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ALBANIA

Reform Agenda Update -Pilot Reform Monitor

FIRST SEMESTER 2025 - AS OF JUNE 2025



Reform Agenda Update: Pilot Reform Monitor

Albania - FIRST SEMESTER 2025 - AS OF JUNE 2025

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This Reform Agenda Update: Pilot Reform Monitor is the first in the series of national monitoring reports within the Reform Monitor project.

This first Reform Agenda Update: Pilot Reform Monitor is a preliminary update intended as a mid-semester snapshot (alert!) rather than a detailed evaluation. As the project team pilots the methodological approach and the indicators, further policy developments in the coming weeks may shift the status of currently pending reforms.

The Reform Monitor tracks the implementation of selected reform steps from the Reform Agendas. The selected reform steps are organised in so-called "policy domains" that fall within the policy areas and sub-areas of the Reform Agendas. These "policy domains" are developed following an additional level of reform identification and coding of reform steps by the project team. This approach was chosen to focus on reform steps common across the WB region and to enable regional-level analyses, benchmarking and comparability, given the available human resources and the thematic expertise of the TEN network. For methodological notes and the reform steps selection process, see the draft methodology note.

This Pilot Reform Agenda Update follows a structure aligned with the Reform Monitor's methodology, covering: (1) a high-level Executive Summary; (2) procedural compliance under the RGF; (3) reform steps implementation status per policy domain; and (4) narrative and analysis of key progress and challenges. Each section provides a snapshot of progress and obstacles related to Albania's Reform Agenda implementation.

Please note that the cut-off date for data collection and assessment for this update is June 30, 2025. Developments occurring after this date are not reflected in this report but will be considered in subsequent updates.













EXECUTIVE SUMMARY

Since the launch of the Growth Plan, Albania has taken key initial steps to prepare for the implementation of the Reform Agenda under the EU's Reform and Growth Facility (RGF). Although the Agenda's design phase was marked by fragmented institutional coordination and limited stakeholder engagement, the legal and administrative framework is now largely in place. Albania has ratified both the Facility and Loan Agreements and defined the national structures responsible for coordination and reporting. It has unlocked the pre-financing tranche but has yet to submit its payment request for the first reporting period in February 2025.

Looking ahead, Albania must now move quickly to establish and operationalise the RGF Monitoring Committee and other relevant bodies, ensuring that civic actors are meaningfully included. A visibility plan has also been drafted to communicate progress and outcomes under the Growth Plan, though it has not yet been published. Overall, Albania has completed most of the foundational administrative and legal tasks necessary for managing the Facility.

While the structural setup progressed relatively smoothly, the actual implementation of reforms has been shaped by a more complex political and institutional context. Albania faced a particularly high workload, with one of the region's largest sets of reform steps scheduled for the first half of 2025, coinciding with a national parliamentary election held on 11 May 2025. The electoral period shifted political focus away from reform, undermining momentum. It also disrupted the day-to-day operations of public administration, with many officials stepping aside to run in the elections and institutional routines slowing down during the campaign season.

In this update, the Reform Monitor assessed 19 of the 34 reform steps scheduled for completion between December 2024 and June 2025. Notable progress was made in several areas, including the adoption of the new Anti-Money Laundering Strategy, steps toward improving judicial transparency, and the adoption of key legislation on renewable energy and energy efficiency. However, delays persist in several reform steps that predate the Reform Agenda itself, such as the operationalisation of the Asset Recovery Office and the new law on public-private partnerships and concessions, which remain pending.

To keep the RGF on course, stronger coordination among institutions and a renewed push from political actors will be needed to improve the pace and meet targets on time.

Key Achievements

- » Setting up the legal and administrative framework: Albania has approved the legal acts and initiated the administrative actions to set the framework for the implementation of the Growth Plan. This includes ratifying the loan and facility agreements in Parliament and defining the national strategic, coordinating, monitoring, and reporting structures. However, these structures must be operationalised without delay.
- » Approving and showing progress on strategic documents: Albania has approved the National Strategy on the Prevention of Money Laundering and the Countering of Terrorism Financing, and the Action Plan 2024–2030, through comprehensive stakeholder involvement. Regular progress reports on the implementation phase have been communicated by the Financial Intelligence Agency.
- » **Advancing Green reforms:** Notable progress has been registered on the green transition pillar. A law was passed to align with the EU Regulation on labelling, as well as to establish and operationalise a registry for the guarantees of origin for renewable energy.

Key Challenges

- » **Facing reform delays:** Several reform items have seen delays, or the institutions have back-ended them near the reporting deadline, despite work starting on them prior to the approval of the Reform Agenda. This signals stronger coordinative and administrative capacities for the implementation.
- » Lagging in reporting progress and requesting payments: Albania has not yet submitted its report on the completion of the reform steps initially scheduled for December 2024 and later extended to February 2025, nor has it submitted the accompanying payment request. As a result, the disbursement of the next tranche will be significantly delayed, given the European Commission's 90-day assessment period required to evaluate the completion of the steps before authorising the release of funds.
- Rushing important reforms: The law on public-private partnerships/concessions, scheduled for June 2025, has not been approved. Recently, the draft law was published, but it lacks a comprehensive public consultation plan, as the institutions appear to be rushing the process. Civil society actors have repeatedly advised against compromising the quality of reforms for the sake of hastiness.
- » Lacking progress in establishing ARO: The establishment of the Asset Recovery Office, a key measure in the fight against corruption and organised crime, is still pending. The law was passed in the last days of June, but remaining actions like approving required bylaws and staffing the Office are expected to fall behind schedule.

