



## Initial Assessment and Final Conclusion

### 129 Roma in Kosovo v. Norwegian Church Aid

#### 1. Executive Summary:

129 Roma in Kosovo allege that Norwegian Church Aid (NCA) is in breach of the OECD Guidelines on general policies, human rights and environment for not having prevented exposure to serious and lethal health risks due to detrimental conditions in the camp that it managed. NCA was responsible of managing the camp, first on behalf of UNMIK as responsible authority and later on behalf of the local government. The camp was established before NCA took over as camp manager, and has been a facility where the Roma families are free to live or leave. NCA informs that it has used the information on health risks, including the level of lead poisoning, in its advocacy work towards the UN and EU in Kosovo for the relocation of Roma families away from the area and closure of the camps, without avail.

The Norwegian NCP concludes that this specific instance is not against an enterprise in the sense of the Guidelines for Multinational Enterprises, and thus is inadmissible. The Norwegian NCP received support for this assessment at the OECD Annual NCP Meeting 27 June 2011. The Norwegian NCP has not considered the substance of the claim or whether the OECD Guidelines have been breached, as it is concluded that the complaint does not merit further consideration by the Norwegian NCP.

The Norwegian NCP received support for this assessment at the OECD Annual NCP Meeting 27 June 2011<sup>1</sup>. The Norwegian NCP has not considered the substance of the claim or whether the OECD Guidelines have been breached, as it is concluded that the complaint does not merit further consideration by the Norwegian NCP.

#### 2. The complaint:

The Norwegian NCP received on 22. June 2011 a complaint against a Norwegian NGO, Norwegian Church Aid. The complaint was submitted by Dianne Post, Attorney at Law in the US on behalf of 129 Roma individuals.

The specific sections of the Guidelines that the complainants consider the company to be

---

<sup>1</sup> OECD National Contact Points Annual Meeting 2011/ Chair's Report

breaching are as follows: Chapter II; General Policies (A) number 1, 2, 5, 10, 11, 12 and 14 and Commentary, p. 22, Chapter IV; Human Rights number 1, 2, 3, 4, 5 and 6 and Chapter VI; Environment number 3, 4 and 5.

The complaint concerns the conditions in the camps, including unhealthy lead levels in the water and the contaminated ground resulting in health emergencies. Inter alia, the complainants became seriously ill; some children were born with retardation and other damages. Some women, as a consequence, felt forced to conduct high risk abortions, some self-induced. Medical examinations of the Roma concerned found high levels of toxic lead and other heavy metals, including antimony, arsenic, cadmium, zinc, vanadium and magnesium, as well as low levels of selenium, essential for inactivating toxic heavy metals. At least three people, but perhaps as many as 33 have died from lead related symptoms. In addition to the problems related to the dangerous placement of the camps, inhabitants reported frequently foraging through the garbage in search for food and inability to meet their basic hygienic requirements. It is alleged that NCA knew of the harm to the internally displaced Roma and was asked to assist their removal to a safe place for treatment and to obtain necessary medical assistance, which the Roma claim that NCA ignored.

The complaint sums up that NCA, as an enterprise has a responsibility to do due diligence in seeking to end or mitigate violations of human rights as outlined under the Guidelines. The factual question is whether NCA did that. The Roma say no; NCA says yes. The complainant argues that the factual question should be examined by the Norwegian NCP.

### **3. Norwegian Church Aid's response to the complaint:**

Norwegian Church Aid informs that it acted as camp manager with responsibilities for maintenance, management, activities for children and women as well as providing health services with nurse and established health clinic in the Roma Mahala area from 1999- 2009. In addition NCA constructed housing facilities for Roma in the Roma Mahala area, in total 96. NCA was initially not camp manager of Osterode, and daily operations were run by the Roma people themselves. Upon request of the Roma and then secondly by agreement with UNMIK, NCA accepted camp management in 2005, and became a mentor-facilitator for camp committees, service provider of water, sanitation, food, social services, medical education support, shelter maintenance.

NCA maintained high standards and were advocates for the return process and for medical lead remediation of Roma impacted by lead pollution after living six years on Zitkovac factory area prior to moving to Osterode in 2006.

Basic infra structure services at Osterode were at a higher level (access to water, electric, heating) than the rest of Mitrovica. NCA had good relations with the IDP Roma, with UN, with Municipality authorizes in both the North and the South. When requested

by the Roma, NCA intermediated between the Roma and the “Serb National Council “ in North Mitrovica.

