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# Exploring the Progress

## Unpacking the Data



# Main Overview

## European Commission's Assessment Published on 16 October 2025

Covering two reporting periods  
December 2024 / June 2025



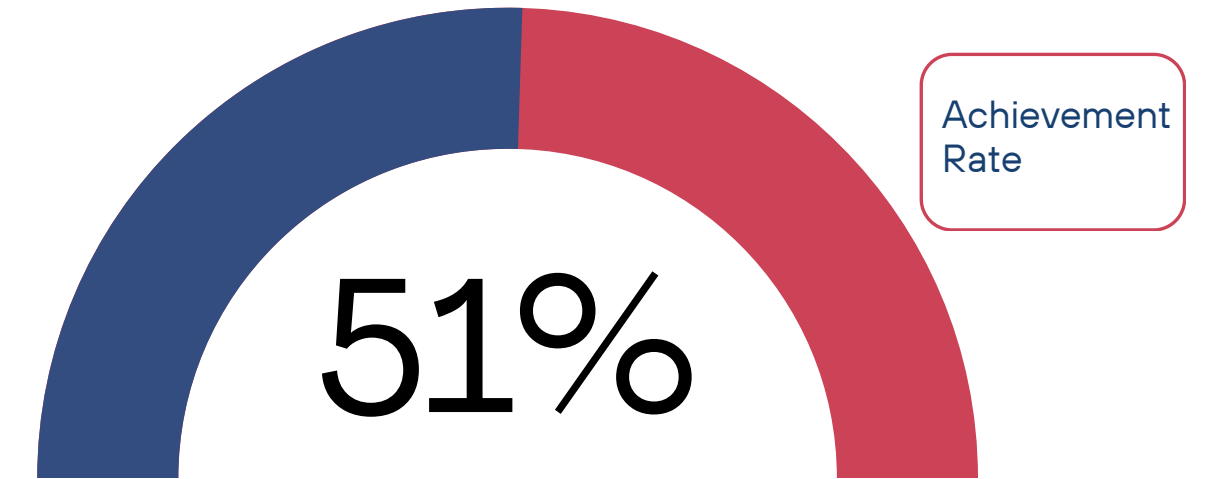
