Status manjinskih prava na Kosovu: Izazovi i prepreke
Statusi i të drejtave të pakicave në Kosovë: Sfidat dhe pengesat
Minority rights status in Kosovo: Challenges and obstacles

Mitrovica 2019.
Introduction

The past several years in Kosovo have wrought a number of developments that have triggered fundamental shifts in its internal and external political dynamics. These changes, that have broad implications for the future of the region, have been trigged by events such as the stalling of the dialogue process, politically-motivated violence in the north of Kosovo, and a continued lack of transparency expressed by the political representatives of Kosovo’s various communities. The ossification of the dialogue process, already opaque and intangible to many of Kosovo’s citizens, has generated a situation that is rife with speculation and widespread concern over the future of many of Kosovo’s non-majority communities. Increased talk of partition as a potential sustainable and long-term solution to the question of Kosovo’s status has created significant worry of the ability of political actors and institutions to provide sufficient mechanisms to protect rights constitutionally afforded to minorities. Furthermore, the overall dialogue process has, thus far, largely failed to assuage concerns over the evident lack of political will on the part of Kosovo’s institutional actors to effectively and evenly implement legislation that is designed to protect minority rights. Although the legal framework, as it exists on paper, can be generally described as progressive in that it grants minorities not only a comprehensive set of rights but also a degree of autonomy in governing community affairs, its actual application on a day-to-day basis is patchy at best. The confluence of all of these various factors has led to an overall atmosphere of uncertainty, and a notable lack of institutional trust and confidence that these institutions are willing or capable of extending effective protections to non-majority communities.

In such circumstances an in-depth analysis of the issues mentioned above is urgently necessary in order shed light on various issues affecting the Kosovo Serb community. Having this in mind, the overreaching goal of report was to take into consideration the viewpoints of those directly engaged in these questions in order to provide substantive information on these topics. This was achieved by engaging various civil-society organizations in the drafting process in order to utilize their various and specific areas of expertise and geographical coverage. In this spirit, members of non-governmental organizations have put forward a joint effort on the goal writing this report as a means of establishing a sustainable and objective monitoring mechanism in regards to minority rights in Kosovo. The overarching logic behind this is that such a mechanism is necessary due to rapid and indeed unpredictable socio-political changes and their potential effect on the future of minority rights as a legal and constitutional concept in Kosovo. With this in mind, this report was drafted with a critical focus on issues that are of particular importance to the Serb and other non-majority communities in Kosovo and their future economic, political and cultural well-being and preservation.
Consultative council for communities

I. Context and description of the problem

The Consultative Council for Communities is part of the Office of the President of Kosovo and consists of twenty-seven members. The Council shall make decisions independently in relation to the Office of the President and it does not reflect his positions. The role of this body is to promote the rights and interests of communities and to make recommendations to the executive authorities regarding violations of the law. The Council was formally established by the Decree of President of Kosovo on September 15, 2008 and held its inaugural session at the end of the same year. It is made up of representatives of Serbian, Bosniak, Turkish, Montenegrin, Croatian, Egyptian, Ashkali, Roma and Gorani communities.

The mandate of the Consultative Council for Communities encompasses the provision of a mechanism for regular exchange of views between the communities and the Government of Kosovo. The responsibility of this body is to help organize and articulate attitudes of non-majority communities and their members when it comes to legislation, public policy and programs of special importance to them. The Council consists mainly of members of the non-governmental sector elected by their non-majority community (the law stipulates that, in a certain number, members may also be elected), and there as well are three nominated representatives from the Government of Kosovo and one appointed representative from the Office of the President of Kosovo.

Like many other bodies in Kosovo, the Consultative Council for Communities is in its legislative work well thought out and formulated, on the basis of examples from parallel legislations, but on the other hand, in practice it shows a lot of deficiencies and problems. The Council does not fully fulfill its mandate, in the first place it misses the opportunity to be a key body for protecting the rights, organization and articulation of attitudes of non-majority communities, and reasons for this are several, from technical, personal, organizational, financial ones, etc.

As a fundamental deficiency of the Council, it can be stated that members of the Council do not utilize the possibility to participate in initiatives at the earliest stages in legislative procedures or policies prepared by the Government or the Assembly, also it does not submit recommendations to the proposals of laws and
policies for better representation of non-majority communities. During 2018, despite the fact that the Council received all required law proposals for inspection, the Council did not send any comments or recommendations for additions or amendments to the proposed laws and policies¹.

As a very positive thing, and at the same time the greatest success of the Council in 2018, it should be noted that the Council initiated the start of drafting of the new Law on Communities ². At the initiative of the President's Office, the President took over the drafting of a new law, and in 2019 the Council plans to take a very active role in the creation of this very important document for non-majority communities. Unfortunately, this was the only initiative in 2018, so it can be concluded that the Council did not make a sufficient number of initiatives during 2018. It should also be noted that there is very poor communication between the members of the Council and representatives of the communities they represent, and level of information about the work of the Council is still very low. The lack of field-related activities for communities they represent, as well as lack of regular consultative meetings, is the main reason for poor information and poor communication with the communities that the members of the Council represent. Budget deficiencies are the main reason for the lack of such activities.

The Consultative Council for Communities has fulfilled its role as a forum for coordination and consultation among communities, but due to lack of initiatives and specific activities (due to the small budget), the Council has a problem to present its work in the right way, and also to strengthen its position among non-majority communities.

As already noted above, the Council faces many technical and organizational problems. The first problem should be the lack of interest of certain communities and institutions for the work of the Council. When choosing members of the Council in 2018 from among the Serbian community, 16 organizations were accredited, of which only one from the four majority Serb municipalities in northern Kosovo³. This is an increase in the number of organizations compared to the previous elections, but a large number of significant organizations still do not participate. Cooperation with institutions is not at a sufficiently high level. The new Council was established in October 2018, and to date (March 2019), the Government did not appoint its representatives to the Council.

¹http://www.ccc-rks.net/index.php/sr/aktivnosti/godisnji-izvestaj-rada-meny
Another problem is the expertise and dedication of members of the Council, where each community should select members as professional as possible for the Council, but there are certain problems, primarily regarding the duration of mandate. The term of office of the members of the Council is two years, with a possible re-election to a maximum two more years. Such a short mandate carries certain practical problems, primarily due to fact that smaller communities lack professional staff that can meet the requirements and be productive members. On the other hand, the criteria for choosing members for the Council are rather broad, so that members of the council are practically persons who have the good will to help their community, but they lack the expertise to adequately and effectively articulate this good will.