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RGF PROCESS MONITORING: LEGAL AND ADMINISTRATIVE STEPS

The RGF Process Monitoring tracks whether Albania fulfilled the necessary procedural milestones, i.e., legal and administrative steps set out under the Reform and Growth Facility (RGF) framework, to enable access to EU financial support. This part of the monitoring tracks the national government's initial and ongoing procedural compliance, using straightforward binary scoring: **Achieved** or **Not Achieved**.

Setting Up National Institutional Structures

The implementation of the RGF is coupled with several legal and administrative arrangements that lay down the applicable principles and conditions to access RGF funding through loans. Some of these steps represent foundational (obligatory) requirements that each country must complete before receiving any RGF disbursements. Achieving these indicators is essential for initiating the reform funding process.

Procedural Step	Status	Progress Details
Reform Agenda Submission to the EU	Achieved	Final Reform Agenda submitted to the European Commission on 10 October 2024.
Reform Agenda Implementing Decision	Achieved	EC implementing decision adopted on 23 October 2024.
Facility Agreement Ratification and Entry Into Force	Achieved	Parliament ratified the Facility Agreement, which entered into force on 17 March 2025.
Loan Agreement Ratification and Entry Into Force	Achieved	Parliament ratified the Facility Agreement, which entered into force on 17 March 2025.
National RA Coordinator Appointment	Achieved	With the Decision of Council of Ministers No. 252, dated 2 May 2025, the Executive Director of the State Agency of Strategic Programming and Aid Coordination (SASPAC) was appointed as coordinator of the Reform and Growth Facility.
Anti-Fraud Coordination Service	Not Achieved	The Ministry of Finance is expected to establish the Coordinat- ing Service against Fraud, but it is not yet operational.
RGF Monitoring Committee Establishment	Not Achieved	Article 7 of DCM No. 252 mandates the RGF Monitoring Com- mittee—co-led by SASPAC and the European Commission, with civil society and business members, meeting annually to assess progress—but it has yet to be established.
Technical Infrastructure for Monitoring and Reporting	Not Achieved	SASPAC will establish reporting mechanisms, with a detailed plan due within a month of DCM No. 252's approval in May.
Communication and visibility plan	Achieved	Established by SASPAC in cooperation with the European Commission and in coordination with the Media and Informa- tion Agency.

Analysis and Remarks

During the current reporting period, Albania finalised key legal steps and began establishing the administrative structures needed for the ongoing implementation of the Reform and Growth Facility (RGF) and access to EU funds. After approving the National Reform Agenda on 26 November 2024, Albania ratified the Facility and Loan Agreement, which entered into force on 17 March 2025 after parliamentary approval and presidential decree. This laid the legal groundwork for moving forward with the implementation of the RGF and carrying out the necessary administrative steps.

To keep the process running smoothly, clear rules for coordination, reporting, and accountability must be put in place. On 5 May 2025, the Council of Ministers adopted Decision No. 252, clarifying institutional responsibilities for RGF coordination and reporting in line with the Facility Agreement. It assigned the State Agency for Strategic Programming and Aid Coordination (SASPAC) as the National RGF Coordinator.

The decision also sets out other structures to be established, including the RGF Monitoring Committee. Co-chaired by SASPAC and the European Commission, the Committee will include civil society and business representatives. Meeting at least once a year, it will monitor progress, issue recommendations, and commit to upholding the principle of transparency. This Committee is expected to be established in the second half of 2025.

On the technical side, SASPAC is expected to prepare a detailed monitoring and reporting plan by early June, working with ministries and other institutions responsible for carrying out reforms. These institutions will create their own action plans, update them regularly, and submit reports twice a year to show how reforms are progressing, explain any delays, and confirm that completed reforms remain on track. To support this, the National Agency for Information Society will develop REGFIS, a digital platform to manage all data and documents related to monitoring, reporting, and auditing reform efforts.

Both the Facility Agreement and Decision No. 252 feature strict anti-fraud measures, such as robust budget controls, reporting systems for irregularities, and cooperation with EU bodies like OLAF, EPPO, EUROJUST, and the European Court of Auditors. A Coordination Service against fraud is expected to be established within the Ministry of Finance.

A communication plan is also being developed to keep the public informed, though it has not yet been released.

Overall, Albania is building a comprehensive legal and administrative framework for the implementation of the Reform Agenda. However, the timely set-up of all structures, particularly the Monitoring Committee, is critical, as this structure will play a central role in overseeing progress, identifying setbacks, and ensuring that institutions stay on track with their commitments. Equally important is the need for this committee and other coordination structures to operate with full transparency and openness. This will require, among other things, that civic actors are inclusively represented and given a genuine opportunity to contribute to the implementation of Albania's Reform Agenda.

Request(s) and Release of RGF Funds

Each beneficiary, including Albania, must sustain eligibility for disbursements throughout the RGF lifecycle, and is subject to several steps that recur semi-annually or annually. Each semester, these steps are reviewed and scored accordingly using the binary scoring: **Achieved** or **Not Achieved**.

Procedural Step	Status	Progress Details
Pre-Financing request	Achieved	Albania submitted the request for pre-financing.
Pre-Financing disbursement	Achieved	The European Commission released the pre-financing on 25 March 2025.
Semi-annual payment request submission	Not Achieved	Albania has yet to submit the payment request.
Supporting documentation for reform completion (national semi-annual reporting)	Not Achieved	Albania has yet to submit the report for the semi-annual reporting.
EC assessment on RA implementation	Not achieved	Submission of the report by national institutions is still pending.

Analysis and Remarks

During the current reporting period, Albania received its pre-financing allocation of EUR 64.5 million on 25 March 2025. This amount includes EUR 30 million in concessional loans directed to the state budget, and EUR 34.5 million in a mix of grants and concessional loans allocated to the Western Balkans Investment Framework (WBIF). In parallel, the European Commission exempted all beneficiaries, including Albania, from completing the December 2024 reform steps with a two-month extension, i.e. at the end of February 2025. Thus, delays in compiling the procedural steps are common across the region.