The Osterode facility is physically integrated in the center of Mitrovica town with residential community apartment blocks being only 20 meters from the gate of Osterode, and local secondary school and centre of town 80-100 meters . In 2005, WHO contracted an American company to make test samples and analysis of the earth levels for lead pollution in Mitrovica town North and South – including Roma Camps Cesmin Lug/Kablar also including the KFOR base of Osterode. Osterode earth samples (80% of the camp was asphalted and 95% after becoming a Roma IDP center) were tested showing similar high levels of lead pollution as in all of Mitrovica generally and not higher. The single biggest pollution factor for the entire Mitrovica town area was dust blown over the town from the slag piles. All residents in Mitrovica were equally jeopardized. The highest lead levels in North Mitrovica town area were registered in the Bosanska Mahalla area where the NCA office was located at that time.

Norwegian Church Aid advocated since 2000 on behalf of the Roma for appropriate relocations sites, for medical treatment and to find available land and income generating opportunities which would enable all families to be relocated and the camps permanently closed.<sup>2</sup> In addition NCA constructed housing facilities for Roma in the Roma Mahala area in southern Mitrovica. NCA started a job creation program for Roma in Roma Mahala in order for this location to be more attractive and lives of families more sustainable.

Relocation of the families required available land and construction of houses. The Mitrovica area is a highly politicized and challenging area to get available land for building houses.

NCA sought to find additional land to Roma Mahala since May 2008 by visiting authorities in the north and south. NCA conducted negotiations with the government in Kosovo for making land available and applied to several donors for construction of houses to resettle the last families from Osterode. The last proposal for construction of remaining houses was declined by local authorities in 2009.

NCA finally point out that one of the complainants, never lived in any of the N. Mitrovica IDP Roma camps, including Osterode. The individual concerned was hired by NCA in 2006 as a member of the Camp Management Team. He did have previous residence in other Roma IDP Camps in southern Kosovo –but never in N. Mitrovica municipality. At the time of his employment with NCA in 2006 he was asked if he had any prior residence periods in N. Mitrovica camps and/or family in the N. Mitrovica camps. At that time he

---

<sup>2</sup> Annual report from NCA to UNMIK 2008

answered “No” to both enquires, which made him eligible for employment in the management team of the Mitrovica camp.

#### **4. Background:**

Before the Balkan conflict (1990-99) the Roma lived in the southern Mitrovica, and after the conflict they lived in three camps in the north of Mitrovica. The camps were located 3 km from the Trepca smelter and 300 meters of two mine tailing sites. The Trepca smelter was established in 1930 and closed in 2000. The extracted metals include zinc, arsenic, lead and cadmium.

In 1999, by request of the Roma leaders, NCA provided some camp management services. In the period 2002-2005 Zitovac was considered an ordinary settlement, and not a camp. In this period NCA became lead agency for UNHCR with focus on resettlement. NCA monitored Zitovac in this period but did not run the camp. In 2005 Roma families were relocated from Zitkovac camp to Osterode due to high levels of lead in the camp. The original relocation plan was for Roma to live in Osterode camp for 45 day, up to maximum 1, 5 years while new shelters/dwellings were built after they were relocated from Zitkovac. The camp was run by Roma leaders, who asked NCA to assume the administrative responsibility for the camp, which NCA did in 2005. There was no forced detention in the camp where the Norwegian Church Aid provided health, social and other services. The individuals that lived in the camp could leave if they wanted; there were no guards other than for their own security. However, due to their economic situation and the political situation in general, their choices for alternative places to live were and remain limited.

Norwegian Church Aid closed their operations in Kosovo in 2009. These services were from 1. January 2009 continued by a local NGO by request from local authorities. 1. May 2008 UNMIK transferred the responsibility for the camp management to local authorities<sup>3</sup>.

#### **5. Is Norwegian Church Aid a multinational enterprise in the sense of the OECD Guidelines?**

The Norwegian NCP decides that the complaint is to be based on the OECD Guidelines of 2000<sup>4</sup>. The key point in this case is whether there is any enterprise<sup>5</sup> involved in this case or not.

The Norwegian NCP invited the response of the claimant to the draft initial assessment that the claim was beyond the scope of the OECD Guidelines on MNEs. The complainant

---

<sup>3</sup> Ministry of Communities Returns and Minority Affairs of Kosovo

<sup>4</sup> Cases submitted to the Norwegian NCP after 1. September 2011 will be examined on the basis of the updated OECD Guidelines adopted on 25. May 2011.