The next problem is the budget the Council has at its disposal. During 2018, the Council had an annual budget of 47,000 euro. For one body which is a constitutional category, and which should be one of the main mechanisms for protecting non-majority communities and improving their position, these funds are very small. Members of the Council receive a certain additional fee for their work in the Council (daily allowances), but this fee is small and does not provide for members of the council to fully devote themselves to work in the Council. Because of the small budget, members of the Council are not able to have more field work, and also to have better contacts with representatives of their communities. The budget for 2019 has been increased, but it is still low for the body of this nature.

As a positive thing, it must be noted that, when choosing a new Council in 2018, almost equal numbers of women and men were elected to the Council (out of 23 elected members, 11 were women), which was not the case in the previous terms. Currently there is a process of preparing a new law on communities, which will regulate the work of the Consultative Council in one of its parts, so it is necessary to use this moment to improve the efficiency of the Council.

---

4http://www.ccc-rks.net/
5Ova suma služi za pokrivanje troškova rada sekretarijata Veća, kao i za pokrivanje troškova i aktivnosti Veća.
6http://www.ccc-rks.net/
7http://www.ccc-rks.net/index.php/sr/onama/clanovi-svz-a-2016-2018
Recommendations

- As the first thing to insist on is the extension of the mandate of the members of the Council and the increase in the number of terms, which will increase the efficiency and productivity of the Council, while creating the possibility that the members of the Council are the most dedicated members of their community. Also, the training provided for the new members of the council should be carried out prior to their involvement in the work of the council, so after formal appointment they can immediately become functional members.

- Activities must be undertaken in order to increase the number of accredited organizations and associations, which would ensure that the Council has the best composition quality. This should be achieved through promotion and information activities during the process of accreditation of associations and organizations.

- With the extension of the term of office, the criteria for selecting new members must be strengthened, especially in the field of expertise, because the expressed good will for dealing with certain issues related to their community is not sufficient, but it is necessary to prove sufficient expertise in order to deal with these issues. This will be done in the Council by an expert staff who will have the opportunity to give their contribution for a longer period through the work of Council.

- Funds should be provided for members of the Council to have regular consultations with representatives of their communities, which would increase the visibility and better information of members of the Council regarding problems that their community faces.

- The funds envisaged for the work of the Council should be significantly increased, either through budget of the Council or through donations. The members of the Council should be given the opportunity to be more dedicated to the work of the Council and to contacts with the community they represent through an increase in remuneration. This will increase productivity and efficiency of the Council and would also increase the number of people interested in participating in the work of this body.

- It is necessary to increase the number of specific activities that the Council implements in solving certain problems, in order to promote the work of this body and in some way to improve the position of all communities.
I. Context and description of the problem

The Council of Europe’s Framework Convention on the Protection of Ethnic Minorities has laid down the legal basis for respecting minority rights, which was supported, among others, by Kosovo. Kosovo’s legal framework relies heavily on this international framework, and the following legal remedies are defined on the basis of common international law practices for protection of minority rights:

- Law No. 03/L-047 on the Protection and Promotion of the Rights of Communities and Their Members in Kosovo adopted on March 13th, 2008.
- Law no. 04/L-032 on Pre-university Education, adopted on August 31st, 2011.
- Law no. 03/L-068 on Education in the Municipalities of Kosovo, adopted on June 15th, 2008.
- Law no. 02/L-88 on Cultural Heritage, adopted on October 9th, 2006.
- Strategy for Inclusion of Roma and Ashkali Communities in Kosovo Society 2017-2021

All of the aforementioned legal mechanisms in Kosovo have been adopted with the aim of respecting and protecting the rights of non-majority communities, and their development in social, political, economic and cultural life. However, the application of the aforementioned Kosovo laws is often in conflict with practice in the field. Although the institutional and legal framework is adequately defined and adapted to the needs of non-majority communities in Kosovo, the implementation of the law is poor and often depends on interventions of the international community. In addition, inadequate communication and coordination between the local and central levels regarding the implementation of laws additionally complicates the strengthening of the rights of non-majority communities in Kosovo.

With regard to statistical data, and in relation to the participation of representatives of minority communities in public administration at the central level, the Kosovo Law on Civil Service provides for a threshold of minimum 10% reserved for the employment of representatives of non-majority communities. Unfortunately, in many cases this quota has not been implemented in practice, and the Law has not been fully implemented, which means that there is no full respect for the rights of non-majority communities in Kosovo. In that sense, greater involvement is required from the Office for Community Affairs, which is responsible for monitoring and implementing laws concerning minority communities.
communities in Kosovo. Due to the inadequate redistribution of financial resources for all non-majority communities, it is also necessary to increase the commitment, but also the responsibility of the Office for Community Affairs. Public strategies adopted for the purpose of financial and logistic support to communities in Kosovo do not get applied within a defined time frame, which additionally complicates the process for improving the standards of respect for minority rights.

Taking into account the fact that there is a gap between practical policies at the central level of government and their implementation at the local level\(^8\), the rights of minority communities in Kosovo are not fully respected for administrative reasons, as well as due to lack of information among staff in public institutions. In the case of such a process, there is no control procedure that would (in addition) undertake processing of a violation of community rights. Also, there is no adequate social dialogue on the inclusion of the most vulnerable social groups, including Roma, Egyptian and Ashkali communities. The Consultative Council for Communities should play an important role in this process\(^9\), whose members have so far been active, but without any effective influence on the Government in the field of implementation of laws or practical policies concerning minority communities in Kosovo.

On the other hand, the project that is supported by the Council of Europe - ROMACTED\(^10\) at the local level contributed to improvement of the situation in the area of inclusive policy. Through this program, members of Roma community are involved in the decision-making process at the local level. However, this example of a good inclusive strategy again shows the problem that is created by the fact that progress in respecting and involving members of minority communities is adequate only if there is a sufficient support from international institutions.