Albania has yet to submit the semi-annual payment requests and supporting documentation. While the Chief Negotiator's Office coordinated the initial phase of implementation, responsibility was later transferred to SASPAC following its formal designation as the National Coordinator. This handover contributed to delays in both the reform completion report for February 2025 and the corresponding request for payment.

Although these delays stem largely from the protracted process of establishing national structures and formalising communication channels with the European Commission, the remaining procedural obligations—particularly the semi-annual payment request—must be addressed promptly to prevent administrative bottlenecks in future implementation phases

REFORM AGENDA IMPLEMENTATION: STATUS OF REFORM STEPS IN FOCUS FIRST SEMESTER—2025

The table below provides an overview of the reform steps per policy domain that the Reform Monitor project tracks, with completion dates for December 2024 (extended to February 2025) and June 2025. It highlights each reform implementation status and the progress achieved. Within the selected domains, Albania has a total of eight reform steps for December 2024 and eleven reform steps for June 2025. As such, this Reform Monitor Update covers 19 of the total 34 reform steps scheduled for implementation by December 2024 and June 2025.

Reform (ID & Title)	Progress Details
Rule of Law and Fundamental Rights—Fight against Organised Crime	[1/8]
Asset Recovery Office established and operational [June 2025]	The draft law was put up for public consultation in June 2024, and was approved by Parliament on 26 June 2025. The opera- tionalization of the Asset Recovery Office is facing delays.
Rule of Law and Fundamental Rights—Fight against Money-launderin	g [1/8]
Adoption of New Strategy on Prevention of Money Laundering and Countering Terrorism Financing and its Action Plan 2024-2030 [De- cember 2024]	The Strategy and Action Plan was adopted in July 2024 by the Committee for the Coordination of the Fight against Mon- ey-laundering. Regular progress updates have been provided by the Financial Intelligence Agency to the Interinstitutional Technical Working Group.
Rule of Law and Fundamental Rights— Judiciary [5/8]	
Vetting cases with suspicion of criminal elements finalised at first instance (IQC) with termination decisions referred [December 2024]	The vetting process at first instance has concluded. The IQC has started referring to the prosecution the vetting cases with suspected criminal intent; however, there is no data on the systematic referral or the level of progress. The IQC's plan to complete the referral of cases is not published. In 2025, no referrals were registered by prosecution offices.
Effective judicial follow-up for vetting cases resulting with suspicion of criminal elements continues to be referred to prosecution [June 2025]	Some data is provided in SPAK's annual reports on investiga- tions initiated based on IQC referrals. However, there is no systematic information on the referral verification, prosecution outcomes, or regular reporting.
The High Judicial and Prosecutorial Councils ensure high transparen- cy, share publicly all the information related to appointments, (career periodic (evaluations), promotions and transfers, as well as the level of implementation of recommendations of thematic inspections by HJI [June 2025]	HJC has put in place an open data platform that displays de- cisions on appointments, transfers, and evaluations of judges and includes filters for search. While the HPC also uploads its decisions on its website, it does not divide them by the type of act (i.e. individual administrative acts), and it does not include a filtering version. Neither has published the methodology for transparency and publication of decisions. Reports on the HJI's recommendations are unavailable.
HJC effectively adopts and implements a comprehensive roadmap to increase efficiency and reduce backlog, based on the latest meth- odology as adopted by the CEPEJ backlog reduction tool-book, with measurable targets, statistics, and a robust monitoring structure. [June 2025]	The initial roadmap was prepared by a working group estab- lished by the High Judicial Council. It underwent public consul- tation in late May and is still awaiting approval.
Improve the national judicial statistics by adopting and implementing a new instruction of Minister of Justice on national justice statistics, based on CEPEJ methodology, and in consultation with the self-gov- ernment justice institutions [June 2025]	N/A

Rule of Law and Fundamental Rights – Fight against Corruption [1/8	8]
Enhance the transparency, by establishment of an open data platform on national and local budget and public spending in partnership with civil society, and publication of all asset declara- tions on the website of the High Inspectorate of Declaration and Audit of Assets and Conflicts of Interest (HIDAACI), in compliance with the law on right to information and protection of personal data [December 2024]	Asset declarations can be requested on e-albania, but are not published and freely available on HIDAACI website as stated in the Reform Agenda, limiting access due to login and ID require- ments on the e-government portal. An open data platform was launched after consulting civil society, but budget data remains only partially complete, accessible, and user-friendly.
Green Transition and Digital Transformation—Renewables [4/8]	
Adopt a quantity-based auction plan for the installation of at least 600 MW of new renewable energy capacity over the following three years. [December 2024]	N/A
Adopt law to align with 2018 Renewable Energy Directive on bio- mass/biofuels, including sustainability and greenhouse [June 2025]	The draft law was opened for public consultation in August 2024 for nearly a month. It was then submitted to Parliament with the acquis harmonisation analysis and regulatory impact assess- ment, and was approved by Parliament on 26 June 2025.
Adopt amendments to the in-force regulations for the permit issuance to simplify permit issuance procedures for renewables [June 2025].	N/A
Implement a System for Guarantees of Origin for Renewable Energy [December 2024].	As part of an Energy Community project, an electronic register for guarantees of origin was launched. In December 2024, ERE approved a new regulation on the issuance of guarantees of origin for renew- ables. ERE also joined the European Association of Issuing Bodies.
Green Transition and Digital Transformation—Energy Efficiency [3/	8]
Long-term building renovation strategy adopted, with earmarked necessary financing for 2025 and 2026 to fulfil the 3% annual reno- vation goal in existing government public buildings [December 2024].	The draft strategy, prepared with EBRD support, was open for public consultation in late December 2024 and approved by the Council of Ministers on 28 February 2025, then published on 5 March in the Official Journal. However, stakeholder involvement was limited.
Adopt the national legislation to align with Labelling [December 2024].	The draft law was opened for public consultation in November 2023 for nearly a month. It was then submitted to Parliament with the acquis harmonisation analysis and published in the Official Journal on 10 June 2024. However, stakeholder involvement was limited as the draft law received no comments.
Legal Amendments of relevant law/ June 2025; [Implement annual rate of building renovation in accordance with indicative targets [number of public buildings renovated] included into the long-term building renovation strategy] [June 2025]	The draft law was opened for public consultation in November 2024 for nearly a month, then submitted to Parliament with the acquis harmonisation analysis and regulatory impact assessment. A group of civil society organisations has issued a joint statement outlining their position on the draft. The law was passed by Parliament on 16 June 2025.
Green Transition and Digital Transformation—Digital [1/8]	
Update the list of critical infrastructure in scope of the national law in line with the NIS2 Directive [June 2025]	The government has drafted and adopted the methodology for identifying and classifying critical infrastructure. However, there are no public data available on the consultation process. The draft list has been prepared, but it is yet to be approved.
Business Environment—State-Owned Enterprises Governance [2/3]]
Amend the relevant regulations to introduce rules on the appoint- ment of board members of SOEs, subject to open and merit-based recruitment processes [June 2025]	N/A
Ensure that all new board members of SOEs are appointed through transparent and merit-based procedures [December 2024].	N/A
Business Environment—Private Sector Competitiveness [1/3]	

