PRO - Local Governance for People and Nature", which is jointly implemented by the United Nations Agencies in Serbia - UNOPS, UNICEF, UNFPA and UNEP, in cooperation with the Government of the Republic of Serbia. The contents are the sole responsibility of UNOPS, which does not necessarily represent the official stand-points of the Swiss Government, Serbian Government or UN agencies.



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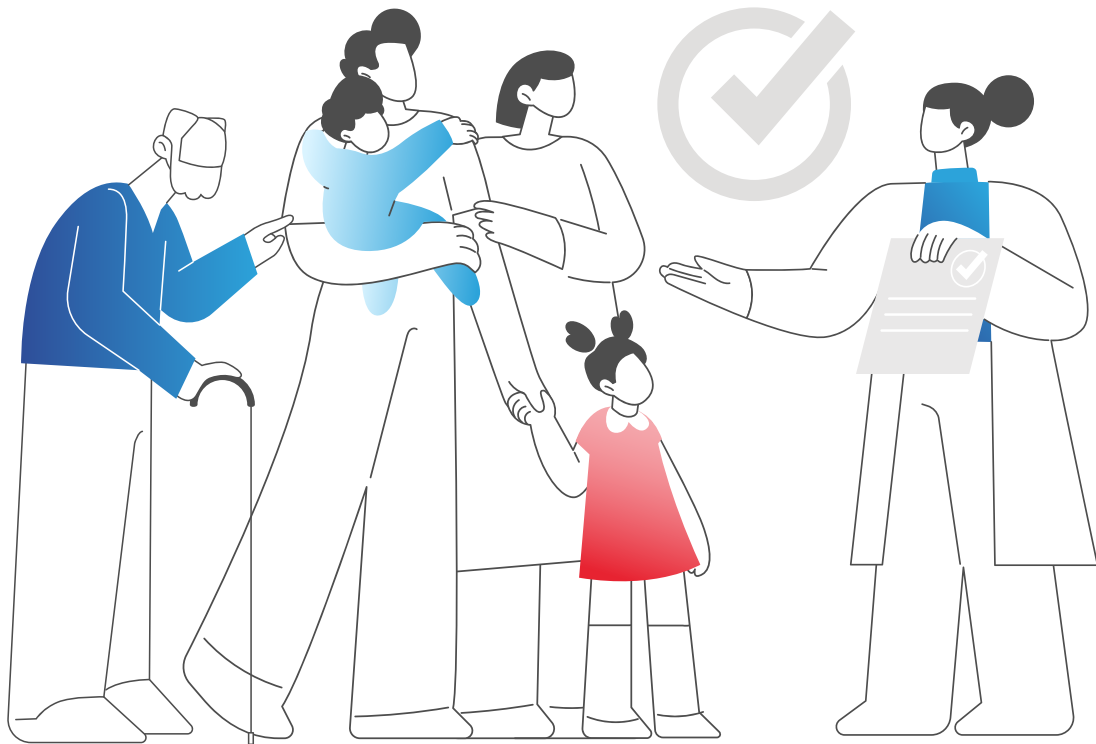


List of Abbreviations

APV	Autonomous Province of Vojvodina
EBRD	European Bank for Reconstruction and Development
ESP/PR5	2019 Environmental and Social Policy, Performance Requirement 5
EU	European Union
FPAE	Functional Primary Adult Education
YO AWP	Youth Office Annual Work Plan
IPA	Instrument for Pre-accession Assistance
PUC	Public utility company
LSG	Local self-government unit
OSS	One-stop shop
LEDO	Local Economic Development Office
KPMG	The firm that provides audit, tax, and financial advisory services
LAP	Local action plan
LWMP	Local waste management plan
MEP	Ministry of Environmental Protection
LARF	Land Acquisition and Resettlement Framework
PCM	Project Complaint Mechanism
PRs	Performance Requirements
PRO Programme	Local Governance for People and Nature
RWMP	Regional Waste Management Plan
RS	Republic of Serbia
RSL	Regional sanitary landfill
RWMC	Regional waste management centre
SL	Sanitary landfill
SCTM	Standing Conference of Towns and Municipalities
COPD	Chronic Obstructive Pulmonary Disease

1. INTRODUCTION

Technical assistance for capacity building provided to local self-government units (LSGs) under the programme „**PRO - Local Governance for People and Nature**“ (PRO Programme), which is jointly implemented by the United Nations organisations in Serbia - UNOPS, UNICEF, UNFPA and UNEP, in cooperation with the Serbian Government, and with the financial support of the Government of Switzerland, lends systemic support for improving the socio-economic status of informal waste pickers.



This document has been prepared as part of technical assistance, based on requests by representatives of cities and municipalities supported under the PRO programme.

The aim of the document is to put forward proposals for establishing systemic support to informal waste pickers in the territory of cities and municipalities in Serbia, including both the households mapped under the PRO programme, and those not mapped but falling within this category, through the Roma Social Inclusion Local Action Plans (LAPs).



2. SOCIAL INCLUSION of Roma in Serbia

On 3 March 2016, the Government of the Republic of Serbia, at the proposal of the Ministry of Labor, Employment, Veteran and Social Affairs, adopted the Strategy for Social Inclusion of Roma in the Republic of Serbia covering the period from 2016 to 2025, while at the proposal of the Ministry of Human and Minority Rights and Social Dialogue, and with a view to revising and improving the national strategic document in line with new trends, it has adopted the proposed – [Strategy for Social Inclusion of Roma in the Republic of Serbia 2022-2030](#).

The national-level [Coordination Body](#) is tasked with monitoring all the processes related to the social inclusion of the Roma. Its role is to coordinate the work of public authorities, LSGs, public enterprises and other participants involved in this area. The Coordination Body is also responsible for improving interdepartmental cooperation and making recommendations for the implementation of prescribed measures and additional activities that contribute to the social inclusion of Roma. The Coordination Body is chaired by the Prime Minister.

At the local level, the counterparts to the national Coordination Body are Mobile Teams for Social Inclusion of Roma (Mobile Team), which play a similar role.

These teams are generally chaired by Coordinators for Roma Issues, who are also delegated by LSGs as members of the [SCTM Network for Roma Issues](#) and, where relevant, of the [Roma Inclusion Office of AP Vojvodina](#).

The above mechanisms, including the Mobile Team as such, are underused in addressing all issues of the Roma population, especially housing, being also the most expensive to be addressed.

3. WASTE MANAGEMENT in Serbia

The bulk of municipal waste in the Republic of Serbia is deposited into landfills, which should be the last solution in the waste management hierarchy, after waste prevention, waste reuse, recycling, and other types of waste recovery.