In close conjunction with the issue of respecting the rights of non-majority communities is also the right of displaced persons to return. In northern Kosovo, according to some estimates, there are 6,859 internally displaced Kosovo Serbs still living there, while 6,951 internally displaced Kosovo Albanians live in the region of South Mitrovica\(^11\). Regarding IDPs from the Pristina region, they are mainly located in Gracanica/Gracanicë and surrounding villages. The

---

\(^8\) [https://www.coe.int/en/web/portal/home](https://www.coe.int/en/web/portal/home)
\(^9\) [https://www.president-ksgov.net/en/consultative-council-for-communities](https://www.president-ksgov.net/en/consultative-council-for-communities)
\(^11\) UNHCR Statistical Overview – October 2018
remainder of internally displaced Kosovo Serbs is in the Gjilan/Gnjilane region and in collective shelters in the municipality of Shtërpe/Strpce. The process of returning of displaced persons of all ethnicities runs very slowly and it depends on several factors. In the first place, there is still political instability in Kosovo, unresolved interethnic relations, and also a slow process of reconciliation, as well as inadequate implementation of Government measures related to the return of displaced persons. It should also be added that frequent attacks on returnee’s families (especially in the area of western Kosovo and eastern (“Pomoravlje”)) hamper the survival of returnees at their hearths. When all the aforementioned problems are taken into account, it is obvious that there is a number of obstacles that prevent the return of displaced persons in post-conflict Kosovo. Frequent political tensions between Belgrade and Pristina, as well as a number of interethnic incidents, slow down the necessary return of displaced persons.

Given the fact that in year 2018 only 232 members of minority communities\textsuperscript{12} have voluntarily returned to Kosovo, which is the lowest level in last eighteen years, it shows that the situation is quite alarming. Displaced persons who have voluntarily returned remained under the impact of several factors, among which the most difficult is the political and economic environment, as well as the absence of displaced persons from their places of residence over a longer period of time, which made it difficult for them to adapt to the conditions therein. Despite the fact that local and central authorities have tried to highlight the importance of returning displaced persons, with concrete steps taken to support the return process, municipalities have failed to respond to long-term challenges in tackling the problems faced by displaced persons. The essence of this ineffective approach lies in the lack of financial and other logistic and administrative resources.

As one of the burning issues, especially regarding returnees of Roma, Egyptian and Ashkali ethnicities, there are often procedural and administrative problems in obtaining Kosovo documents, as well as confirmation of the status of displaced persons. Additionally, members of these communities, including Serbian, are often victims of sporadic incidents, thefts, which, unfortunately, have not been prosecuted by the police and judicial authorities. The usurpation of private properties, primarily those in urban areas, is still a major problem for all (returnee’s) communities in Kosovo.

\textsuperscript{12} UNHCR Statistical Overview – October 2018
The involvement of international institutions (UNHCR), Kosovo’s non-governmental organizations, and the Ministry of Communities and Returns in activities related to the return of displaced persons often creates conflicts in terms of responsibility and competence. The lack of quality communication between these entities, as well between those and local institutions, makes it difficult to work together on the return of displaced persons.

**Recommendations**

- A minimum threshold of 10% for the recruitment of members of minority communities should be respected, in order to influence their local and central policies.
- Offices, committees and other bodies should engage in protection and promotion of the rights of non-majority communities in a more transparent and active way.
- Increasing financial and logistical support is a key factor that will enhance the capacity of representatives of non-majority communities to protect the rights of communities to which they belong.
- Every case of discrimination should be presented in media, followed with adequate legal measures aimed at combating discrimination and violation of human and minority rights.
- It is necessary to strengthen information campaigns directed at displaced persons, in order to convey the right and useful information to as many members of targeted community as possible.
- International organizations should monitor the weaknesses of Kosovo institutions, and to inform them promptly and advise them on further steps.
- Local NGOs should be engaged in the area of protection of rights to return, as well as assistance to displaced persons, which is really necessary for them. NGOs established by non-majority communities should be more visible and active.
- Strengthening the capacities of employees in local self-government should become a priority of the Government of Kosovo. With an adequate process of support and training, public administration can be trained and informed about the importance and procedures in the area of community rights and the right to return. International organizations such as UNHCR and the OSCE could support this process.
- The need for wider and more serious support of the Kosovo police forces and judicial authorities in the protection of returnees is necessary, due to the frequent and ubiquitous threat to their security and property.
The Silent Departure

When it comes to basic human rights, and in particular the collective political rights of communities, that is, the rights of non-majority communities, it is extremely important to take into account their practical, operational component. The concept and idea of basic human rights and other "generations" of rights: political, social, religious, cultural, sexual, is not only a conceptual-philosophical position and a humanistic-philanthropic paradigm. Rights must have their own pro-active component, i.e. must be codified by the constitution and laws stemming from the language and spirit of that constitution as the highest legal act. But this is only a prerequisite, the same laws that are guaranteed are to be thoroughly implemented on the ground.

However, there is also a third element that is in the context of Kosovo, and even more so with non-majority communities, which is an essential result of those protected rights guaranteed by the constitution and laws. How do the rights impact the life of a community, family, of an individual? That is the real issue, it's the topic in Kosovo when it comes to community rights. Regarding the third element of rights, their effect, one should take in consideration the environment and all relevant factors that could influence and determine whether the rights are exercised at all and, if they are realized, what is the quantitative and qualitative dimension of their impact and performance. This environment forms a broader socio-political context, starting from the legal and political system, to the economic and social system, to the security milieu, up to the socio-cultural context in which certain rights need to have concrete implications. As a basic methodological indicator that there is a problem with the Serbian community in the domain of the realization of guaranteed rights and the qualitative dimension of the impact of the rights, which is a complex and multi-dimensional problem, there is the "quiet departure" of Serbs from Kosovo, with a special focus on young people who are leaving.

In addition to the fact that no political and social subjects in either Pristina or Belgrade, or at international level, at least officially, do not have relevant and methodologically reliable statistics on the number of members of Serbian community in Kosovo with a focus on their migrations since June 1999, it is impossible to note the long-term trend of displacement of Serbs from Kosovo since June 1999. It must be emphasized that one of the basic reasons that there are no relevant data on the number of Serb community members today is the
fact of partial boycott of the 2011 Census in Kosovo by the Serbian community.\textsuperscript{13} Number estimates, rough and methodologically certainly ill-founded, based on the entry into the civil registry and the voter’s list in Kosovo.\textsuperscript{14} These sources may give us some basic information on the number of inhabitants, but not how many citizens have left Kosovo and from which category of population. Therefore, analysis can only be grounded on the basic data, but also on the work of individual NGOs in the community, with a relevant number of interviews with key social entities. Another significant challenge is the generality and omnipresence of this topic in the media and public discourse over the past few years. So much is said, both formally and informally, to get the impression that everything is almost familiar. That’s exactly the researcher’s problem. No one has so far seriously and systematically addressed this issue, the question of young people leaving from Kosovo, mostly educated ones, who represent a significant capacity for their own community (demographic, intellectual, economic, cultural).