PROGRESS BY REFORM STEPS IN FOCUS PER POLICY DOMAINS

Policy Area I: Rule of Law and Fundamental Rights

Policy Domain—Fight against organised crime								
Deadline	Dec 24*	June 25	Dec 25	June 26	Dec 26	June 27	Dec 27	
No. of reforms	0	1	2	2	3	3	0	

Reform efforts to combat organised crime focus on two key components: strengthening asset seizure and confiscation, and intensifying the fight against corruption and high-level organised crime. The first component involves establishing and operationalising an Asset Recovery Office— a long-stand-ing initiative—integrating it into the European Network of Asset Recovery Offices, and promoting the social re-use of confiscated assets.

The second component aims to enhance the capacity of law enforcement agencies by providing the necessary tools and information to address organised crime threats. This includes conducting a threat assessment, revising the National Strategy on Organised and Serious Crimes, expanding access to and interoperability of databases, utilising IT tools in investigations, ensuring respect for due process rights, and improving the overall track record in investigations, prosecutions, final judgments, and the seizure and confiscation of assets.

During the first semester, Albania committed to establishing and operationalising the Asset Recovery Office, a long-standing initiative that remains pending.

Reform step: An Asset Recovery Office is established and operational (June 2025). As of June » 2025, the Asset Recovery Office (ARO) has not yet been established. Efforts to draft the law and set up the ARO have been ongoing for some time, tied initially to Albania's attempt to exit the FATF "grey list." An inter-institutional drafting group was formed, co-led by the Ministry of Interior and the State Police, with input from the Ministry of Justice, General Prosecution, SPAK, the Financial Intelligence Agency, and the Agency for the Administration of Seized and Confiscated Assets. The process was supported by a joint EU-Council of Europe project, which reviewed the draft law with the aim of identifying gaps and needs to ensure its alignment with EU and international standards. Two versions of the draft law were published for consultation in March and June 2024, but neither received public feedback. Parliament passed the law in a plenary session on 26 June 2025, one week after it was reviewed by the parliamentary commissions. However, other scheduled steps such as approving the bylaws, establishing the institution's structure, conducting recruitment, and signaling full operationalization are expected to face delays and will likely be postponed to the next reporting period. Overall, this reform step has seen substantial delays, even though work began several years prior.

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Policy Domain—Fight against Money-Laundering									
Deadline	Dec 24*	June 25	Dec 25	June 26	Dec 26	June 27	Dec 27		
No. of reforms	1	0	0	0	0	1	0		

Reforms to combat money laundering have centred on updating the strategic framework and ensuring effective implementation. During the first semester, Albania made progress by approving the new National Anti-Money Laundering Strategy and its 2024–2030 action plan.

Reform step: Adoption of New Strategy on Prevention of Money Laundering and Countering Terrorism Financing and its Action Plan 2024-2030 (December 2024). The new Anti-Money Laundering Strategy and Action Plan were adopted by the Committee for the Coordination of the Fight against Money Laundering through Decision No. 1, dated 24 July 2024. The strategy was developed with input from an interinstitutional technical working group, comprising public institutions as well as civil society and private sector representatives. It also benefited from expert support provided by GIZ and a joint EU-Council of Europe programme. A broad consultation process was carried out, including targeted discussions with key private sector associations such as banking, notaries, real estate, currency exchange, auditors, construction, and the bar association. The Financial Intelligence Agency has held regular meetings with the working group to share updates on implementation and discuss ongoing challenges and delays. The national risk assessment was updated in December 2023, but only a summary is publicly available due to confidentiality.

Policy Domain—Judiciary							
Deadline	Dec 24*	June 25	Dec 25	June 26	Dec 26	June 27	Dec 27
No. of reforms	1	4	1	0	2	0	3

Judicial reform efforts build on the extensive justice reform, aiming to entrench independence, accountability, and efficiency across the system. Over the years, key measures have focused on boosting transparency, reducing delays, and improving performance across all judicial levels. Current efforts aim to make reforms irreversible by finalising the vetting process, enhancing the selection of non-magistrate members for judicial and prosecutorial councils, developing a caseload management system, and improving infrastructure and staffing.