The most recent estimate by the Environmental Protection Agency shows that approximately 15% (17.7% in 2022) of the generated municipal waste produced in the Republic of Serbia is recycled on an annual basis, with LSGs contributing with no more than 3%, and all other recycled quantities coming from the private sector. The level of municipal waste recycling is directly correlated to the activities and organization of the waste management system regulated by LSGs and implemented by Public Utility Companies (PUCs). The percentage of recycling of 3% is disproportionately low compared to the capacities and potential of LSGs and PUCs, and the main reason is that the vast majority of LSGs have not introduced a system of primary waste selection.¹

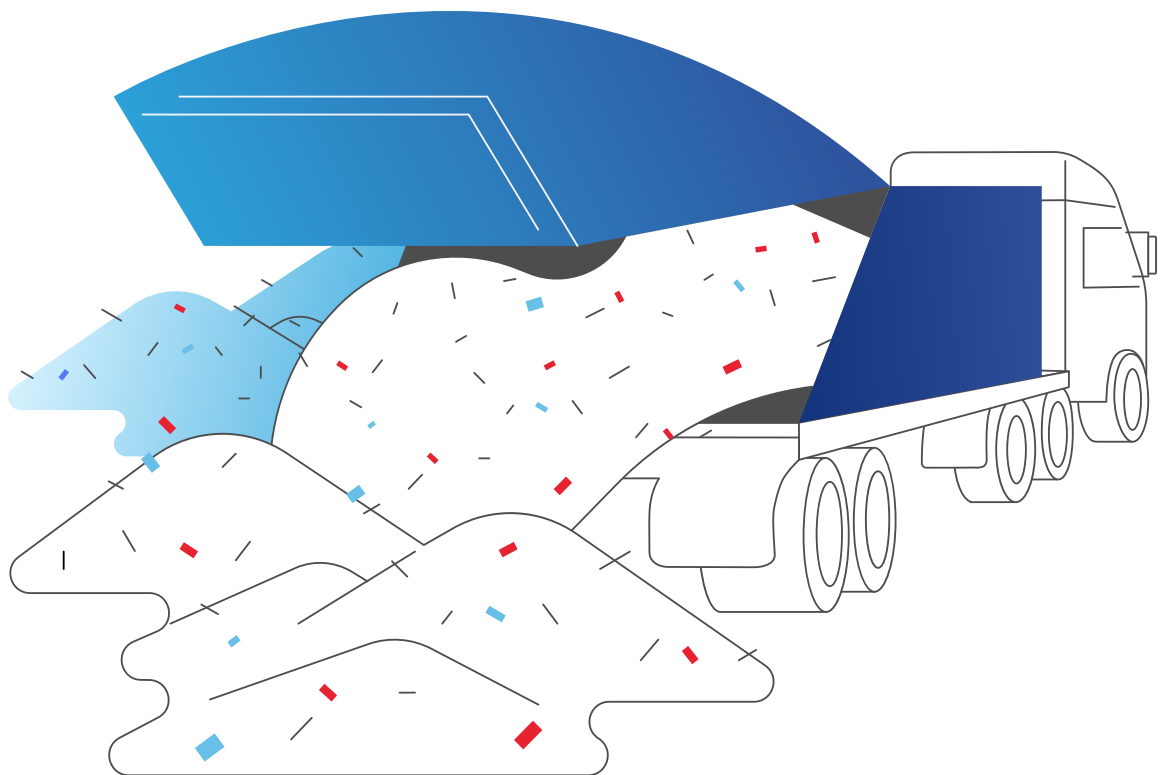


Table 1: Amount of waste deposited into sanitary landfills, in tons.²

Sanitary landfill	2015	2020	2023
1. RSL "Duboko" Užice	72,051	83,541	83,376
2. RSL "Vrbak" Lapovo	35,580	57,396	25,132
3. RSL Kikinda	54,008	37,478	24,592
4. RSL "Gigoš" Jagodina	62,760	69,042	78,297
5. RSL "Željkovac – D2" Leskovac	64,269	82,953	86,506
6. RSL "Muntina padina" Pirot	36,956	30,654	33,483
7. RSL "Jarak" Sremska Mitrovica	44,545	56,680	75,755
8. RSL Pančevo	/	76,225	30,420
9. SL "Meteris", Vranje	/	27,382	60,991
10. SL "Vušan" ³ , Gornji Milanovac	180	21,946	17,854
11. RSL Subotica	14,879	15,361	13,915
12. RSL "Vinča", Belgrade	/	/	671,359
TOTAL	385,228	558,658	1,201,683

As previously mentioned, 80% of waste recycling is carried out by the private sector, in which informal waste pickers, whose number in Serbia is estimated at not less than 25,000 people, mostly Roma, play a major role. They collect recyclable waste that would otherwise go uncollected, and thus inadvertently constitute an extremely important factor in environmental protection. Although not registered as employees, informal waste pickers are valuable and useful workers for LSGs. According to an estimate, if informal waste pickers stopped collecting waste for one day, the entire territory of Serbia would be covered by a layer of waste.

Informal waste pickers, however, live on the margins of society, on the verge of absolute poverty. Although they work both as individuals and as families, and often also receive social assistance, they do not have enough resources to cover basic living expenses and face challenges in all aspects of life: housing, health, education, etc.

² Ibid, page 11

³ Local sanitary landfill in the municipality of Gornji Milanovac

Informal waste pickers' **health** is particularly at risk, among other things due to the nature of their work – work without adequate protection, contact with harmful substances, inhalation of harmful gases, etc.

With regard to **housing**, besides other housing-related problems faced by other poor people as well, informal waste pickers often use part of their housing space to store recyclable waste, thus further endangering their environment and health.

Employment poses a particular challenge to informal waste pickers. They have specific knowledge and skills in terms of recognizing different types of waste and skills in collection, sorting, and the like. However, such knowledge and skills are not recognized in the labour market, and in most of the cases, they have an exceptionally low level of education, if any at all. Therefore, if they were to get a job, on the one hand they would work for minimum wages or less, while on the other hand they would lose any social assistance they could be receiving, and be potentially taxed in other ways, thus being pushed even deeper into poverty. It should also be borne in mind that waste collection is often a family activity, with women and children being particularly vulnerable in terms of health (especially pregnant women and babies), and children facing a particular challenge on top of that to get education in such circumstances, thus perpetuating the cycle of poverty.



4. SOCIAL INCLUSION of informal waste pickers

4.1 Legislative-legal Framework of the Republic of Serbia

The [Constitution](#) defines the Republic of Serbia as a state whose fundamental values include social justice, civil democracy, human and minority rights. National minorities enjoy special attention for the purpose of achieving full equality. The articles of the Constitution that guarantee dignity and personal development, encourage respect for differences, recognize the right of citizens to participate in the management of public affairs, the right to work, the right to special protection of the family, mother, single parent and child, health care and social protection and education are articles important for advancing the status of informal waste pickers.

In addition to relevant sectoral laws in the areas of education, health care, social protection, employment, housing, and prohibition of discrimination, when drafting LAPs for the inclusion of Roma, it is important to also keep in mind the following documents specifically related to issues concerning informal waste pickers.