What can be determined by simple observation is the trend of increase in migration, given the target group, going outside of Kosovo, for two main reasons:

1. Studies;

However, when we talk about the causes of these migrations, they can’t be reduced to these two causes, the motives of young people to leave Kosovo are definitely extremely complex and multidimensional.

The basic assertion of this analysis is that: the socio-political context and socio-economic conditions are factors in endangering basic human rights as well as the special collective and political rights of the Serbian community in Kosovo, and that one of the most basic indicators, at the same time socially most relevant, is the departure of young Serbs from Kosovo.

The question is: what is the social and political context that in the last decade in Kosovo resulted in departure of young people? It is indisputable that in Kosovo there is a general trend of young people going abroad, regardless of their ethnic community, as well as throughout the Balkans. How come the Serbs,

\textsuperscript{13}\url{https://www.b92.net/info/komentari.php?nav_id=504909}
\textsuperscript{14}\url{http://www.kqz-ks.org/Sr/sherbimet-per-votuesit/lista-votuese/}
despite supposedly guaranteed minority rights, did not want to stay in Kosovo?\textsuperscript{15} The answer lies precisely in the political and social context of Kosovo. This context is complex, and it is made of several destructive structures, factors that negatively impact the achievements and quality of partially realized rights for the Serb community in Kosovo. What matters to the entire Kosovo society, those factors are general, and these are:

1. corruption;\textsuperscript{16}
2. nepotism;
3. partocracy;
4. extremism;\textsuperscript{17}
5. poverty;\textsuperscript{18}
6. non-existence of a self-sustaining economic system;
7. non-consolidation of the institutional apparatus;
8. unresolved issues in the area of transitional justice;
9. lack of social cohesion;
10. unresolved political status;

As a result of the multiplier effect of these destructive structures, there is a process of young people leaving Kosovo. When considering all the listed negative factors, a young and educated person (higher education is not a prerequisite) from Štrpce, Šilovo, Laplje Selo, Osojane, Gračanica, Plemetina, Klokot, Leposavić or Novo Brdo, can't find employment in the public sector (partocracy, nepotism, corruption, problems arising from not knowing the Albanian language), they can't develop their own family businesses in micro environments such as the communities in which Serbs live and work in Kosovo, and the only way out is the decision to leave Kosovo.

This text has already noted that there are no objective methodologically based statistical data that can be referred to, therefore the analysis is based on a rough assessment of the research team, and also it is based on interviews with village leaders, directors of educational institutions, primary and secondary schools, directors of health care institutions, both primary and secondary, and with priests, who, apparently, are the only ones who possess certain quantitative data.

The number of young people who left Kosovo and went directly to the countries of Western Europe, only from the region of Gjilan/Gnjilane, Novo Brdo, Ranilug, Parteš, Klokot, over the past year exceeds 200 young people. This estimate does

\textsuperscript{15}\url{https://www.radiokim.net/vesti/politika/srbi-imaju-najveca-prava-od-svih-nevecinskih-zajednica-u-evropi.html}
\textsuperscript{16}\url{https://www.slobodnaevropa.org/a/kosovo-korupcija-specijalni-sud/29193492.html}
\textsuperscript{17}\url{https://www.berghof-foundation.org/fileadmin/redaktion/Publications/Other_Resources/WB_PVE/CTR_CaseStudy3_kosovo_SR8_407796.pdf}
\textsuperscript{18}\url{https://www.dw.com/sr/siroma%C5%A1tvo-na-kosovu/a-2737149}
not include the number of young people who went to study in Mitrovica North. The new trend, which is also fatal in terms of the demographic perspective of the Serbian community, is the decrease in the number of students who decided to study in North Mitrovica, but instead decided to start their studies in some of the university centers in central Serbia, Nis, Kragujevac, although Belgrade more often becomes the first and only choice.

In central Kosovo and in the “Sirinićka Župa” region (“Cheesemakers’ Parish”, around Štrpce), specifically the municipalities of Gračanica/Gracanicë, with parts of the municipalities of Lipjan/Lipljan, Fushë Kosovë/Kosovo Polje, Prishtinë/Priština and Obiliq/Obilić, where by rough estimates over 20,000 Serbs live, and also the municipality of Štrpce, where up to 10,000 Serbs live, naturally with an obvious tendency of a decline of the population, regardless of the satisfying rate of natural population growth, the tendency of young people leaving has its own peculiarities. According to a rough estimate, due to lack of reliable statistics, the number of young people who left Kosovo, mostly towards central Serbia, is around 200. The feature of migration of young people from central Kosovo compared to the Gjilan/Gnjilane region or to the municipality of Shtërpcë/Štrpce is that from the municipality of Gračanica/Gracanicë, young people tend to decide on migrate to Western Europe, but their first choice is some of the major centers in central Serbia: Niš, Belgrade and also now more often Novi Sad, due to the dynamic economic development of the city.

Regarding migration trends in the north of Kosovo, it can be concluded that they are somewhere between the characteristics of central Kosovo and the region of Gjilan, where a large number migrates to central Serbia, but no fewer people go abroad.

This is unequivocally general trend in Kosovo, young Roma, Albanians, Bosniaks, and not just Serbs, are also migrating. This general trend imposes that the solution can’t be sought separately from community to community, from municipality to municipality, or from region to region, but a common, comprehensive solution has to be found for all young people in Kosovo, because, as a whole, the entire Kosovo society, much faster than anyone currently realizes or supposes in Kosovo, will get into the problem that the Serbian community now faces, which is an issue of not having a future.
Framework recommendations:

- Strengthen the economic capacity of the less developed regions of Kosovo.
- Strengthen financial and logistical support for young entrepreneurs.
- Turning the focus of Kosovo’s politics from daily political disputes to concrete steps aimed at improving interethnic relations and strengthening the economic perspectives.

Security

I. Context and description of the problem

Northern Kosovo has posed many security dilemmas in the post-conflict era in Kosovo, due to its authentic political, cultural and economic development. Moreover, the fact that Northern Kosovo has witnessed institutional dualism (those controlled by Pristina and Belgrade) and political and economic limbo for a longer period of time (especially after the Brussels Agreement has been signed), has made the overall picture vague and complicated. Therefore, such a gap created by the lack of fully implemented monitoring mechanisms over Northern Kosovo has resulted in a wide range existence of nepotism and corruption, which have significantly limited any inflow of economic and social benefits.