The Reform Agenda outlines two main objectives: (1) strengthening independence and accountability—by referring cases with potential criminal elements to the prosecution, amending council member selection rules, and publishing decisions on appointments, promotions, transfers, and evaluations; and (2) improving judicial efficiency—through a caseload reduction roadmap, credible progress in reducing backlogs, operationalising caseload management, addressing staff shortages, improving statistics, and securing new premises for the Appeal Court. In the first half of 2025, Albania made progress by completing the vetting process. However, referrals to the prosecution remain inconsistent. The High Judicial Council has significantly improved transparency through a user-friendly publication platform, while the High Prosecutorial Council lags behind. The Ministry of Justice has prepared strategic and operational documents to enhance efficiency, but they remain in draft form, with implementation yet to begin.

Reform step: Vetting cases with suspicion of criminal elements referred by IQC (December 2024). The first-instance vetting of all judges and prosecutors, a cornerstone of the justice reform, was concluded in November 2024 after six years of implementation. To date, 268 judges and prosecutors have been dismissed through the vetting process. An important indicator of the vetting process's success is the initiation of investigations, set to begin in 2025, into judges and prosecutors against whom potential criminal conduct was identified during the vetting proceedings. To facilitate this, the Independent Qualification Commission (IQC) was expected to develop a systematic referral plan for transmitting these cases to the prosecution offices. However, no such plan has been made public so far.

Although the IQC consistently publishes decisions related to the vetting process, it has not released any information on the status or progress of case referrals to the prosecution, making it difficult to assess this phase of the reform. While the IQC does publish statistics on vetting progress, the most recent update dates back to November 2024. For transparency purposes, data on referrals to the prosecution should be integrated into these reports.

A clear plan to complete the referral process, along with timely, comprehensive, and transparent information, which is crucial for meeting this reform step, is currently lacking. Lastly, the reform step is vaguely formulated, as it does not specify clear quantitative benchmarks or measurable criteria for evaluating its completion. This lack of clarity makes it difficult to assess progress objectively and may hinder accountability in the implementation of the reform.

Reform step: Effective judicial follow-up for vetting cases resulting in suspected criminal conduct (June 2025). This year, the Special Anti-Corruption Structure (SPAK) began including in its annual report information on the number of referrals received from the IQC, as well as the status of investigations into judges and prosecutors dismissed through the vetting process in which potential criminal conduct was identified. According to the annual report, there were 19 such referrals in 2024, down from 34 in 2023. However, the 2023 data is not publicly available from sources other than the text of the Reform Agenda. Following an initial review, SPAK determined that these cases fell outside its jurisdiction and referred them to local prosecution offices. According to data obtained through a freedom of information request, prosecution offices have launched investigations in 13 cases, are conducting preliminary assessments in three others, and have decided not to proceed in the remaining three. In 2025, no referrals have been received from the IQC.

Overall, beyond SPAK's annual statistics, public information remains limited on the functioning of the referral system, the initiation and progress of investigations, their outcomes, and any judicial follow-up. As stated in the Reform Agenda, prosecution offices are required to report quarterly on the status of received referrals. Reform step: The High Judicial and Prosecutorial Councils ensure high transparency, share publicly all the information related to appointments, career periodic (evaluations, promotions and transfers, as well as the level of implementation of recommendations of thematic inspections by HJI) (June 2025). The High Judicial Council and the High Prosecutorial Council were expected to adopt a transparency methodology to guide the publication of information on appointments, transfers, and promotions, in compliance with data protection regulations. However, no such methodology has been approved and published.

Despite this, the High Judicial Council has implemented an open data platform on its website, where it regularly publishes reports, normative acts, collective and individual administrative acts, internal regulations, instructions, and opinions. The platform features a user-friendly interface with a filtering system that allows users to search by title, decision number, issuance year, and time period. While the system is accessible and regularly updated, there is no available information on the completeness of the data—specifically, whether all decisions are published. Additionally, there are no reports on the implementation status of recommendations from thematic inspections conducted by the High Judicial Inspectorate. Between the official adoption of the Reform Agenda and May 2025, the High Judicial Council administered six promotions and eleven transfers, approved 41 ethical and professional evaluation reports, and completed evaluations for an additional 31 judges.

However, the High Judicial Council redacts the names of judges and judicial staff from individual administrative acts upon publication, based on its interpretation of Article 98 of the Law on the Governance of the Justice System. This practice also extends to decisions concerning judicial appointments, professional evaluations, promotions, and transfers. The High Judicial Council's consistent redaction of names in these decisions has drawn significant criticism. Legal scholars argue that publishing the names of judges and judicial staff involved in such decisions is both in the public interest and legally permissible under the current legal framework. According to their interpretation, transparency can be achieved without requiring amendments to existing laws, as the disclosure of such information does not inherently conflict with data protection provisions when balanced against constitutional principles.

In contrast, the High Prosecutorial Council does publish its decisions online but has not developed a comparable system for categorising information by type of act or for implementing a filtering mechanism. As a result, the level of public access to information remains lower than that provided by the High Judicial Council. The EU-funded EU4Justice project is supporting the High Prosecutorial Council in improving its public communication and transparency practices. From November 2024 to May 2025, the High Prosecutorial Council administered eleven transfers, six ethical and professional evaluations, and no promotions.

The High Prosecutorial Council has also redacted names in certain recent decisions, although the individual's name is (unintentionally) visible in the URL of the publication.