The [Law on Waste Management](#) does not address the adverse impacts of waste management on people's lives; hence, there are no specific provisions prescribing measures to this effect. The only provision of this Law that has an impact on informal waste pickers, is the one in Article 70 of this Law, providing for the exemption of individual waste pickers from the obligation to obtain a waste collection permit, i.e., they can engage in this activity without a special permit. Therefore, this Law sets out an obligation pertaining to holders of office not to prohibit individuals from participating in the waste management process, including collection, transport and processing, provided that such waste is not harmful to them, others or the environment and that it is carried out on the territory of the local self-government.

Likewise, the Law on Waste Management also stipulates that regional waste management is to be accomplished through the development and implementation of regional strategic plans, which are based on European legislation and national policies. In the previous period, cities and municipalities where Regional Waste Management Centres (RWMCs) have already been established or will be established, with the support of the Ministry of Environmental Protection (MEP), have prepared regional waste management plans (to be discussed later). Land Acquisition and Resettlement Frameworks for the RWMCs and Stakeholder Engagement Plans have also been prepared. As part of these plans, a Project Complaint Mechanism (PCM) has been introduced, which has been established to assess and review complaints related to EBRD-financed projects. The PCM provides an opportunity for individuals, organizations and local groups adversely affected by a project to file a complaint with the Bank, independently of its banking activities.



Local self-government units are invited to update and align their local plans with the regional plans, as well as with the [EBRD's Environmental and Social Policy](#).⁴ In this manner, funds and measures should be planned to address the situation of the families engaged in informal waste collection.

On 17 December 2021, the Government of the Republic of Serbia adopted the [Law on the Ratification of the Loan Agreement for the Serbian Solid Waste Programme](#) between the Republic of Serbia and the European Bank for Reconstruction and Development (EBRD). It has legally confirmed all obligations arising from the Agreement, in keeping with the EBRD's Environmental and Social Policy and Performance Requirements (ESP and PRs)⁵, with the beneficiary of the programme being the MEP.

The **Solid Waste Programme** focuses on the development of regional waste management centres in 42 municipalities in Serbia. While it provides for the construction and operation of the centres, the programme also includes obligations related to addressing the social status of informal waste pickers, whose incomes are threatened by the modernization of waste management.

While local self-governments are expected to put in place measures for socio-economic support to families whose incomes will be affected by the opening of new regional recycling centres, the PRO programme provides additional support to both local self-governments and directly affected families of waste pickers.

Pursuant to this law, the Republic of Serbia is to receive loan proceeds for the improvement of the solid waste management system, while undertaking to „*Through the MEP, ensure that the Livelihood Restoration Plan (as defined in each Project Agreement) for a relevant part of the Project, as applicable, is developed and implemented in compliance with Bank's Environmental and Social Policy.*”

It sets out the principle that people and communities whose standard of living is negatively affected by the implementation of the Solid Waste Programme should be provided with the opportunity to restore their lost livelihoods, and calls for the concrete operationalisation of this principle at a lower level, i.e., at the level of individual projects. A specific project that relates to waste pickers in cities and municipalities and is part of the loan is the project for the establishment of Regional Waste Management Centres (RWMC).

In accordance with the above statutory obligation, a document in the form of a livelihood restoration plan has been prepared and in some cases adopted for RWMC projects, entitled **Land Acquisition and Resettlement Framework (LARF) for RWMC**.⁶ This document most closely specifies the obligations of cities and municipalities under the above-mentioned documents, especially the Law on the Ratification of the Loan Agreement for the Serbian Solid Waste Programme. Although the information about the situation on the ground regarding informal waste pickers was not available at the time of the preparation of this document, it nevertheless features more specific guidelines that must be taken into account when preparing local plans that affect informal waste pickers, namely, primarily the Local Action Plan for Social Inclusion of Roma and the Local Waste Management Plan, as well as plans related to employment, housing, education, etc.

Pursuant to the **Land Acquisition and Resettlement Frameworks for RWMCs**, primary waste selection does not exist in certain project areas, and in some rural areas there are not even containers for mixed

⁴ Document available in English.
⁵ The EBRD Environmental and Social Policy is available at [Environmental and Social Policy 2024](#), which has been in effect since 1 January 2025. It was preceded by the EBRD Environmental and Social Policy from 2019, which is available at [Environmental and Social Policy 2019](#).

⁶ Available documents for individual RWMCs include:
[Construction of the Regional Waste Management Centre Kalenić](#), the [Land Acquisition and Resettlement Framework Plan](#)
[Land Acquisition and Resettlement Framework for the RWMC Rančevo, Sombor](#)
[Land Acquisition and Resettlement Framework for the RWMC Banjica, Nova Varoš](#)
[Land Acquisition and Resettlement Framework for the RWMC Duboko, Užice](#)
For two RWMCs documents are not publicly available.

municipal waste. Certain documents directly recognize the fact that *"The simplest selection in most municipalities is performed by informal waste pickers of secondary raw materials (mainly Roma)."* The document assesses the impacts that the RWMC project will have. It sets forth, among other things, that one of the impacts is the "economic displacement" in various ways, including "the inability to continue with waste picking on non-regulated landfills," which constitutes a negative impact on the livelihoods of those who make a living on this activity.

In the construction phase of the RWMCs, it is envisaged that the project(s) will have a positive effect on employment and economic opportunities, which could be an opportunity for informal waste pickers in terms of construction work. The opening of the RWMCs is also expected to create new jobs, not only at the site of the centre, but also in the municipalities from which waste will be delivered to the centre.

The documents list the guiding principles for the implementation of the RWMC projects, including those relevant to informal waste pickers, which are the following:

- PAPs will be assisted in all phases of the Project in their effort in restoration of livelihood and living standards in real terms to the level prior to Project implementation, as a minimum.
- Special support and concern in the land acquisition process, as well as during implementation of all phases of the Project under this LARF, is provided for affected vulnerable groups, according to their specific vulnerability.
- During the Project implementation, stakeholders will be provided with full information about their grievance rights, possibilities and procedures. All grievances will be taken into account during Project implementation and resettlement activities.

For example, the Rančevo Sombor LARF underscores the lack of information at the time of preparing the document, and indicates the following:

„From the information available at the time of preparation of this LARF it could be concluded that the Rančevo project does not affect property of any persons or legal entities. The informal waste pickers appear occasionally and in small numbers at the Rančevo landfill, Bac and Apatin waste dumps. Their income could be affected with closure of unsanitary landfills to some extent, but more detailed research is needed in order to properly assess this impact. Livelihood restoration measures to be determined once the socio-economic survey is completed. Tentative livelihood restoration is defined under EBRD's PR5⁷. Under point 31, paragraph 3, they would be defined as persons who have no recognizable legal right or claim to the land or property they occupy or use. In accordance with points 34 and 38, they will be offered cash assistance for the restoration of livelihoods. In accordance with point 35, a clear basis for the calculation and distribution of compensation must be documented in line with transparent procedures. Compensation would be provided before the imposition of access restrictions (point 36)."