<sup>5</sup> as understood by the OECD Guidelines of 2000

responded promptly<sup>6</sup>, and underscored that to rule out humanitarian groups from the application unjustly narrows the definition of the OECD Guidelines. Furthermore that it is irrelevant whether NCA was working under the auspices of the UN. The complaint does not seek to apply OECD guidelines to the UN but only to the behaviour of NCA. NCA is responsible to Norwegian laws and regulations. Finally, the Guidelines are clear in General Policies, especially 14, IV and VI that the enterprise has a duty to intercede with relevant stakeholders when human rights are violated even if they themselves are not the violators.

The complainant alleges that Norwegian Church Aid is a multinational enterprise whose acts impact Norway, and that the claim therefore is admissible for the Norwegian NCP for the OECD Guidelines for Multinational Enterprises. The complainant admits that Norwegian Church Aid is not a "business" as such, but argues with the fact that Norwegian Church Aid is a Norwegian organisation that receives nearly half its money from public funds and spends most of the money operating internationally in several different countries. It is alleged that Norwegian Church Aid is a mixed enterprise as 50% of its money comes from the state. Furthermore that a plain reading of the OECD text "companies or other entities" show that more than commercial companies were intended to be covered by the Guidelines. The narrow interpretation only to commercial companies is not correct since no such limits appear in the Guidelines. The claims to follow UN orders are not valid defence, as they have a responsibility in their own function.

Norwegian Church Aid responds that their organisation in general and the project in Kosovo in particular are humanitarian and not for profit and thus that they are not to be considered a multinational enterprise in the sense of the OECD Guidelines. They also claim that their responsibility for the situation for the persons concerned was limited as they were providing services for the UN and the state of Kosovo. When they realised that they could not better the situation for the persons they were there to help despite intense efforts, they decided to terminate their project in 2008/2009.

## **6. The Norwegian NCPs assessment:**

The Norwegian NCP refers to Chapter I (3) under the 2000 version of the Guidelines which points towards a definition of multinationals in the sense of "companies" with an economic focus, operating in more than one country: *"A precise definition of multinational enterprises is not required for the purposes of the Guidelines. These enterprises operate in all sectors of the economy. They usually comprise companies or other entities established in more than one country and so linked that they may coordinate their operations in various ways. While one or more of these entities may be able*

---

<sup>6</sup> E-mail 17 August 2011

*to exercise a significant influence over the activities of others, their degree of autonomy within the enterprise may vary widely from one multinational enterprise to another (...) Ownership may be private, State or mixed. The Guidelines are addressed to all entities within the multinational enterprise (parent companies and/or local entities). According to the actual distribution of responsibilities among them, the different entities are expected to co-operate and to assist one another to facilitate observance of the Guidelines."*

There are no specific references to complaints against non-commercial organisations in the *travaux préparatoires* of the negotiations in 2000.

The OECD Committee on International Investment and Multinational Enterprises (CIME) and its Working Party issued following statement in April 2003 on the scope of the Guidelines (2000):

*"First, the Guidelines are an Annex of the OECD Declaration on International Investment and Multinational Enterprises. The fact that they are part of the Declaration and that oversight responsibility for them has been assigned by the Council to the CIME -- the body charged with responsibility for the Organisation's work on investment and multinational enterprises -- indicates the investment intent of the drafters of the instrument.*

*Second, the Guidelines are a major corporate responsibility instrument that draws on and reinforces an established body of principles dealing with responsible business conduct. These principles reflect common values that underlie a variety of international declarations and conventions as well as the laws and regulations of governments adhering to the Guidelines. As such, these values are relevant to the activities of multinational enterprises. Thus, as it has already done in a number of areas, the international community may continue to draw on the values underlying the Guidelines in other contexts.*

*Third, the Guidelines have been developed in the specific context of international investment by multinational enterprises and their application rests on the presence of an investment nexus. When considering the application of the Guidelines, flexibility is required. This is reflected in Recommendation II.10 and its commentary that deal with relations among suppliers and other business partners. These texts link the issue of scope to the practical ability of enterprises to influence the conduct of their business partners with whom they have an investment like relationship. In considering Recommendation II.10, a case-by-case approach is warranted that takes account of all factors relevant to the nature of the relationship and the degree of influence. The fact that the OECD Declaration does not provide precise definitions of international investment and multinational enterprises allows for flexibility of interpretation and adaptation to particular circumstances."*

The Norwegian NCP interprets the scope of the OECD Guidelines in the context of the OECD Guidelines being part of the Investment Declaration, overseen by the OECD Investment Committee and thus that they require a business nexus.