RELEASED

EXPECTED

€ 99.3 M

€ 204.5 M

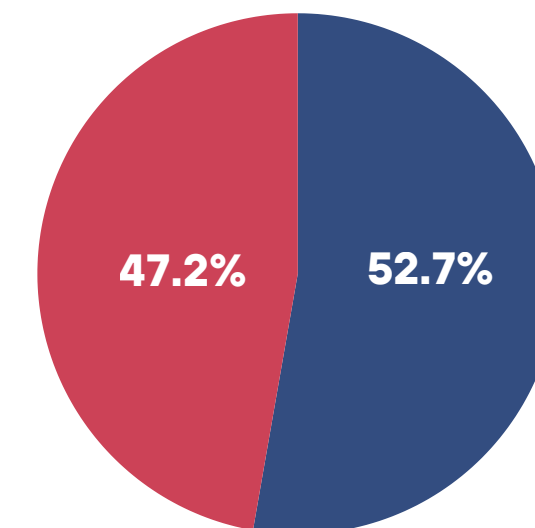
Funding  
Efficiency Rate of  
48.5%



21 out of 41 Reform  
Steps Achieved

Covered\* by IDM Monitoring

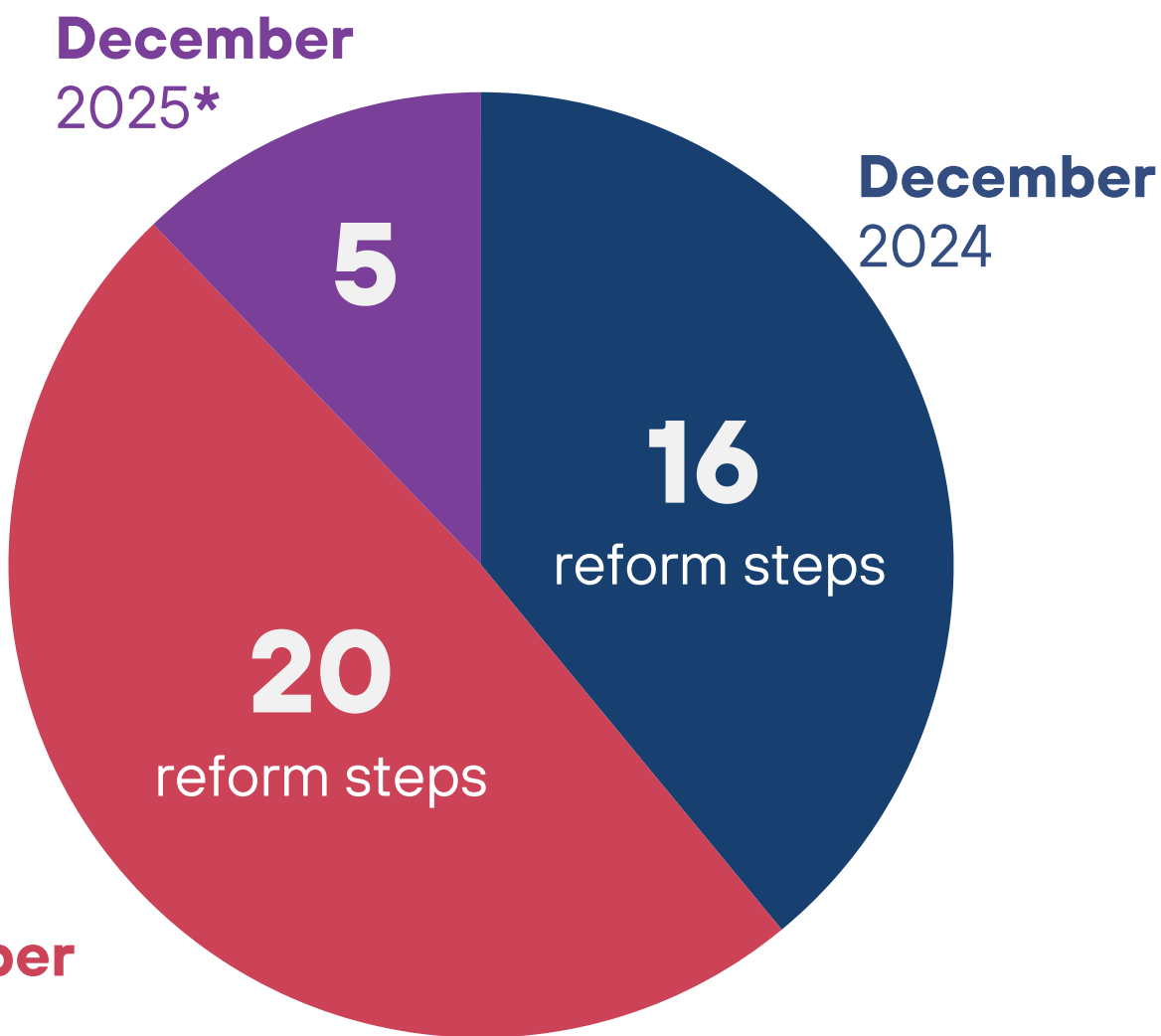
17/36  
Outside the  
Scope