Consequently, when the document was under preparation, there was no information on informal waste pickers, especially not for the municipality of Odžaci. With the support of the PRO Programme, it was determined that the municipality of Odžaci has four families of informal waste pickers who are directly affected, but it is still necessary to carry out detailed mapping, because there are indications that not all waste pickers have been mapped.

This quote further provides the basis referred to in the Loan Agreement for offering compensation to affected persons out of the project funds (on a different, non-property-related basis) for the restoration of

⁷ [Environmental and Social Policy](#) (Performance Requirement 5, available in English)

livelihoods. This document proposes compensation in the form of cash assistance, however, this aspect is not strictly defined in the Loan Agreement, so it can be considered as one of the options and it can be combined or replaced with other potential measures.

In the process of preparing Local Waste Management Plans, the lead agency of which is the PUC (in the case of the LARF Rančevo), it is very important for cities and municipalities to **determine the availability of funds from the RWMC project**, which should be available under the project documents and could be used to restore the livelihoods of affected informal waste pickers, according to the measures and activities that will be set out in these plans and in the Roma inclusion plans.

The **Entitlements Matrix** in this document lists the types of losses, including the loss of income of persons engaged in waste collection on non-regulated landfills, both formal and informal. The compensation policy set out in the document for these persons reads as follows:

„Livelihood restoration measures to be determined once the socio-economic survey is completed. Measures to be tailored to skills and needs of the affected people. They can include, but are not limited to:

- *Offering in-cash assistance*
- *Offering seasonal jobs*
- *Offering jobs during the construction phase of the Project*
- *Offering jobs on National Employment Service*
- *Offering courses for adult education*
- *Offering courses for acquiring new skills*

In line with the Stakeholder Engagement Plan, waste pickers to be informed about closure of the non-regulated landfills and inability to continue with waste picking as a minimum 30 days in advance.“

As a general principle, this document also regulates the obligation to make all project-related documents public and to conduct public consultations, including establishing ongoing contact with affected communities during project planning and implementation and a grievance mechanism.

In this connection, there is another supporting document, which is a [RWMC Stakeholder Engagement Plan](#). In this plan, informal waste pickers are identified as a stakeholder with a high level of interest, but a medium level of influence and a low level of power. Bearing this in mind, this plan provides for the exchange of information on employment opportunities in all five municipalities and neighbouring places.

Finally, the above mentioned [Environmental and Social Policy](#) of the European Bank for Reconstruction and Development, in the aforementioned performance requirement for projects financed by loans from this bank, PR5: Land acquisition, restrictions on land use and involuntary resettlement, stipulates that this „performance requirement addresses impacts... restrictions on use... and access to assets,... which may cause... economic displacement... leading to loss of income sources or other means of livelihood.“ One of the objectives of this requirement is to improve, or at least restore to pre-project levels, the livelihoods and living standards of affected persons. This requirement applies to „economic displacement that can be full or partial, permanent or temporary, and resulting from [inter alia] restrictions that result in people experiencing loss of access to... livelihoods, irrespective of“ how these restrictions have been created.

In order to meet this requirement, it is first necessary to assess and establish whether there is any so-called “economic displacement” that may be caused by the project, and to estimate the need for resources

under the project. The project should take all possible steps to avoid or minimize such impacts, and vulnerable groups and gender aspects must be taken into account throughout the process. The project also has to provide compensation for the loss of income sources and other means of livelihood. The Social and Environmental Policy sets forth:

„In the case of projects affecting livelihoods or income generation, the client shall plan measures to improve, or at least restore, affected persons' incomes or livelihoods. The plan shall establish the entitlements of affected persons and/or communities, will pay particular attention to gender aspects and the needs of vulnerable groups, and will ensure that these are provided in a transparent, consistent, and equitable manner. The plan shall incorporate arrangements to monitor the effectiveness of livelihood measures during implementation, as well as evaluation once implementation is completed. The mitigation of economic displacement shall be considered complete when the completion audit concludes that affected persons or communities have received all of the assistance for which they are eligible, and have been provided with adequate opportunity to restore their livelihoods.“

In addition to cash compensation for foregone income and the costs of economic displacement, it is an obligation to provide these persons with additional targeted assistance and opportunities to re-establish and even improve their income level and standard of living.

The conclusion of this overview is that informal waste pickers, who will be prevented by the RWMC project from generating income by collecting waste, must be provided with assistance and options that will ensure that their incomes and working and living conditions are not disrupted, but rather improved. This should be achieved through cash compensation and other types of targeted support, while maintaining regular communications and consultations with them.

4.1.1 Framework for Planning

The [Law on the Planning System](#), in its Article 10, sets out four types of public policy documents (1. strategy; 2. programme; 3. policy concept paper, and 4. action plan), while in Article 18 it specifies that an action plan, for the purposes of this law, is a public policy document of the highest level of detail, which is to elaborate a strategy or programme with a view to managing the implementation time frame of the public policy measures contributing to the achievement of the specific objectives of a particular strategy and/or programme. An action plan constitutes an integral part of a strategy or programme and is usually adopted for the period of implementation of the strategy or programme or, by way of exception, for a shorter period (not shorter than a year), provided that the action plan for the following period is also adopted in a timely manner, up until the end of the validity period of the strategy or programme. The action plan may be periodically revised.

The action plan contains overall and specific objectives of the strategy or programme, measures and activities (specifying projects if they are implemented through projects) to achieve the objectives, implementing bodies and other institutions and partners involved in implementation, time limits for the

completion of measures and activities, required funds for their implementation and sources of funding, performance indicators at the level of measures (and activities, as needed), information on regulations that are to be amended or adopted in order to implement public policy measures and other elements prescribed by the by-law. [The content and format of the action plan is to be specified by the Government.](#)

In the process of deciding on the approach to developing a Local Action Plan for Roma, which predominantly relies on inter-institutional and inter-sectoral cooperation, local decision-makers should make sure to monitor the synergy among local sectoral strategic acts (applicable ones, those under development and future ones), in order to keep track of the outcomes and results of the invested funds, and the concerted impact on changes among Roma.

The Government of the Republic of Serbia has adopted [by-laws](#) that further define the methodological application of the Law on the Planning System of the Republic of Serbia:

- [The Regulation on the Methodology for Public Policy Management, Impact Analysis of Public Policies and Regulations, and the Content of Individual Public Policy Documents](#)
- [The Regulation on the Methodology for the Preparation of Medium-Term Plans](#)





4.2 Strategic Framework

[The –Strategy for Social Inclusion of Roma in the Republic of Serbia 2022-2030](#), is an inter-institutional and cross-sectoral document that is key to strategic and sustainable social inclusion of the Roma in Serbia.