It is important to point out that, consequently, such a security vacuum, catalyzed by the friction of two conflicting and ineffective executive powers over Northern Kosovo, produced a constant perpetuation of political crisis. Thus, four municipalities in this region (North Mitrovica, Zvečan, Zubin Potok and Leposavić) have not only decreased their development potentials, but have also become an instrument of political ‘trade’ between Belgrade and Prishtina, mostly for the purposes of propaganda (for the internal use). This exact problem has flared up after the decision of the Kosovo Government to impose 100% tariffs on import of goods produced in Serbia. As a backlash of a newly created crisis, all four mayors in four northern municipalities have decided to withdraw their functions and have broken any (official/legal) communication ties with the authorities in Prishtina. Since then, the political and administrative vacuum in the North has drastically been aggravated. In such circumstances, risky political moves made by official Prishtina and (northern) Kosovo Serb political leaders...
(backed by official Belgrade), have jointly created an economic and humanitarian crisis (the lack of food and medicaments supplies), which influenced all citizens of Kosovo, but especially those living in Northern Kosovo.

The creation of Kosovo Army, approved by the Kosovo Parliament, which gave the Kosovo Security Force – the lightly armed forces the attributes of an army, has become a direct threat to the previously defined security arrangements for the protection of non-majority communities. Thus, this decision has inevitably created security dilemmas among Serb community living in Northern Kosovo. Though KFOR, as an important and trusted international protection service, has not withdrawn from Kosovo, the fact that Kosovo Security Forces have been significantly transformed, not only in terms of its name, has expanded the list of uncertainties burdening Kosovo Serb community. The general feeling among this community has widely been described as threatening to their existence in Northern Kosovo, including Serbs living in enclaves located south of the Ibar river, which share similar concerns.

The security crisis was intensified even more by the official proposal of the Mayor of South Mitrovica (Agim Bahtiri) to amend the Law on Administrative Boundaries of Municipalities with an aim of „unifying Mitrovica“19. Although this decision hasn’t made any practical outcomes in terms of any kind of executive implementation in practice, it has spurred a widespread fear among citizens of North Mitrovica. This initiative was perceived by Serb community of this city as a part of a larger strategy to non-violently expel the rest of this community from Northern Kosovo. With the idea of abolishing the municipality of North Mitrovica, a loss of the last resort of institutional and political protection for the Serb community would be lost.

As previously mentioned, the sole existence of administrative vacuum in the North has become a security issue for itself. In this regard, ethnically motivated incidents have become a severe problem in Northern Kosovo, due to the lack of legal responses and actions against those who were involved in such actions. Dušan Kozarev, a representative of the Office for Kosovo and Metohija of the Government of the Republic of Serbia, stated that Kosovo Serbs have been victims of around 50 ethnically motivated assaults20. In particular, the multiethnic neighborhood called Bosniak Mahala (in North Mitrovica) has been prone to

---

20 https://www.osce.org/odihr/395612?download=true
frequent interethnic incidents, some of which have ended up with victims of violent clashes having serious physical injuries. Despite the daily and nightly presence of Kosovo Police forces and members of KFOR’s Carabinieri units in this area, incidents are still present. Moreover, the absence of adequate legal repercussions against those who broke the law has led members of Kosovo Serb community to feel less safe and is interpreted as an indirect (para)legal pressure on this community.

The unsolved murder of Kosovo Serb politician, Oliver Ivanović, who was shot dead on 16th of January 2018 in North Mitrovica, has become the most representative case of threat to personal security in Northern Kosovo. The fact that this case still hasn’t been solved, with both official Belgrade and Prishtina fueling mutual political accusations in regards to the responsibility for the investigation of the murder, has furtherly deepened the fear among Kosovo Serb and general feeling that crimes against Serbs can go unpunished. Furthermore, the inadequate use of excessive force by ROSU units during the process of arresting three citizens of North Mitrovica (November 2018), who were suspected of being in connection with the murder of Mr. Ivanović has raised the level of tensions in this part of Kosovo. It is generally perceived among Northern Kosovo Serb community that these arrests could have happened without disturbing the peace of common citizens, which they perceive an action that was done purposely to upset the community. In a similar manner, the Kosovo Serb community has negatively reacted on the arrest of Marko Đurić, a negotiator within the Brussels Dialogue, which happened in March 2018 in North Mitrovica.

Apart from threats to personal and community security, it is important to point out the significant risks of environmental pollution in North Kosovo. The Trepča industrial complex produces enormous amounts of industrial waste, which is dumped into rivers of Ibar and Sitnica. It is estimated that in the valleys of these two rivers bear than 150 million tons of industrial waste, lagging behind the decades-long processing of mining in factories of Trepča21. Such a widescale pollution directly exposes 200-300,000 inhabitants (who live around the streams of the Gračanica, Sitnica and Ibar rivers) to the influence of harmful and toxic materials. Unfortunately, due to the political and ethnic divisions of the Trepča industrial complex, proposals or ideas on how to solve the problems caused by the pollution haven’t been found in order to reduce the consequences on the population. Apart from small awareness raising campaign in 2018 conducted by

few NGOs, nothing has been done by the official institutions on both local and central level to improve conditions in the field.

**Recommendations**

- In order to increase the participation of citizens in decision-making processes at the local level there is a need to establish consultative committees in four municipalities with Serbian majority in the North, in accordance with Article 73 of the Law on Local Self-Government.
- International community has to respond to the clear violation of minority rights in a way that avoid mechanisms for their protection.
- Taking into consideration that acts and statements of the Mayor of South Mitrovica and Kosovo MPs could initiate a conflict, authorities should use all legal means in preventing such act of happening.
- Kosovo Police and its investigative bodies should, in regards to the murder of Oliver Ivanović, put aside politically motivated acts in discovering perpetrators, as a way of preventing abuse of this criminal act for political purposes. In this regard, a more effective cooperation should be established between Serbian and Kosovo investigative bodies.
- Kosovo Police Directorate should be in control of the use of ROSU units and act in accordance with the constitutional powers.
- In order to increase the trust in the rule of law, judiciary system has to adequately prosecute perpetrators and publish court decisions related to incidents which are ethnically motivated.
- Negotiators within the Brussels framework should find a sustainable solution for re-registration of the vehicles registered by MIA of Serbia in the light of improved freedom of movement of Kosovo Serbs in Kosovo.
- Kosovo government should revoke the decision for imposition of 100% taxes on products imported from Serbia, as soon as possible as a way of preventing humanitarian disaster which is bound to happen, due to the lack of medicines, as well as to prevent the increase of illegal activities.
- Local municipal authorities should activate implementation of the LEAP (Local Environmental Action Plan).
I. **Context**