19/36 Reform  
Measures  
Monitored

\*Excluding five reform steps reported ahead of schedule

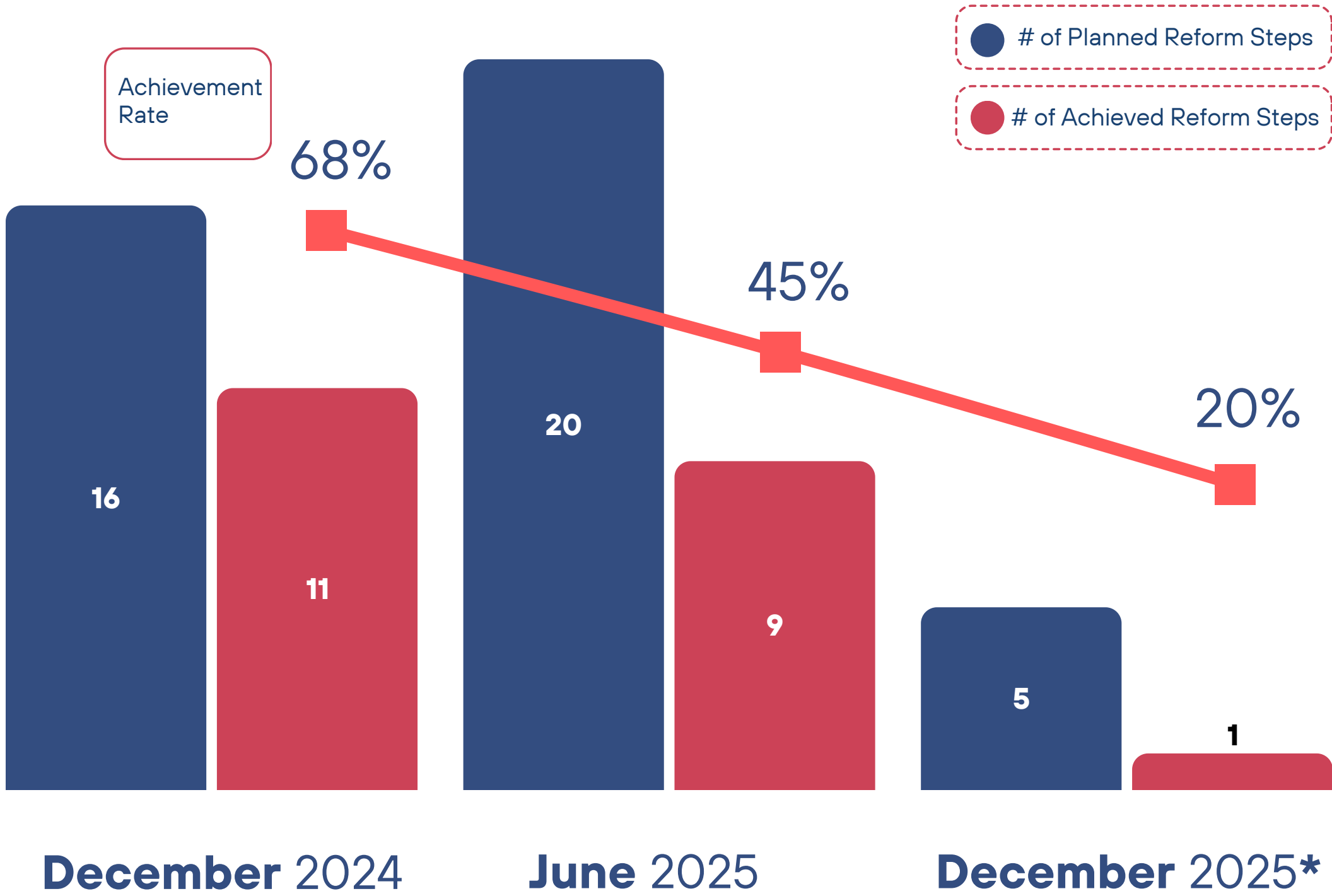
# # Reform Steps / Reporting Period



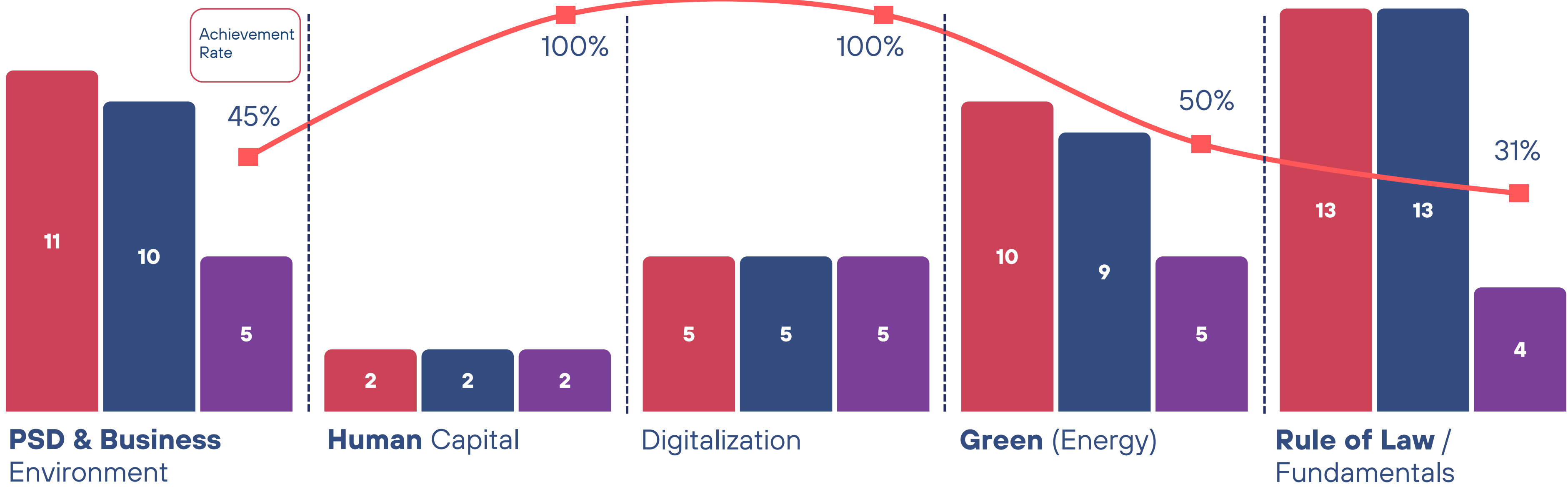
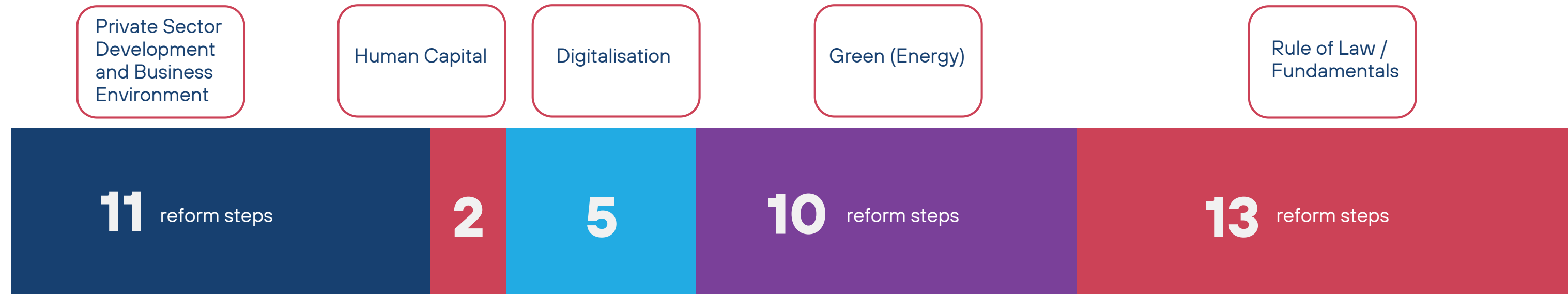
December 2025