Table 2: An overview of the areas and cross-sectoral documents

Sector	National level	Local level
1. Housing	National Social Housing Strategy	Social housing programme
2. Employment	Employment Strategy of the Republic of Serbia 2021 – 2026	Employment LAP
3. Education	Strategy for the Development of Education in the Republic of Serbia until 2030	/
4. Health care	Public Health Strategy of the Republic of Serbia 2018–2026	Public Health Plan
5. Social protection	Strategy for Deinstitutionalisation and Development of Community-based Social Services 2022-2026	Programme for improving social protection services
	Strategy for Active and Healthy Ageing in the Republic of Serbia 2024 – 2030	Programme for improving social protection services
6. Environmental protection	Environmental Protection Strategy – Green Agenda of the Republic of Serbia 2024 - 2033	Environmental Protection LAP
	Waste Management Programme of the Republic of Serbia 2022-2031	Waste Management LAP
	Regional Waste Management Plan	
7. Discrimination	Strategy for Prevention and Protection from Discrimination 2022-2030	/
8. Gender equality	National Strategy for Gender Equality 2021 – 2030	Gender Equality LAP

The systemic support measures for informal waste pickers proposed in the Local Action Plan for Social Inclusion of Roma should be aligned with the measures proposed in other sectoral local documents. The ex-post analysis of any sectoral strategic document should offer a synergetic overview of the accomplished results.

4.2.1 Regional Waste Management Plans

Regional waste management plans have been adopted for five out of six Regional Waste Management Centres.

Table 3: Overview of the Regional Waste Management Centres

RWMC	RWMP validity period	Number of LSGs	LSGs covered by RWMCs and RWMPs
Banjica (Nova Varoš)	2021-2030 ⁸	4	Sjenica, Priboj, Prijepolje and Nova Varoš
Kalenić (Ub)	2024-2033	15	Loznica, Valjevo, CM Obrenovac, CM Lazarevac, CM Barajevo, Ub, Lajkovac, Mionica, Osečina, Koceljeva, Vladimirci, Ljig, Krupanj, Mali Zvornik, Ljubovija
Rančevo (Sombor)	2023	5	Sombor, Apatin, Odžaci, Kula, Bač
Srem Mačva (Sremska Mitrovica)	2024	5	Sremska Mitrovica, Šid, Bogatić, Šabac, Ruma
Duboko (Užice)	2024-2034	9	Užice, Požega, Bajina Bašta, Arilje, Čajetina, Kosjerić, Čačak, Lučani, Ivanjica
Pirot (Pirot)	2024-2033	4	Pirot, Babušnica, Dimitrovgrad, Bela Palanka

The Kalenić RWMP broadly recognizes the category of informal waste pickers, and in the territory of 10 LSGs specifically, while the Rančevo RWMP and the Srem Mačva RWMP, in their chapters on public participation, recognize informal waste pickers in the entire territory of the West Bačka and Srem-Mačva districts, putting an emphasis on the role of the private sector in creating new jobs and developing new activities. The Rančevo RWMP stresses in particular that this is necessary for those waste pickers who live below the poverty line, without social protection and health care, and who work in unhygienic conditions, without adequate equipment and protection. Their inclusion into the waste management system should provide them with better working conditions, social protection, health care, and adequate equipment. This plan also recognizes that the majority of informal waste pickers belong to the Roma national minority, for which reason it is necessary to include Roma organizations to act as mediators in designing programmes and measures. The Duboko and Pirot RWMPs have not incorporated the category of informal waste pickers, although certain LSGs belonging to these RWMPs have demonstrated interest in participating in the PRO programme for social inclusion of informal waste pickers.

The [Waste Management Programme of the Republic of Serbia for 2022-2031](#) has recognized the existence of informal waste pickers in the following manner: „*The informal sector has been collecting quality packaging waste for decades now. In the legal sense, the activities of the informal sector are not regulated by the legislation of the Republic of Serbia. According to some estimates, the sector of informal waste collection in the Republic of Serbia consists of 30,000 to 50,000 individual waste pickers, who perform their activities according to the principle of informal economy.*“

The programme also recognizes the important role of informal waste pickers in the overall waste management system, but it does not feature a detailed analysis of the situation of this segment and, consequently, does not offer more detailed solutions regarding the method to incorporate waste pickers into that system, with a view to improving their position commensurate with the improvement of the system as such. The only thing stipulated by the programme is that „*The implementation of the Programme will also create opportunities for the employment of informal waste pickers, which will affect their standard of living*“, but without any further elaboration. Thus, the Waste Management Programme of the Republic of Serbia sets forth the obligation to create employment opportunities and raise the living standards of informal waste pickers through the implementation of the programme as such, but leaves room for specifying this obligation at a lower level, primarily by assessing the opening state, and then, depending on the local context, by adopting and implementing specific measures that would include informal waste pickers into the waste management system in a manner that would improve their standard of living and ensure income for a dignified life.



5. SWOT ANALYSIS

Below is an overview of the analysis of strengths, weaknesses, opportunities, and threats (SWOT analysis) in the areas of education, employment, housing, healthcare, and social protection. This analysis is intended to serve as a guideline for preparing local SWOT analyses for the Local Action Plan (LAP) for the social inclusion of Roma men and women. The working groups formed in local self-government units (LSGs) should adapt the proposals to local needs and context by revising these suggestions or supplementing them with new ones.

EDUCATION

STRENGTHS

- Transportation for children, pupils, students from socially disadvantaged families and FPAE learners provided free of charge
- Roma pedagogical assistants secured in primary schools, with a focus on children transferring from 4th to 5th form (dropout prevention)
- Scholarships secured for primary and secondary school pupils from materially disadvantaged families, as support to dropout prevention
- Romani language instruction introduced in primary schools and a Romani language teacher secured
- The existence of an afterschool programme in primary schools, where homework is done and children from socially disadvantaged families are provided with a hot meal and snacks

WEAKNESSES

Economic and social causes:

- Lack of funds for material support to Roma families in education (books, snacks, worksheets, clothes, footwear)
- An insufficient number of preschool children enrolled in kindergartens, although Roma constitute a priority category, most often due to the unemployment status of the parents

Low level of education and information:

- Inadequate knowledge of the Serbian language among a number of Roma preschool children
- Low level of information about the procedures for enrolling in preschools and schools, as well as the obligations and rights of parents and children
- Lack of awareness among Roma about the options for completing primary/secondary education, additional training and/or retraining
- Staff in LSGs, the education and employment systems inadequately educated about the topic of preventing discrimination

**Infrastructure and logistical problems:**

- Distance from educational institutions and lack of public transport from less accessible places where Roma live

Low coverage by education and high dropout rates:

- Roma children dropouts from the education system
- Existence of systemic and other problems that discourage Roma from enrolling in education and continuing their schooling.