Overall, the HJC has made progress in terms of transparency, while the HPC is trailing behind. However, the methodologies remain unpublished and/or unapproved, and the reform step lacks quantitative targets to gauge its completion. The continued practice of redacting names also remains a major concern. » **Reform step: HJC adopts and implements a comprehensive roadmap to increase efficiency and reduce backlog (June 2025).** Judicial efficiency and case backlog have remained persistent challenges in Albania since the judicial reform and vetting process began. As of now, nearly 100,000 cases are pending review across four key courts, including the High Court, the Court of Appeal of General Jurisdiction, the Administrative Court of Appeal, and the Court of First Instance of General Jurisdiction of Tirana.

To address this, a national strategy for backlog reduction was introduced in May 2024, based on an assessment conducted by judicial self-governing bodies with support from international partners, including the EU and the Council of Europe. The strategy has also drawn some criticism. Attempts to increase case quotas without addressing systemic issues such as insufficient support staff and a lack of technological tools are viewed by judges as unrealistic and counterproductive, creating pressure rather than motivation.

A working group—comprising members of the High Judicial Council, judges from various levels, and EU-backed experts—was formed to develop a roadmap for improving judicial efficiency. The draft roadmap for 2025–2027 was released for consultation with non-state actors on 14 May 2025, allowing just one week for feedback. The High Judicial Council also held a consultation meeting with the chairpersons of courts in Albania. The draft roadmap is still pending approval by the HJC.

Overall, the delay in approving the roadmap is causing setbacks for this reform step, as implementation and demonstrable results are required for its completion.

» Reform step: Improve national judicial statistics by adopting and implementing a new instruction from the Minister of Justice on national justice statistics (June 2025). There is no available public data on the level of implementation of the reform step. The research team sent freedom-of-information requests, and the response is pending. The Ministry of Justice website displays only the current instructions in force.

Policy Domain—Fight against corruption								
Deadline	Dec 24*	June 25	Dec 25	June 26	Dec 26	June 27	Dec 27	
No. of reforms	1	0	0	0	1	1	0	

Anti-corruption reforms aim to decrease the incidence of corruption by increasing transparency in government actions, strengthening the legal framework of the Supreme Audit Institution, and adopting several crucial laws on donations and sponsorships, conflict of interest, and political party financing. During the first semester, Albania achieved some progress in providing transparency regarding public spending and asset declarations, although it fell short of guaranteeing adequate accessibility and data quality.

Reform step: Establishment of an open data platform on national and local budgets and » public spending, and publication of all asset declarations (December 2024). The open data platform Transparent Albania was launched in December 2024, led by the State Minister for Public Administration and Anti-Corruption (MAPA). The platform seeks to facilitate access to budget information and reinforce the right to information by offering regular updates, visual overviews of planned and actual spending, categorised by domestic and foreign funding, with sector-specific project details and implementation progress. Transparent Albania also features information on funded projects, public consultations, ministry transparency programmes, and contact details for right-to-information coordinators. After the announcement of the platform, MAPA provided a demo of the platform, organised a consultation hearing, and invited written input from civil society organisations. However, it remains unclear to what extent this input influenced the final design. While Transparent Albania represents a positive step towards transparent governance, the platform faces concerns over data usability, quality, and completeness. It lacks interactive features, detailed breakdowns, and effective filters, making it difficult to access in-depth information for research, audits, or journalism. Users cannot explore spending details, generate reports, or download data for analysis. Key spending entities like ARRSH, AKSHI, and state-owned enterprises are excluded. The platform also relies on redirects to non-user-friendly government sites, underscoring the need for better integration and cross-linking with other data sources.

The second component of this reform involves publishing all asset declarations on the website of the High Inspectorate of Declaration and Audit of Assets and Conflict of Interest (HI-DAACI). This has been a long-standing commitment, as access to declarations was previously only possible through freedom of information requests. According to the reform plan, asset declarations should be freely and easily accessible on HIDAACI's website. However, these declarations are currently only available through the e-government portal, e-Albania, which requires user identification. While this shift digitises access, it does not eliminate barriers. Users must log in using their full name, ID number, email, and phone number—information that is pre-filled and cannot be edited or removed. This raises concerns, particularly for investigative journalists who may be discouraged from requesting declarations due to fears of exposure. The use of e-Albania is justified by authorities on the grounds of data protection and cybersecurity. Although these are valid concerns, the identification requirements may be disproportionate. Therefore, a better balance should be struck between legitimate data privacy and cybersecurity concerns and ensuring equal access to information for all.

Policy Area II: Green Transition and Digital Transformation

Policy Domain—Renewable energy							
Deadline	Dec 24*	June 25	Dec 25	June 26	Dec 26	June 27	Dec 27
No. of reforms	2	2	0	1	0	2	0

Renewable energy reforms, aligned with the Green Agenda and national energy and climate strategies, aim to diversify renewable energy sources and integrate the domestic energy market with regional and EU markets. This is pursued through increased investment and expanded infrastructure to boost sector revenues, enhance competition, ensure energy security, and support environmental and climate policy goals. The Reform Agenda outlines legal measures to align with EU standards, promote market integration, and attract investment through auction schemes.

In the first half of 2025, Albania made progress by proposing a new biofuels law, currently awaiting approval, and advancing the operational setup of the electronic registry for guarantees of origin for renewable energy.