This particular NGO is registered in the Norwegian Official Register, not as a Business Enterprise, but in the Register for Voluntary Organisations. The organisation was

registered by Norwegian authorities in 2010 as a non-for profit organisation, based on the organisation's Articles of Association.

Norway presented the case for the OECD Investment Committee at the Annual Meeting of the NCP in Paris 27 June 2011. Norway received support for the view that it is clear that this specific instance is not against an enterprise in the sense of the Guidelines for Multinational Enterprises, and thus is inadmissible. The Norwegian NCP has not considered whether the OECD Guidelines have been breached, as it is concluded that the complaint does not merit further consideration by the Norwegian NCP. Since the Guidelines are not legally binding, this assessment is not appropriate for litigation purposes.

## **7. Final Conclusion**

The Norwegian NCP concludes, with the support of the OECD Investment Committee, that this Specific Instance does not fall within the scope of the OECD-Guidelines.

Gro Granden

Jan Erik Korssjøen

Elin M. Myrmel-Johansen

Hans Petter Graver (Head)

Norwegian Contact Point for Responsible Business

Oslo, 30 August 2011

### Attachments

1. The Norwegian NCP process in this Specific Instance
2. Details on the parties involved
3. Information about the Norwegian NCP and the OECD Guidelines
4. The complaint
5. The response to the complaint

## **ANNEX 1 Details of the Norwegian NCP process in this specific instance**

On 22 June 2011 the Secretariat of the Norwegian NCP received the complaint against Norwegian NGO, Norwegian Church Aid from Dianne Post, Attorney at Law in the US on behalf of 129 Roma individuals. The Secretariat the same day acknowledged receipt, forwarded the complaint to the members of the Norwegian NCP and the Secretariat of the Investment Committee of the OECD as well as to the Norwegian Church Aid.

On 28 June the Secretariat of the NCP presented the case at the plenary session of the OECD Annual NCP Meeting.

30 June Norwegian Church Aid responded to the Norwegian NCP through telephone and e-mail with information attached.

16 August the Secretariat of the NCP forwarded a draft Initial Assessment. Response was received from the complainant 17 August and the complained 23 August.

On 30 August the Specific Instance was presented for the members of the Norwegian NCP, of which none were considered disqualified by the NCP which is a collegiate body. The Initial Assessment of the Specific Instance was unanimously concluded that the case did not merit further examination by the Norwegian NCP and that the final statement was to be issued and made public. The document was submitted for translation check.

On 26 September all concerned parties were informed about the outcome. The Final Statement was made public 27 September on [www.responsiblebusiness.no](http://www.responsiblebusiness.no).

## **ANNEX 2 Details of the parties involved**

### **1. The Respondent: Norwegian Church Aid**

Norwegian Church Aid began in 1947 as a small fundraising drive by Norwegian churches and is now one of the Nordic countries' largest development aid organisations. It is registered in Norway with its main office in Oslo, with 153 employees in Norway and 622 (959 incl. Darfur) employees abroad. In 2007 revenue was NOK 610.5 million, administration costs NOK 63.3 million (8.8 %), international projects constituted 87, 1 %, administration: 9,6 % and fundraising: 3,3 %. \$460,000 of the \$799, 000 budget is from public funding.

The Board of Delegates is the supreme organ of Norwegian Church Aid, and comprises:

- Delegates from each diocese of the Church of Norway
- Seven members of the Church Council of the Church of Norway (whereof one representative of the Saami Church Council and a youth representative under the age of 25)
- Five representatives of nationwide home mission organizations and organizations for children and youth
- One representative from each of the following organizations: the Evangelical Lutheran Free Church, the Free Evangelical Congregations, the Baptist Union of Norway, the Norwegian Mission Society, the Salvation Army, the Norwegian Methodist Church and the Pentecostal Movement in Norway.  
NORME and Global Aid Network meet as observers

### **2. The Complainant (attorney Diane Post on behalf of 129 Roma in Kosovo)**

(129 Individuals are not to be disclosed due to request from the complainant)

Attorney representing the complainants

Dianne Post, Attorney at Law

1826 E Willetta St, Phoenix, AZ 85006-3047, USA

602-271-9019, postdlpost@aol.com, www.diannepost.net

Dianne Post has been representing this group of Roma since 2005 when she worked at European Roma Rights Centre in Hungary.