Lack of adequate adult education programmes:

- Limited programmes that are focused on adult Roma education and that are adequately designed to meet their needs
- Lack of mentoring programmes or other forms of support give rise to difficulties in reintegration into the education system
- Fewer options for additional training or retraining.
- Lack of motivation, language problems, social and economic pressures

Shortcomings in the education system:

- Incomplete records on Roma children and parents' needs in local self-governments and educational institutions
- Absence of pedagogical assistants, mentoring programmes, or other forms of support lead to difficulties in learning and integration into the education system.

OPPORTUNITIES

- Affirmative action measures for enrolling Roma students in secondary schools and universities
- Additional training and retraining programmes
- Possibility of introducing new educational profiles in secondary schools and dual education
- Adult education (with the possibility to apply new technologies and distance learning options at one's own pace)

THREATS

Stereotypes and discrimination:

- The presence of prejudice and discrimination in schools leads to Roma children not feeling a sense of belonging to the education system, which affects their motivation and success.

Unhygienic conditions and health issues:

- Poor living and health conditions affect the ability of children to attend school regularly or even complete their education due to frequent illnesses or insufficient health care.

Highly set criteria for inclusion of Roma in additional training and retraining programmes:

- Programmes implemented through the NES usually require completed secondary education, which Roma generally lack.

Mismatch between educational profiles and labour market needs:

- Problems with adjusting educational profiles to the real needs of the labour market, which can reduce the employability of Roma after they complete their education.

EMPLOYMENT

STRENGTHS

- Developed cooperation with local employers and businesses that are willing to employ Roma or provide internships/training
- Developed cooperation with local employers and businesses that are willing to employ Roma in jobs with flexible work conditions
- Support for self-employment and entrepreneurship, with mentoring programmes lasting 6 and 12 months
- The existence of trained and experienced educators who have specific experience in working with the Roma population, which improves the quality of training and preparation of Roma for their respective workplaces.
- The LSG has introduced a social innovation programme that combines education, training and social support for Roma families, and other economically disadvantaged families
- The LSG has introduced a professional development support programme that allows Roma to continue their education or professional development, such as scholarships for schools or courses, can enable them to improve their skills and improve employment opportunities.
- The LSG has introduced programmes that focus on empowering Roma women and young Roma in the field of employment (training, support in entrepreneurship) and can help them become economically independent and part of the workforce.
- Good professional competencies of NES employees for working with the unemployed
- Good capacity of AEPs for all participants and programmes for additional training, retraining and courses that meet the needs of the labour market
- New trends in employment - green agenda and digital transformation.

WEAKNESSES

- Incomplete and obsolete data on unemployment among Roma and other data related to their employment situation
- A large number of Roma without primary education
- Low interest of Roma in existing employment programmes
- Insufficient budget funds (travel expenses, monthly commuting tickets, teaching materials) for AEPS students
- Weak inter-institutional cooperation, coordination and support for Roma who want to obtain additional education and get a job.
- Low level of information among Roma about existing active labour market policies
- Inadequately planned active labour market policies to meet the needs of Roma, while taking into account their circumstances
- Poor organization of public transport in the city/municipality for commuting to/from work
- Lack of mentoring support programmes during retraining and additional training programmes
- Lack of knowledge and information among Roma about their rights and obligations arising from the employment
- A large number of Roma employed in the informal economy, including primarily waste pickers, as well as seasonal workers in agriculture, construction workers, musicians, cleaners, etc.
- Programmes of support for employment are outdated and are not aligned with the Roma way of life
- Lack of a reliable database on the number of informal waste pickers collecting recyclables and their situation and needs
- Lack of active labour market policies targeting the needs of informal waste pickers collecting recyclables.

OPPORTUNITIES

- Project initiatives and programmes of the EU and other donors, aimed at employing Roma men and women
- Job fairs
- Social entrepreneurship programme
- Women entrepreneurship programmes
- Arrival of investors and creation of new jobs in the municipality
- Good practices of local associations that use various opportunities to finance their activities as an incentive to Roma associations
- New jobs that will be created through the reform of the waste management system
- Active labour market policies in employment LAPs
- A stable source of funding - from the republican and municipal budgets

! THREATS

- Exacerbation of the economic crisis and poverty in the country and the region, which may lead to even greater unemployment and impoverishment of the Roma population.
- Poor synchronization with higher-level institutions and government actors at the national level
- Cleaning up waste dumps and establishing a Regional Centre for Solid Waste Management, threatens the livelihood of informal waste pickers, mostly members of the Roma population, who depend on this work.
- Progressive reduction of opportunities for working in the grey economy, which may result in an increased number of unemployed persons and a very sharp rise in poverty among vulnerable categories of citizens
- Low interest of the Roma population in active job seeking outside the informal economy as a result of various reasons and life circumstances
- Inefficient management of local resources
- Low level of inter-institutional cooperation, which is reflected in poor communication and coordination between various local institutions and authorities.
- Lack of cooperation with the non-governmental sector and associations dealing with social inclusion and social issues.
- Political instability
- Low capacities in LSGs (lack of resources at multiple levels)
- Low capacity of the NES branches (lack of resources at several levels)
- Unpreparedness of an LSG for innovation and modernization
- Low economic development of the municipality and the downward trend of formal employment opportunities

HOUSING

↑ STRENGTHS

- Detailed regulation plans for Roma settlements adopted (settlements to be listed)
- A city/municipal fund established to support the reconstruction and adaptation of existing housing units, with a focus on Roma settlements
- A city/municipal team set up, and an officer designated to receive complaints for unresolved property issues as a prerequisite for the legalization of facilities, with a focus on Roma settlements
- Working Group formed for the development of a Rulebook for support in housing loans and/or subsidies for young families, with a focus on young Roma families



WEAKNESSES

- Lack of a systematic approach to collecting data on Roma households and their needs in the field of housing
- Poor condition of existing communal infrastructure and lack of its regulation in Roma settlements, including water supply, sewage, electricity, heating
- Energy poverty as a result of low incomes, poor infrastructure and inadequate energy efficiency
 - Lack of social housing
 - Unresolved property relations that hinder the legalization of dwellings
 - Poor housing conditions (lack of bathrooms, poor roof construction, flooring, poor joinery, lack of part of basic furniture and appliances)
 - Large households (3-4 families in the same space)
 - Existence of waste dumps close to settlements - a housing challenge, related to economic activity
- Lack of social and economic infrastructure in Roma settlements or in their vicinity
 - Low level of information among Roma on available housing support programmes (small number of Roma families who have acquired the status of energy vulnerable customers)

OPPORTUNITIES

- Working Group for the Development of Social Housing and/or Subsidized Housing established
- A Programme for the purchase of rural houses established and opened for participation to members of the Roma Community
- Support of line ministries for solving the problem of poor housing conditions in which Roma live
- Donor funds for improving housing conditions for the Roma population
- Application of the Law on Social Housing at the local level
- Investment in green technologies and energy efficiency
- Social housing programme for young families and single-parent families
- A strong LEDO with infrastructure as priority projects
- Exemption from payment of fees for legalization of dwellings available to all persons belonging to marginalized groups (financial social assistance beneficiaries, people with developmental disabilities, single parents)