- » Reform step: Adopt a quantity-based auction plan for at least 600 MW of new renewable energy capacity installation for the following three years (December 2024). The Ministry of Infrastructure announced a 300 MW solar power auction and declared the tender winners in July 2024. However, there is no available public data on the adoption of an auction plan for 600 MW. The research team sent freedom-of-information requests, and the response is pending.
- » Reform step: Adopt a law to align with the 2018 Renewable Energy Directive on biomass and biofuels (June 2025). The draft law was published for consultation in August 2024 and remained open for nearly a month, but no comments were submitted through the public consultation platform. After the consultation phase, it was submitted to Parliament, accompanied by a regulatory impact assessment and an acquis alignment analysis with Directive 2018/2001, which is largely harmonised, according to the analysis. The law was approved by Parliament on 26 June 2025, underscoring the pattern of deferring reforms until the final stages of the reporting period.
- » Reform step: Adopt amendments to the in-force regulations for the permit issuance to simplify permit issuance procedures for renewables (June 2025). There is no publicly available data on the level of implementation of the reform steps. The research team sent freedom-of-information requests, and the response is pending.
- » Reform step: System to issue serviceable guarantees of origin for renewable energy operational (December 2024). The creation of electronic registries for guarantees of origin began with a 2022 Energy Community project aimed at promoting renewable energy adoption and enabling cross-border trading in line with EU standards. Guarantees of origin provide transparency by verifying the source of renewable energy, allowing consumers to make informed choices. Initially, Albania's Energy Regulatory Entity (ERE) established a national electronic registry with support from Grexel, the Energy Community's designated service provider. The Energy Community Secretariat stated that the registry facilitates meeting EU compliance standards.

In 2024, ERE joined the European Association of Issuing Bodies (AIB), enabling Albania to trade guarantees of origin across borders via the AIB Hub. In January 2025, ERE adopted a new regulation governing the issuance, transfer, and cancellation of guarantees of origin, recognising certificates from Energy Community contracting parties and AIB member states. This regulation advances the harmonisation of EU Directive 2018/2001 on the promotion of the use of energy from renewable sources.

Overall, the system is operational, with infrastructure in place, integration with the European network achieved, and certificates issued. On transparency, a copy of the registry is available on ERE's website, while full access is restricted to authorised users.

Policy Domain—Energy efficiency							
Deadline	Dec 24*	June 25	Dec 25	June 26	Dec 26	June 27	Dec 27
No. of reforms	2		2	0	1	2	0

Energy efficiency reforms aim to implement construction standards that reduce environmental impact and improve sustainability. The Reform Agenda outlines measures such as adopting a building renovation strategy, eco-design regulations, and aligning legal acts with the EU Energy Efficiency Directive.

During the reporting period, Albania made significant progress, completing or advancing all reform steps within the deadline. A national building renovation strategy was adopted, a law on energy labelling for products was passed, and a draft law on the energy performance of buildings is underway. These initiatives support the decarbonisation of residential, public, and commercial buildings, contribute to the goals of the Paris Agreement, and enhance consumer protection by providing clearer information on energy efficiency and consumption.

» Reform step: Long-term building renovation strategy adopted, with earmarked necessary financing for 2025 and 2026 to fulfil the 3% annual renovation goal in existing government public buildings (December 2024). In March 2023, the Energy Efficiency Agency, in cooperation with the European Bank for Reconstruction and Development, prepared the draft strategy, which was opened for public consultation from December 2024 to 15 January 2025. While no comments were submitted via the consultation platform, the strategy was later featured in civil society discussions, which commended its ambitious goals and comprehensive energy efficiency framework while urging the prompt adoption of bylaws and effective implementation.

The Council of Ministers approved the strategy on 28 February 2025, and it was published in the Official Journal on 5 March 2025. The strategy also mandates an annual renovation rate of 3% for public buildings. However, it missed both the December 2024 reporting deadline and the extended deadline to February 2025.

- » **Reform step: Adopt the national legislation to align with Labelling (December 2024).** The draft law was published for consultation in November 2023 and remained open for nearly a month, but no comments were submitted through the public consultation platform. After the consultation phase, it was submitted to Parliament, accompanied by a regulatory impact assessment and an acquis alignment analysis with Regulation 2017/1369. The law was published in the Official Journal in June 2024 and was amended in November 2024. Overall, the reform measure was completed on time.
- Reform step: Legal Amendments of relevant law/ June 2025; [Implement annual rate of building renovation in accordance with indicative targets [number of public buildings renovated] included into the long-term building renovation strategy (June 2025). The draft law was published for consultation in November 2024 and remained open for nearly a month, but no comments were submitted through the public consultation platform. However, a group of civil society organisations released a joint statement. The draft law is recognised for its alignment with the Green Agenda and EU standards, focusing on improving energy efficiency and decarbonising buildings. The statement raised concerns regarding unclear institutional responsibilities, stringent deadlines for bylaws, and inadequate financial support for vulnerable groups. It also identifies additional challenges, including the need for a comprehensive building inventory, limited capacity at the local government level, and doubts about the technical feasibility of the proposed standards.

After the consultation phase, it was submitted to Parliament, accompanied by a regulatory impact assessment. It was approved on 16 June 2025.

Policy Domain—Cyber-resilience							
Deadline	Dec 24*	June 25	Dec 25	June 26	Dec 26	June 27	Dec 27
No. of reforms	0		2	0	2	0	0

Reforms in cybersecurity focus on updating the cyber resilience framework based on the requirements of the NIS2 Directive. No public data is available to assess progress during the reporting period.

» Reform step: Update the list of critical infrastructure in scope of the national law in line with the NIS2 Directive (June 2025). Albania has made efforts to strengthen its cybersecurity framework in response to previous cyberattacks, including adopting a new cybersecurity law, which is partially aligned with the EU acquis, and a national strategy for 2025–2030. As part of its reform commitments, Albania pledged to develop and publicly consult a methodology for identifying critical infrastructure, followed by the preparation and approval of a list of critical operators by the Council of Ministers.

In November 2024, prior to the approval of the Reform Agenda itself, the government approved the methodology, which classifies digital services as "critical" or "important" based on their cyber dependency and potential societal impact. While the National Cybersecurity Authority claimed to have conducted consultations with public interest groups, no documen-

tation or evidence of these consultations has been made public, falling short of the transparency and participation requirements set by the Reform Agenda.