The concept of linguistic rights as constituting an indispensable pillar of human, civil, and collective rights has often proved to be contentious, both in theory as well as in practice. In international law, linguistic rights are often grouped into the larger and indeed more extensive framework of cultural and minority rights that are protect both by national as well as supra/international conventions. In this sense, linguistic rights have a multifaceted character in that they enjoy a range of symbioses across a wide spectrum of legal, constitutional, political and indeed social notions. In this sense, speaking very generally, linguistic rights have varying degree of application in institutional, judicial, educational, and indeed in private spheres.\footnote{Kymlicka, Will and Patten, Alan. (2003). "Introduction: Language Rights and Political Theory: Context, Issues and Approaches." In Will Kymlicka and Alan Patten (eds.), Language Rights and Political Theory(pp1-51): Oxford University Press.}

The idea that specific national and/or ethnic groups have a set of rights to language use, which can be separate from that of the majority, gained traction in direct conjunction with the appearance nationalist movements in the late 19\textsuperscript{th} and early 20\textsuperscript{th} centuries pushing for self-determination. Language became a cornerstone in the establishment and the maturation of national self-awareness and therefore an important aspect of the push for specific rights tailored to suit the needs and to defend the position of specific national/ethnic groups within the framework of newly-established nation states. Indeed, the consecration of language rights into international conventions and the constitutional structures of individual states became more and more prevalent in the aftermath of the First World War.\footnote{Bruthiaux, Paul. (2008). "Language rights in historical and contemporary perspective." Journal of Multilingual and Multicultural Development, 30(1), 73-85}

Since then, the idea that minority groups should have the fundamental right to the use of their national languages has become an essential aspect.

**Language Rights in Kosovo**

Kosovo’s laws and constitution extends extensive protections for the right to the use of languages. The legal basis for this is Article 5\footnote{Article 5.1, Constitution of Kosovo, The Official Languages of Kosovo are Albanian and Serbian.} of the Constitution of Kosovo that stipulates the equal status and usage of Albanian and Serbian. The constitutional provisions on language are reflected in the Law on the Use of Language, which sets provisions and conditions for the legal equality of the...
Serbian and Albanian languages at all levels of governance. Furthermore, languages that are spoken by up to 5% of residents of a given municipality have official status and enjoy parity with official languages at the local level. In additional to this, the law stipulates that in municipalities where 3% of the population speak a certain language or where a language is “traditionally” spoken, that language shall have the status of ‘language in official use.’ This is a provision that is distinct to Kosovo.

Aside from the Law on the Use of Languages, a number of other legislative acts regulate language rights in Kosovo:

Aside from this, the Kosovo legal framework also creates a number of legal mechanisms tasked with ensuring the application of the Law on the Use of Languages and that are designed to protect the language rights of all of Kosovo’s ethnic/national communities. Arguably, the most important of these mechanisms is the Office of the Language Commissioner, whose mandate is to monitor and act as a sort of check-and-balance of the Law on the Use of Languages.

II Description of the Problem

Despite the relative strength of Kosovo’s legislative framework (in normative form), the question invariably arises as to whether or not its implementation measures up to the expectations, and whether or not existent policy frameworks are implemented fully in practice. A report issued by the Office of the Language Commissioner in 2015 points to problems stemming from the “mono—lingualism (sic)” of some state employees and other areas of weak implementation of the Law on the Use of Languages.

In general, the Law on the Use of Languages is applied unevenly and irregularly, depending on the institution or the governing body in question. Past studies have found, for example, numerous and egregious translation errors in Kosovo’s Laws, which is particularly problematic because laws can, as a result, be interpreted in entirely different ways. Furthermore, the availability of information on and offline in the Serbian language is, at best, variable. For example, the

---

25 Law on Use of Languages (Law No. 02/L-37).
26 Article 2.3, Law on the Use of Languages (Law No. 02/L-37)
27 IBID, Article 2.3
29 Office of the Language Commissioner of Kosovo. Monitoring and Evaluation of Language Rights in Kosovo, 2015, pg. 79

Ministries of Labor and Social Welfare, Justice, Economic Development and the Office of the Prime Minister all have Serbian-language websites that do not offer the same depth and scope of information as the Albanian versions.\(^{31}\) This is indicative of a larger problem that the government faces in the provision of information in Serbian and indeed calls into question its capacities to provide quality translations of other internal and external documents.

**Recommendations**

Kosovo’s laws and legislative framework provides basis for progressive and effective language policies. That having been said, there seems to be a lack of political will, pressure and material resources to create solid foundations for more comprehensive practical application. Taking this into consideration, the following recommendations can be made:

- More effective coordination and cooperation between governing institutions and The Office of the Language Commissioner as a key actor and as an essential advisory body that is capable of providing guidance;
- More financial investment and the development of strategies geared at strengthening the capacity of state institutions to provide quality translations of legal, administrative and other documents;
- In coordination with the Office of the Language Commissioner the Government of Kosovo should work to establish a more effective oversight mechanism in the drafting and translation of legislation;
- Closer involvement of civil society organizations in the establishment of monitoring mechanisms for the implementation of the Law on the Use of Languages in local governing institutions;
- More vigorous informational campaigns aimed at the general public to increase their knowledge of existent mechanisms designed to protect their language rights;

\(^{31}\) Based on a review of Ministerial websites conducted by NGO AKTIV, March 2018.
Access to Documents

I. Context and description of the problem

An essential cornerstone of the state-building project in Kosovo in recent years has been an effort to guarantee the full and unobstructed application of Kosovo’s legal and constitutional framework and indeed the establishment of a system of governance and institutional structures that are able to respond effectively to the needs of its citizens and foster an environment that allows rule of law to take root. This rather lofty goal has been beset by numerous tribulations that are the direct result of a complex historical and political context that is rife with still-unresolved inter-ethnic tensions. Notwithstanding the apparent goodwill of international actors and the political elite, the government of Kosovo itself has, in the past, acknowledge the scale and the scope of the problem at hand. It particular, it stressed the complexity of establishing full rule of law in Kosovo since the cessation of hostilities in the early 2000’s. What’s more, the implementation of the legal code, normative acts and indeed the constitutional itself has been, at best, unevenly distributed among various layers of governance, a fact that has been recognized numerous times by the European Union and other missions present in Kosovo.