! THREATS

- Unstable political situation
- Frequent amendments to laws governing housing, which define increasingly complicated procedures for legalization of dwellings
- Lack of sufficient donor funds for infrastructure projects in Roma settlements
- Lack of a national fund for addressing the housing issue of Roma and other socio-economically disadvantaged categories
- Lack of awareness among members of the Roma community about the procedure, as well as about the advantages and incentives for legalization of facilities
- Informal waste pickers are at risk of losing part of their income due to the new waste management system, and consequently of sinking into even greater poverty while risking deterioration or loss of their housing
- Many Roma are in a situation where their wages are garnished for defaulting on loans, which further undermines their position and exacerbates their poverty. The absence of rescheduling programmes for debt repayment increases the risk of sinking further into indebtedness and inability to escape the cycle of poverty
- Highly set criteria for legalizing dwellings (resolved property and legal issues, quality of construction of dwellings, etc.)

HEALTH CARE

↑ STRENGTHS

- Availability of the health care system to the Roma population in their settlements
- Coverage of Roma settlements by all the services of the Community Health Centre
- Preventive medical check-ups campaigns on the ground
- Existence of civil society organizations (CSOs) engaged in activities of improving the health of Roma, which, in cooperation with the Community Health Centre, organize educational workshops in primary and secondary schools on the topics of preventive health of young people (prevention of teenage pregnancies, transmission of STDs and HIV, and other health risks), as well as workshops for the older population on the topics of preventive health (prevention of chronic diseases, the importance of regular medical check-ups, healthy lifestyles, and prevention of age-related diseases)
- High percentage of Roma who have health cards and personal documents
- Adopted Public Health Plan that incorporates support measures for Roma
- A high birth rate and a young Roma population.



WEAKNESSES

- Lack of data on Roma health due to the absence of planned surveys and systematized data on Roma health
- No engaged health mediators
- Weak response of the Roma population to preventive medical examinations and screening programmes
- Low awareness of the importance of preventive medical examinations and treatment of non-communicable chronic diseases
- Compromised reproductive health of Roma women (teenage pregnancies, abortions, contraception)
- High percentage of addicts to tobacco, alcohol, other narcotic drugs and psychotropic substances, including among the population of minors
- High percentage of persons suffering from COPD, asthma, depression
- Poor sanitary and hygienic living conditions (water supply, electricity, sewage) in Roma settlements
- Inadequate educational structure of the Roma population
- Low standard of living and compromised general health due to inadequate nutrition
- Lack of mental health counsellors
- Lack of developmental counselling services
- Part of the Roma population does not have health insurance and access to the health system
- Compromised general health due to performing work that is harmful to health (collecting recyclables at waste dumps, burning cables to extract copper, etc.)
- Unavailability of specialist medical examinations in the public health sector in small communities
- Inability to cover travel costs, co-payments, hospital accommodation fees and other costs when treatment is provided in another LSC

OPPORTUNITIES

- Donor programmes aimed at improving the status of the Roma population
- Cooperation with the Ministry of Health
- Establishment cooperation with Public Health Institutes, associations that support local initiatives to improve the quality of life for Roma (Association of Health Mediators, SCTM)
- Implementation of the local Public Health Plan and national programmes for the prevention of communicable and non-communicable diseases
- Ongoing support for the implementation of media campaigns to promote health and healthy lifestyles conducted by the Community Health Centre
- Relatively well-developed network of health care institutions/outpatient clinics



- Existence of the Health Council and the Environmental Protection Council
- Existence of the institution of the protector of patients' rights
- Existence of funding from the municipal budget earmarked for improving the health and social status of vulnerable population categories
- Implementation of media campaigns to promote health and healthy lifestyles conducted by the Community Health Centre
- Good cooperation between local institutions in the field of health care

THREATS

- Risk of outbreaks of epidemics in Roma communities, which could then spread to larger population segments
- Deterioration of chronic diseases due to inadequate treatment
- Risk of unwanted teenage pregnancies and abortions

SOCIAL PROTECTION

STRENGTHS

- Recognized needs of the Roma population in the field of social protection
- There is infrastructure that provides support (Social Welfare Centre, Red Cross, NGOs)
- Willingness of employees in the municipal administration and the civil sector to actively participate in programmes and projects aimed at improving the status of the Roma population
- Established and functional Mobile Team for Roma Inclusion.

WEAKNESSES

- Lack of a systematic approach to collecting data on Roma households and their needs in the field of social protection
- Provision of information to Roma about their rights in the field of social protection is not adjusted so as to make their rights and services more accessible
- Non-existence of a position in the job classification act - Roma Coordinator



- Roma associations do not have the capacity to implement projects, or their own space for the work of associations
- Part of the professional staff is unmotivated, "tired" and unprepared for changes in working with beneficiaries
- Lack of interest in further training on the part of the professional staff
- Existence of prejudices about vulnerable groups
- Dissatisfaction at communication with social protection service providers on the part of a number of social welfare beneficiaries
- Inadequate awareness of the general public about the status of the Roma population
- Insufficient representation of Roma in local institutions, including the Social Welfare Centre
- Inadequate involvement of Roma in decision-making processes
- Unsustainability of implemented projects.

OPPORTUNITIES

- Financial and technical support from domestic and foreign donors in the field of social inclusion of Roma (line ministries, international organizations, IPA funds)
- Protocols for combating and preventing violence and abuse of women and children
- Development of inter-municipal social protection services
- Use of IT solutions for more efficient monitoring and management of social protection services
- Financing of social protection entitlements and services provided in accordance with the current Decision on Social Protection
- Transparency in co-financing of programmes and projects of local civil society organizations in the field of social protection
- Availability of services in all parts of the municipality/city

THREATS

- Fluctuations in transfers of funds to local government budgets from the national to the local level of government
- The risk of discontinuation of social assistance to poor Roma if they participate in various programmes for strengthening and improving their situation, and receive a certain type of benefits or assistance through those programmes

6. RECOMMENDATIONS

Below are recommendations for including informal waste pickers when initiating the development of the Local Action Plan for the social inclusion of Roma men and women.

1. The plan needs to follow the planning instructions of the [Public Policy Secretariat of the Republic of Serbia](#).
2. Before embarking upon the development of the plan, it is necessary to obtain data on the number and situation of informal waste pickers. The PRO programme has identified a certain number of informal waste pickers and mapped their situation and basic needs through a family assistant. It is necessary to carry out additional socio-economic mapping for the purpose of determining whether there are informal waste pickers in the territory of an LSG, and where mapping has already been carried out, to check whether the number of informal waste pickers has gone up, and if it has, it is necessary to carry out additional mapping of the situation and needs of those waste pickers and their families who have not been mapped so far. The mapping of informal waste pickers should ideally be carried out before the development of the action plan, in order for the planning to be performed based on concrete data. Mapping can also be one of the measures in the Local Plan for Social Inclusion of Roma and can be done as part of the Local Waste Management Plan.