A draft list of critical and important operators has been compiled by the National Cybersecurity Authority and is set to be reviewed and updated every two years. However, its confidentiality, mandated by law, raises concerns that the secrecy of the process limits opportunities for meaningful consultation.

The final approval of the list by the Council of Ministers is still pending, pushing the reform measure past its June 2025 deadline and casting doubt on whether it can be considered fully implemented due to shortcomings in public consultation.

Policy Area III: Human Capital

In the Human Capital policy area, there are **no major reform steps scheduled for this semester**, **which the Reform Monitor focuses on**. In the upcoming period, the Reform Monitor will provide updates on reform progress in the policy domains of Vocational Education and Training (VET) and quality of education.

The VET reform measures aim to create a more responsive and effective system that better prepares students for the workforce. This is intended to be achieved by aligning training with industry needs, improving graduate employability, emphasising sector-specific skills, and enhancing job placement efforts. Key initiatives include establishing two sectoral skills committees in agriculture and energy, revising VET curricula in line with the S3 strategy, training VET teachers on the updated curricula, and boosting the number of graduates employed in their relevant fields.

Additionally, the measures in this policy area aim to update the curricula for primary and secondary education, with a strong emphasis on enhancing digital competences and incorporating the STEM approach. This includes training teachers to deliver the revised curricula effectively. The measures also focus on updating the national qualifications framework to align it with European standards.

Policy Domain - Human Capital								
Deadline	Dec 24*	June 25	Dec 25	June 26	Dec 26	June 27	Dec 27	
Vocational Education and Training	0	0	3	1	4	5	0	
Quality of Education	0	0	0	2	1	2	0	

Policy Area IV: Business Environment and Private Sector Development

Policy Domain—State-Owned Enterprises								
Deadline	Dec 24*	June 25	Dec 25	June 26	Dec 26	June 27	Dec 27	
No. of reforms	1	1	0	0	1	0	0	

State-owned enterprises (SOEs) have long posed challenges for Albania, particularly regarding governance, transparency, economic efficiency, and corruption risks. Reform efforts in SOE governance aim to enhance transparency and introduce merit-based criteria for appointing board members, both within the regulatory framework and in actual practice. This involves amending the legal provisions governing board appointments, guided by EU best practices, and applying them based on a performance-based classification and the strategic importance of SOEs.

According to the Reform Agenda, during this reporting period, the regulations on board member appointments were to be revised and implementation initiated. However, no public information is available on the progress made so far.

- » **Reform step: Amend relevant regulations to introduce rules on the appointment of board members of SOEs, subject to open and merit-based recruitment processes (June 2025).** There is no available public data on the level of implementation of the reform steps. The research team sent a freedom-of-information request, and the response is pending.
- » **Reform step: Ensure that all new board members of SOEs are appointed through transparent and merit-based procedures (December 2024).** There is no available public data on the level of implementation of the reform steps. The research team sent a freedom-of-information request, and the response is pending.

Policy Domain—Competition / State Aid								
Deadline	Dec 24*	June 25	Dec 25	June 26	Dec 26	June 27	Dec 27	
No. of reforms	0	1	2	0	0	0	0	

Reform efforts in competition/state aid focus on amending the highly-contested law on public–private partnerships and concessions and integrating these into the National Project Pipeline, as well as operationalising and guaranteeing the independence of the State Aid Authority. In the current reporting period, there are no results, as the PPP/concession law has not been passed.

Reform step: Adopt PPP/concession law in line with EU acquis and EU best practices (June » 2025). Public-private partnerships (PPPs) and concessions have long been a source of concern in Albania due to their misuse for corrupt practices. Consequently, the need for revision of the legal framework has been advised, both by the European Commission's yearly reports and in the screening report for cluster one. Therefore, Albania took it on as a commitment. It is reflected in various strategic documents such as the National Strategy for Public Procurement, the National Plan for European Integration, and most recently, the Reform Agenda. Plans for draft legislation on PPPs and concessions date back to 2023. In January 2023, the Prime Minister established an interinstitutional working group to review the law and draft a new law harmonised with EU Directive 2014/23. The process would be supported by SIGMA, which had conducted a legal gap analysis. Changes would address issues with unsolicited proposals, operating risk, principles of transparency and non-discrimination, and contract notices and award notices. The draft law was only put up on the public consultation platform on 9 May 2025 and will remain open until 6 June 2025, just a week before the deadline on which the responsible institution has to report to SASPAC on the completion of the measure (i.e. publication on the Official Journal and/or approval of the law by Parliament). The consultation process itself seems unsatisfactory, as no consultation events are scheduled, and considering the law's relevance to the accession process, the national EU integration structures such as the Partnership Platform or the National Council on EU integration have not been mobilised.



FOLLOW THE MONEY (SEMESTER)

During the first semester of 2025, **financial resources were monitored to ensure alignment with reform progress**. Under the EU's Reform and Growth Facility, up to **EUR 269 million**¹ is available for disbursement to Albania upon achievement of the semester's targets. Only the pre-financing amount of **EUR 64.5 million** had been **unlocked by the end of May**. The disbursement request for EUR 76.7 million for the reform steps scheduled in December 2024 is yet to be submitted. Once submitted, the European Commission will have 90 days to review it and decide on the release of funds. This will help determine the level of fund absorption for the period. Funds linked to delayed reforms will be carried over, pending their completion in future periods.

¹ Amount corresponding to the pre-financing payment and the expected disbursement for December 2024 (extended to February 2025) and June 2025.

Annex I to the Commission Implementing Decision approving the Reform Agendas and the multiannual work programme under the Reform and Growth Facility for the Western Balkans, page 66. Available at: https://enlargement.ec.europa.eu/document/download/5b511ed0-b2ba-41c3-905c-74b95ae52c37_en?filename=1.%20ANNEX%20I.pdf