One of the most glaring issues faced by the Kosovo government has been the creation of an institutional system that is capable of implementing laws related to the protection of minority groups and communities. Although the overall reach of laws related to minority rights is wide, and not all of them necessarily effect the day-to-day lives of their members, there are problems that have severely hindered many from having full access to their legal and constitutional entitlements. Chief among them has been the problem of access to personal documents, an issue that has evaded a long-term and viable solution.

This document will give an overview to challenges faced by Kosovo Serbs in achieving access to the following types of documents:

- Citizenship documents;
- Personal identity and travel documents (passports and IDs);

---

• Other personal documents such as but not limited to: marriage certificates, birth certificates and death certificates

Generally speaking, this problem has the following key dimensions:
• The fact that, until August of 2018, the Kosovo government treated all forms of documentation issued by Serbian (parallel) institutions in Kosovo as illegitimate;
• Serbs from Kosovo in possession of documents issued by the Coordination Administration found themselves in a situation in which their travel and identity documents were deemed invalid and illegal by Kosovo institutions and government despite the fact that this did not have a legal basis;
• Internally displaced persons (IDPs), and those born after 1999, particularly in the north of Kosovo, faced and continue to face challenges in obtaining Kosovo citizenship and citizenship documents;
• Border authorities in Kosovo do NOT accept passports issued by the Coordination Administration valid for international travel, this is not based on any existent legislations and seemingly restricts freedom of movement;
• The failure of the Kosovo government to establish a fully operational civil registry service in the north\(^{34}\) that has the institutional capacity to ensure the integration and registration of Kosovo Serbs into its institutional framework;
• The fact that Civil Registry Offices in the north of Kosovo are either partially or non-operational

Before August of 2018\(^{35}\), institutions and governing organs in Kosovo did not (in practice but not in law) accept personal documents issued by soft ‘parallel’ institutions as proof of residence and/or of right to citizenship. As stated in NGO AKTIV’s input(s) to the European Union in January of 2018: It would seem that one potential justification or basis for this was an oral statement given by Edita Tahiri in 2016\(^{36}\) and \(^{37}\) in which she stated that any and all documents issued for Serbs living in Kosovo were illegal. Despite this, there was not formalized law or administrative order and/or instruction that outlined or mandated this practice. Compounding this is a still existent practice among Kosovo authorities, particularly border and customs agents, of not accepting passports or identity documents issued by the Coordination Administration of the Serbian government, as valid for international travel. The origins of this practice are again oblique, but nonetheless serve to severely hinder the freedom of movement for those affected. This is, at its very core, an issue of rule of law and of good governance to the extent that it is reflective of irregular institutional

---

\(^{34}\) https://www.eulex-kosovo.eu/eul/repository/docs/106075-CPR-2018-En.PDF
\(^{35}\) When the Ministry of the Interior issued an order that Kosovo institutions should accept documents issued by Serbian institutions in Kosovo as proof of residence
\(^{37}\) http://prishtinainsight.com/documented-yet-invalid-mag/
practices that have rendered a notable sector of the Kosovo Serb community without recourse to citizenship and/or the documentation necessary to move freely.

II. Recent Developments

- The Ministry of the Interior of Kosovo issued a decision in 2016 that facilitated the exchange of Serbian driver’s licenses issued between June 199 and September 2016 with Kosovo ones. By the end of 2017, 3,686 applications were processed.38
- The Interior Ministry issued instructions under the name entitled Instruction on Criteria that contain evidence about the citizenship of FRY and permanent residence in territory of Kosovo on 1 January 1998. Although they sought to clarify a number of procedures in the process of applying for Kosovo citizenship, they did not state whether or not documents issued by parallel institutions were legally valid for the purposes of proving continuous residency on Kosovo territory.
- In July of 2018, the Interior Ministry issued an administrative order stating that “all citizens of the of Kosovo” can apply for civil registration status acts (births, marriages and deaths) using documents issued by “Serbian structures” in Kosovo39

Although some of these changes have been positive in nature, the order mentioned above entered into force in summer of 2018 and will expire in 2019. Whether or not the order will be extended permanently is uncertain. Furthermore, the order only accepts documents issued up until 2016 (no reasoning for this was outlined in the order.). Thus far, there is little to indicate that this has significantly improved the situation for those Serbs who have experienced difficult in accessing citizenship documents as this order was made with a certain degree of secrecy and, to-date, no effort has been made on the part of the Kosovo government to communicate the change to the Kosovo Serb or other affected non-majority communities. That having been said, a certain amount of anecdotal evidence suggests that the order is being implemented in the municipality of North Mitrovica.

Recommendations:

1. The Interior Ministry of Kosovo should renew the Administrative Order (No.296) when it expires in July of 2019 and clarify provisions that allow for the acceptance of documents issued by Serbian ‘structures’ in Kosovo;

---

38 https://www.eulex-kosovo.eu/eul/repository/docs/106075-CPR-2018-En.PDF
39 Minister of Internal Affairs, Order No. 296/2018, 05/07/2018
2. Administrative instructions ordering that Kosovo border authorities recognize the validity of passports issued by the Coordination Administration, thus allowing for unhindered and unviolated freedom of movement in the region for those possessing them;

3. A comprehensive information campaign needs to be launched in order to better inform and communicate with residents their institutional rights when it comes to access to citizenship and other personal documents – such a campaign would serve to strengthen the link between citizens, governing institutions as well as with mechanisms designed to defend against administrative obstructionism and discrimination. Furthermore, it would increase the overall quality and scope of information publicly available;

4. A comprehensive training program geared at public employees who are tasked with handling citizenship applications that would increase their understanding of their legal obligations and the depth and quality of their knowledge of relevant procedures;

**Minority Quotas**

I. **Context and description of the problem**

Promotion of equal participation of all communities in the organization and conduct of public affairs is one of the most important elements in the promotion and protection of communities’ rights.

The purpose of these analyses is to provide an overview of the legal framework regulating minority communities’ representation in the public affairs in Kosovo and to assess the current status of communities’ representation in the civil service in general.