In order to facilitate the mapping, a set of documents has been drafted within the PRO programme, which local self-governments can use for their own needs, possibly after adapting them to the local context.

Proposed measure:

Detailed mapping of informal waste pickers and their families, their socio-economic status and needs.

3. The plan should recognize the existence of informal waste pickers, define them, and include basic information about them and their status (as in the previous item). The definition can be based on the existing definition:

Proposed definition:

A waste picker is a natural person or a legal entity that collects waste. An informal waste picker is a natural person who, on his/her own or with the help of his/her family members, collects waste at landfills and sorts it, and then sells it on to private waste buyers to secure the only income or additional income keeping the waste picker's family on the verge of poverty.



4. The working group tasked with drafting the Local Action Plan should include a representative who will advocate the interests of informal waste pickers and who will maintain regular contact and consultations with them, and whose voice in the working group will be heard and considered in the best possible way. One possible suggestion is to incorporate a family assistant (a person engaged under the PRO programme as a link between informal waste pickers and relevant institutions at the local level) into the working group.

If the LSG was not a beneficiary of the PRO programme, a member of the working group can be someone who is employed with the LSG and who deals with Roma issues or a member of the Roma community, preferably from among the ranks of informal waste pickers.

In addition to other members engaged in the areas of housing, health, employment, education, etc., the working group should comprise (just like the mobile teams) a representative of the PUC, the Chamber of Commerce and a representative from the education system that provides functional primary adult education ([FPAE](#)), as well as lifelong learning aligned with the needs of the labour market and the challenges of technological development.

Proposed measure:

Regular deliberations of the working group / mobile team through field visits and regular meetings, to ensure coordinated implementation of measures and monitoring of progress in improving the situation of informal waste pickers.

5. The plan needs to include a list of documents that constitute the basis for incorporating measures for informal waste pickers. This list of documents can be taken from this document, while the specification of the content of the documents from the list does not have to be provided in the text of the plan itself but can be attached as an appendix.
6. It is desirable for the plan to feature in its introductory part a basis for including waste pickers into the plan as a separate priority group.

Proposal:

The LSG has not yet/has implemented projects specifically aimed at the economic empowerment and formal employment of Roma who work as waste pickers. Since the LSG is covered by the programme for improving the waste management system at the regional level, it has to ensure within the framework of its obligations that the implementation of the programme will not reduce the livelihoods of the families of waste pickers, while it should also increase them, as much as possible. This is the reason why this group of Roma has been specifically included in this plan.

7. The situation analysis should be reduced to the essential information related to the objectives of the plan, which should also include a brief overview of the situation of informal waste pickers.



8. It is necessary to create a connection between the LSG Development Plan and lower-level documents.
9. When preparing the SWOT analysis, attention needs to be paid to the situation of informal waste pickers as well, relying on information from the previously conducted mapping of the situation on the ground or, if mapping has not been carried out, indicating this and conducting it under the plan.
10. Due to the complexity of the problem of poverty of informal waste pickers, it is necessary for the measures aimed at them to be harmonized and linked into a series of relevant plans, which include, in addition to the Local Waste Management Plan, the Local Plan for Social Inclusion of Roma, the Local Employment Plan, and other plans in the areas of health, education, social protection, and the like, being already recognizable at the level of the SWOT analysis.
11. Follow the area-specific proposals provided in Section 4 (SWOT analysis), which should serve as a guideline for preparing local SWOT analyses and the Local Action Plan (LAP) for the social inclusion of Roma men and women. The working group should thoroughly review all statements, delete those that are not relevant in the local context, and add any elements that are not covered by these proposals.
12. The plan should include a specific objective, measures and activities, including financial implications, related to support for informal waste pickers to transform their economic activity within the waste management system, in order to, on the one hand, integrate into the new system, and, on the other hand, have the possibility to improve their livelihoods and achieve higher living standards. This may include a number of specific measures, primarily associated with formal employment in the waste management system.
 - Employment with a cooperative, which has already been set up or could be set up as one of the planned measures, at the regional or local government level; employment could be decentralized, i.e., employed waste pickers could perform their work in the populated areas where they live or relatively close to them;
 - Employment in the construction industry and within the framework of operation of a waste transfer station, waste selection yard, green islands, or other ancillary infrastructure, if it has been built or there is a plan to build it;
 - Employment with a RWMC (a sanitary landfill, a plant for mechanical-biological waste treatment, anaerobic digestion, and recycling).
13. Additional measures of support to informal waste pickers can and should include:
 - Granting the status of social enterprise to a company that will employ informal waste pickers;
 - Supporting the company that employs waste pickers by providing work space, legal and accounting services, assistance for sales and cooperation with partners (from the public and private sectors), priority in the selection for public works and tenders, advertising of the company by the LSG (for example in the official gazette, on bulletin boards, etc.) and other types of support depending on the possibilities, needs and circumstances, and in coordination with the waste pickers.

- Adopting a municipal decision not to discontinue cash benefits for informal waste pickers and their family members due to potential earnings, to ensure that family incomes are not decreasing, but rather increasing;
 - Providing administrative and legal assistance for the exercise of social welfare entitlements of waste pickers and their families;
 - Signing Cooperation Agreements with schools implementing FPAE and ensuring conditions for informal waste pickers to attend classes (distance learning, providing funding for travel expenses "to and from school", etc.).
 - Training informal waste pickers so that they can be employed in various jobs, including better-paid jobs in the waste management system (not only waste treatment jobs, but other jobs as well, such as waste transport). Training should encompass the required formal (primary, secondary) education and practical training for concrete jobs. The required formal education can be obtained in a school for adult learners, and can also be organized as distance learning, in order to facilitate access to education for this group. During the period of education (before their employment) they should be offered compensation for the foregone income;
 - Cash compensation for foregone income is already envisaged by the regional project and should be allocated and distributed to informal waste pickers;
 - Other indirectly relevant measures to support informal waste pickers, such as providing transport, or hot meals, or other solidarity-based material assistance (such as fuel for heating, furniture, housing upgrades, energy efficiency adaptations, etc.);
 - These measures should also be linked to other measures defined in other plans, in order to provide comprehensive and targeted assistance to waste pickers and their families, such as measures for waste pickers and their family members in the fields of health care, education for children and adults, housing, etc.
 - Development of housing programmes for Roma through public-private partnership initiatives;
 - Scholarship programmes and additional assistance for Roma students in education (Establishment of mentoring programmes to support children and youth from the Roma population in their studies (older students helping younger ones))
14. In accordance with all recommendations set out in relevant high-level documents, the local waste management plan should also provide for a complaint and grievance mechanism.