### **Annex 3: PROCEDURES ACCORDING TO THE OECD GUIDELINES**

#### **1. General information about the Norwegian NCP's application of the OECD Guidelines for Multinational Enterprises**

Updated OECD Guidelines for Responsible Business Conduct were adopted at ministerial level on 25 May 2011. The initial assessment is however based on the previous version of the Guidelines as the complaint was submitted before 1 September 2011, when the new version of the Guidelines enters into force for the Norwegian NCP.

The Guidelines comprise a set of voluntary principles and standards for responsible business conduct in various areas including disclosure, employment and industrial relations, environment, combating bribery, consumer interests, science and technology, competition, and taxation.

The Guidelines are not legally binding. However, OECD governments and a number of non-OECD members are committed to encouraging multinational enterprises operating in or from their territories to observe the Guidelines, while taking into account the particular circumstances of each host country.

The Guidelines are implemented in adhering countries by National Contact Points (NCPs), which are charged with raising awareness of the Guidelines amongst businesses and civil society. NCPs are also responsible for dealing with complaints that the Guidelines have been breached by multinational enterprises operating in or from their territories.

#### **2. General information about the Norwegian NCP complaint procedure**

The Norwegian NCP complaint process is broadly divided into the following key stages:

(1) Initial assessment – This consists of a desk-based analysis of the complaint, the company's response and any additional information provided by the parties. The Norwegian NCP uses this information to decide whether further consideration of a complaint is warranted;

(2) Conciliation/mediation OR examination – If a case is accepted, the Norwegian NCP offers conciliation/mediation to both parties with the aim of reaching a settlement agreeable to both. Should conciliation/mediation fail to achieve a resolution or should the parties decline the offer, the Norwegian NCP will examine the complaint in order to assess whether it is justified. Fact finding or other services to support the processing of the case may be commissioned by the NCP if deemed necessary by the NCP;

(3) Final statement – If a mediated settlement has been reached, the Norwegian NCP will publish a final statement with details of the agreement. If conciliation/mediation is refused or fails to achieve an agreement, the Norwegian NCP will examine the complaint and prepare and publish a final statement on whether or not the Guidelines have been breached and, if appropriate, recommendations to the company for future conduct.

The complaint procedures, together with the Norwegian NCP's initial assessments, final statements and follow-up statements, are published on the Norwegian NCP's website:

[www.responsiblebusiness.no](http://www.responsiblebusiness.no)

**ANNEX 4****The complaint** (separate attachment)**ANNEX 5****The response to the complaint** (chronology provided by the Respondent)

NCA Camp Management for Roma in Kosovo 1999-2005

In 1999, by request of the Roma leaders, NCA provided some camp management services. These continued until 2002 and then again in 2005.

NCA was the 1st INGO in 2000 (letter from NCA to UNHCR ) to protest the relocation of RAE displaced populations to the Zitkovac area due to the possibility of lead pollution. Likewise in the following 2-3 years NCA was a strong advocate for rebuilding of Roma residences in the south, while actively supported reconciliation efforts (N-S Mitovica ) as linked to the issue of the Roma.

In 2005 NCA's Representative sat in the WHO steering committee and advocated for implementation of blood testing and supported and demanded that WHO implement medical remediation. Both of which were implemented in 2005.

NCA was also crucial in blocking all efforts at "sub standard" IDP camps proposed in the South (by S. Mitrovica) and was a strong advocate for international standards in Roma camps and for international standards at Osterode.

Osterode 2005- 2009:

In December of 2005, NCA was invited by Roma IDP leaders of Cesmin Lug/Kablar , Zitkovac and Leposavic to assume a "camp management role" . NCA signed an agreement with the Roman leaders. NCA accepted but informed that – NCA was commitment to international standards, addressing protection and gender issues, human rights and would advocate such with and for the Roma community. Likewise NCA strongly advised all IDP Roma communities to stop illegal battery smelting which was still ongoing.

NCA obtained funds using funds provided to NCA from UNHCR-Angelina Jolie and these services were implemented. NCA also established fire protection training of in-camp "fire wardens" and provided firefighting equipment in all Leposavic , Ziktovac, Cesmin Lug /Kablar camps. Flood relief assistance was also implemented by NCA as Cesmin Lug/Kablar were often impacted by spring flooding of the Ibar river.