Furthermore, this report analyses available data against the legal provisions under current legislation in Kosovo to assess whether representation of minority communities is being met at both, the central and municipal levels, in order to determine the extent to which employing public institutions are in compliance with their legal obligations to support and enhance representation of communities in the civil service in Kosovo.
Kosovo Primary Legislation

Constitution of Kosovo stipulates under Chapter III (Rights of Communities and their members) that communities and their members shall be entitled to equitable representation in employment in public bodies and publicly owned enterprises at all levels, including in particular in the police service in areas inhabited by the respective Community, while respecting the rules concerning competence and integrity that govern public administration.\(^{40}\)

Furthermore, the Law of the Civil Service states that all communities and their members have a right to fair and proportional representation in the civil service of central and local level institutions\(^{41}\), based on the underlying principles of non-discrimination, equal opportunities and equal representation (article 5.1.2., 5.1.9. Basic Principles of the Civil Service). The same law further stipulates: within the civil service in institutions of central level the minimum of 10% of positions should be reserved for persons belonging to communities that are not majority in Kosovo and who fulfill the specific employment criteria. In municipal level for qualified members of the community that are not majority in Municipality, the number of reserved working places shall be in compliance with percentage representation of the communities in the given Municipality.\(^{42}\)

In addition, three draft laws that were already identified as important for the process of public administration reform have been approved by the government cabinet on 3\(^{rd}\) September 2018. The Draft Law on Public Sector Salaries, the Draft Law on Public Officials and the Draft Law on Organization of State Administration and Independent Agencies have been prepared and are expected to regulate the functioning and organization of public administration in Kosovo.\(^{43}\)

At the municipal level representation of communities in a local governance is further regulated by the Law on Local Self Governance Nr. 03/L-040 (articles 53.,54.and 55).

Finally, secondary legislation includes many additional regulations with more specific provisions related to representation of communities in conduct of public

\(^{40}\)Article 61, Representation in Public Institutions Employment, Constitution of Kosovo

\(^{41}\)Article 11.2., Admission to the Civil Service, Law on the Civil Service, No.03/L –149, 13 May,2010.

\(^{42}\)Article 11.3., Admission to the Civil Service, Law on the Civil Service, No.03/L –149, 13 May,2010.

affairs, such as, among others, Regulation 4/2010 on Proportional Representation of Communities, Ministry of Public Administration and Regulation No. 02/2010 for the Municipal Offices for Communities and Return.

Based on the findings presented in OSCE report on Representation of Communities in the Civil Service in Kosovo from May 2017, there are still misunderstandings among central level institutions whether quote of 10 percent, guaranteed by Kosovo legislation for the representation of communities, is to be respected and implemented by each specific central level instruction or it is related to overall representation of communities among all institutions at central level.44

This issue is expected to be overcome with a new proposed Draft Law on Public Officials no. 06/L-114 that will abolishe perviousLaw on the Civil Service No.03/L – 14945. The Draft Law on Public Officials establishes the legal framework for employment of public officials in the institutions of Kosovo based on merits, moral integrity, impartiality and sustainability.

The Draft Law on Public Officials stipulates following:in central public institutions, at least ten percent (10%) of job positions in all categories of public officials46 should be filled in by members of non-majority communities in Kosovo and who meet admission criteria, while at the municipal level, fulfillment of number of job positions for members of communities will be in accordance with percentage of population in that municipality.47

II. Description of the Problem

The OSCE report on Representation of Communities in the Civil Service in Kosovo from May 2017 further assessed that the overall percentage of representation of communities in public administration at the central level (18 central level institutions- subject of an assessment) do not reach the 10 percent. In December of 2015 it was 9.63 percent48. However, this figure is not significant increase comparing to 7.85 percent in 2013, OSCE.49 In addition, the percentage of representation of communities differs from institution to institution. Ministry for Communities and Return is an exception with the level of representation of

44Representation of Communities in the Civil Service in Kosovo, OSCE, May 2017., page.11.
46Civil Service employee, Public Service employee, Cabinet employee and Administrative and support staff
47Article 9,Representation of Communities, the Draft Law on Public Officials
48Ibid.
49Representation of Communities in the Civil Service in Kosovo, OSCE, 2013.
communities being at around 45 percent⁵⁰, while representation of communities in majority of institutions at central level is still bellow 10 percent.

In addition, the fact that a majority of institutions lack a systematic approach in obtaining and providing this data adds another prospective to the problem of monitoring the implementation of current legislation with respect to the representation of communities in public affairs.

Findings from different international and local organizations/institutions show that communities are not sufficiently represented in the public administration in most of the municipalities in Kosovo, and in particular when assessment was done for the individual participation of each of the communities that live in the municipality.

The representation of communities' in public administration at municipal level is mainly implemented through other mechanisms foreseen by the Law on Local Self-Government, like the Deputy Mayor for Communities, Deputy Chairperson of the Municipal Assembly for Communities and the Municipal Communities Committee. Although mechanisms for the implementation of representation of communities at municipal level envisage specific quotas for minority communities based on the percentage of inhabitants of the minority communities, they do not necessarily reflect actual situation as they are based on statistic data obtained by most recent consensus that was boycotted in a considerable manner by Serbian community.

**General recommendations**

Taking into consideration the importance of reliable data for monitoring implementation of current legislation with respect to representation of communities in public administration, it might be concluded that additional assessments, more structured and strategically undertaken to cover wider range of institutions at both, central and municipal level, are highly recommended and necessary. This is rather based on the fact that existing analyses do not reflect situation in all institutions, but limited number of sample institutions, and do not include assessment of publicly owned enterprises at all levels.

A further recommendation is related to necessary improvements with respect to the establishment of a more systematic approach to obtaining and providing

---

⁵⁰Representation of Communities in the Civil Service in Kosovo, OSCE, May 2017., page.11.
data by public institutions that will enable more efficient monitoring of the implementation of current legislation with respect to representation of communities in public affairs.
Sadržaj ove publikacije je isključiva odgovornost NVO Aktiv i ostalih organizacija koje su doprinele njenom kreiranju i ne može se ni na koji način smatrati kao stav donatora.

Përmbajtja e këtij botimi është përgjegjësi ekskluzive e OJQ-së Aktiv dhe organizatatave të tjera që kanë kontribuar në hartim dhe në asnjë mënyrë nuk mund të konsiderohet si qëndrim i donatorëve.

The contents of this publication are solely the responsibility of NGO Aktiv and other organizations that contributed to its creation and should not in any way be seen to reflect the views of donors.