In 2005 NCA fire fighting equipment and in camp training at Kblar is primarily responsible for saved lives and a lot of property during the fire that destroyed the camp . Noting that Roma camp residents and using NCA training and fire extinguishers controlled the fire so as to save lives and family property . Leposavic RAE Camp also saved lives using NCA fire fighting equipment and training during the fire of 2007.

In 2005, IDP Roman leaders requested NCA to facilitate information to the Roma from UNMIK and local authorities as Zvecan municipality had issued a closure order for Ziktovac camp due to the factory pollution environmental issues brought up by the international community.

At the same time UNMIK requested NCA to participate as an independent resource protection consultant member in UNMIK Mitrovica Action Team (MAT) planning for eventual relocation of Zitkovac camp which was subject to closure by Zvecan municipality. NCA role as “protection consultant” in UNMIK MAT was requested and approved by IDP Roma leaders who also attended the round table meetings. December 2005: Norwegian Church Aid is designated by UNHCR as manager of the camps in Cesmin Lug and Osterode. KFOR hands over the Osterode camp (land and housing facilities) to UNMIK.

In 2005 NCA’s Representative sat in the WHO steering committee and advocated for implementation of blood testing and supported and demanded that WHO implement medical remediation. Both of which were implemented in 2005.

in 2005 after the analysis of the blood levels – UNMIK approved a very large budget to address medical remediation of lead – this program provided specialized foods (distributions implemented weekly in 2005-2007) that would support remediation . However, the largest budget was for the blood testing and medical remediation program –organized from Osterode but serving all Roma in Mitrovica municipality (north and south) . Medical staff –(doctors and nurses) were employed also consultant doctors from WHO.

Initially in 2005 the Roma said yes to both the food and medical remediation interventions – and children were being treated at the Mitrovica hospital and clinics . However, after a short time the Roma refused the medical remediation (they continued to get the food distributions) Roma leaders (under a lot of support agitation from Paul Polanski’s organization) demanded that all Roma be provided treatment in Germany and or Canada. As such from 2006 -Roma parents refused to send their children to the medical remediation program with the hopes that this “pressure” would result in visas for the Roma to go to western European countries.

#### 2006:

In 2006 UNMIK had several options for relocation of Zitkovac IDPs : to areas outside of Mitrovica and or areas in the North Mitrovica town area or South Mitrovica town. IDP Roma primarily wanted a relocation to Canada and or West Europe. This was unrealistic and outside of the mandate of UNMIK. IDP Roma rejected relocation to areas outside of Mitrovica town areas as many were employed in the town.

IDP Roma were also skeptical about a camp in South Mitrovica –also noting that their security fears were very relevant. NCA also vetoed the South Mitrovica camp proposal concept as forwarded by local authorities as the camp design did not meet International Standards. Likewise the area in South Mitrovica suggested by the local authorities was tested (by an American company ) and showed extra high lead pollution levels.

Osterode: Osterode facility in North Mitrovica town offered an area that met the basic criteria of the IDP Roma – to stay in N. Mitrovica center town area. Likewise Osterode had never been used as a factory area and most of the physical areas of the Osterode

facility had been previously asphalted thus limiting human contact with polluted land which as noted above is a general problem in all of Mitrovica town .

In Osterode the Roma again requested that NCA implement the Camp management services - as NCA was viewed by the Roma as impartial an a service provider with high professional standards and advocacy.

Originally, many of the IDP Roman were not positive to an Osterode relocation as it was felt that this would weaken the demand to be relocated aboard. However, in March 2006 – Zitkovac and Kablar Roma IDPs decided to relocate to Osterode . UNMIK requested NCA –as Roma Camp Management - to facilitate the relocation exercise. NCA declined stating that this was not a mandate of NCA. NCA did receive the Roma in Osterode and at that time Roma relocated in Osterode requested NCA to assume camp management responsibilities.

### 2008

May 2008: Norwegian Church Aid continues to act as manager of the Cesmin Lug and Osterode camps. Some displaced Roma from the Mahalla have been resident in lead contaminated camps for more than 8 years.

### 2009

January 2009: Norwegian Church Aid hands over management of the Cesmin Lug and Osterode camps to the local NGO Kosovo Agency for Advocacy and Development (KAAD), funded by the Kosovo Ministry of Returns and Communities.