\*December 2025 covers only five reform steps reported ahead of schedule by Albania.

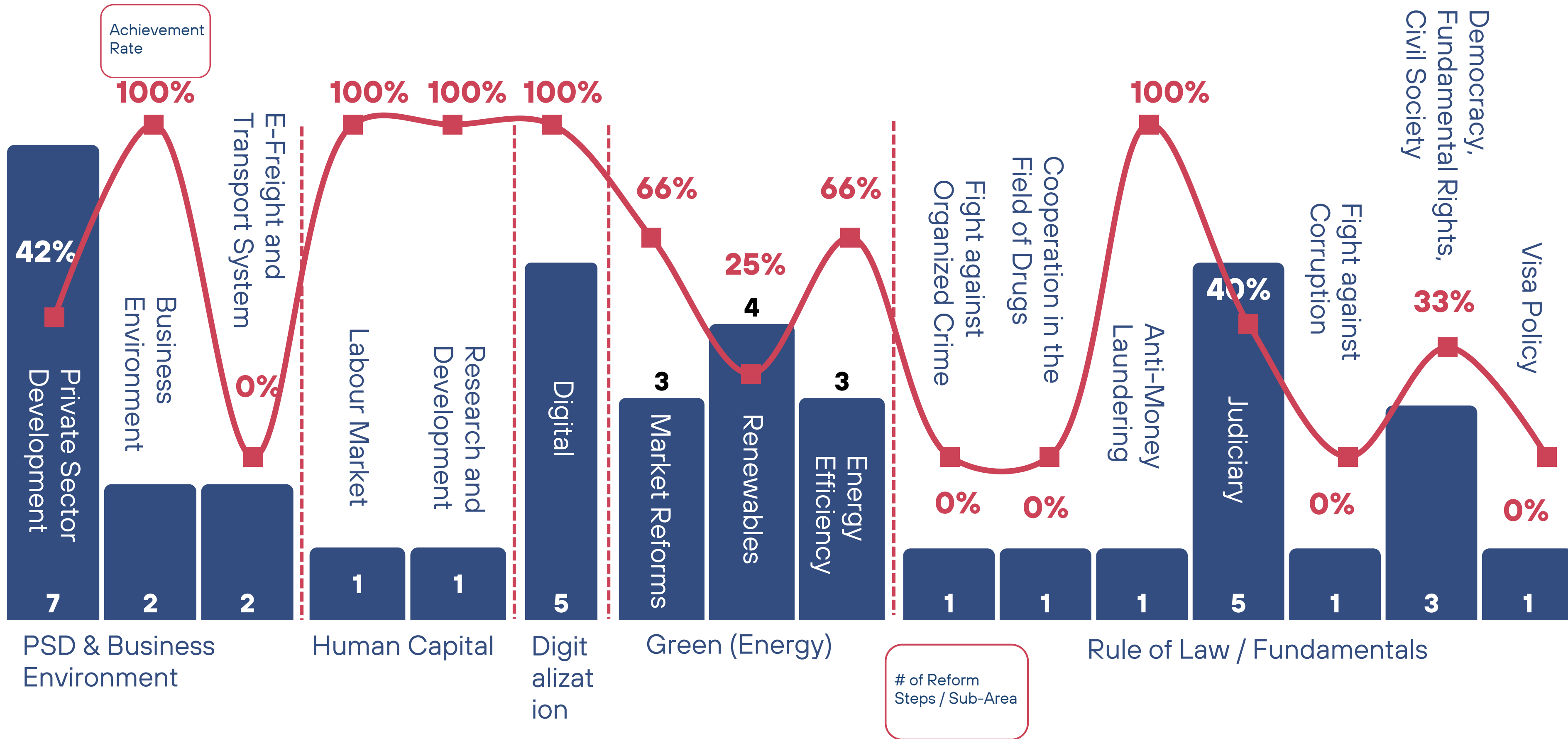
# Progress by Reporting Period



# Progress by Policy Area



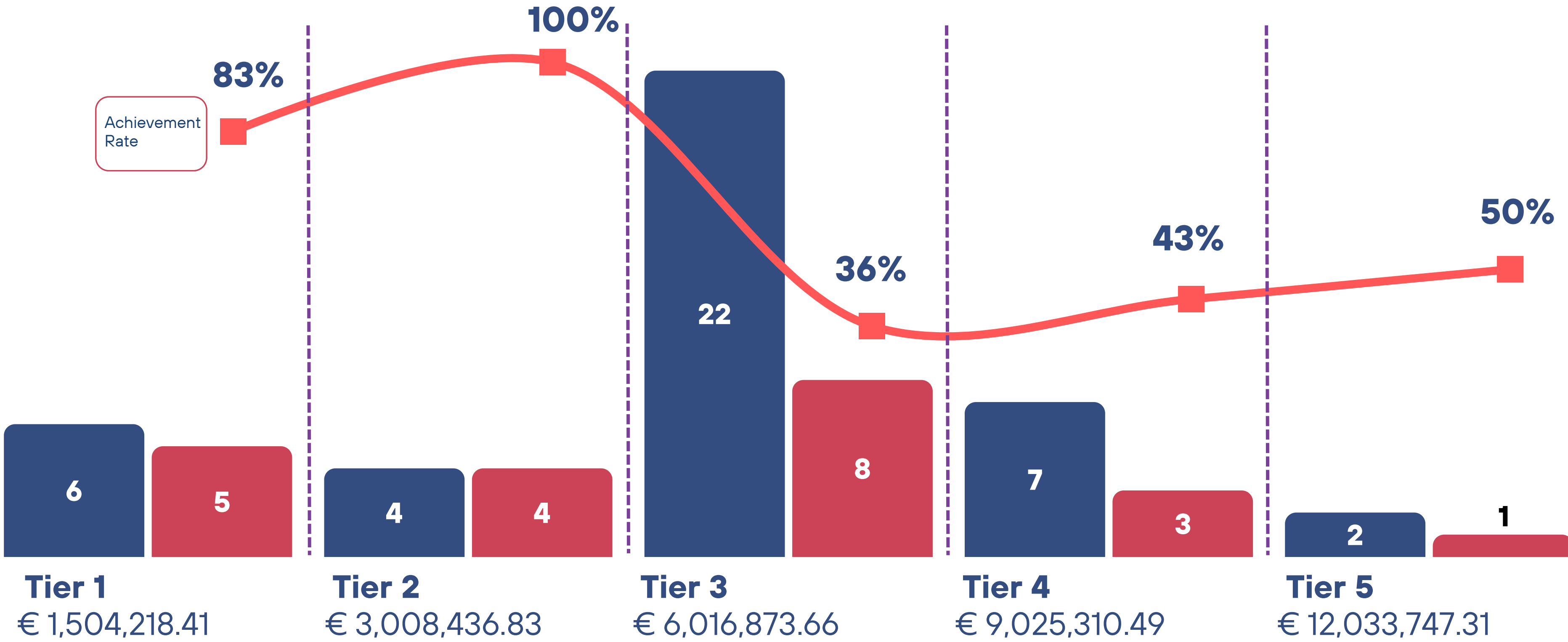
# Progress by Policy Sub-Area



# Progress by Funding Weight

**Note:** RGF funding is not linked to reform costs but to the EU Commission's five funding tiers, determined by the reform effort required. The number of steps per tier indicates the complexity of the reform workload during the reporting period.

● # of Planned Reform Steps    ● # of Achieved Reform Steps

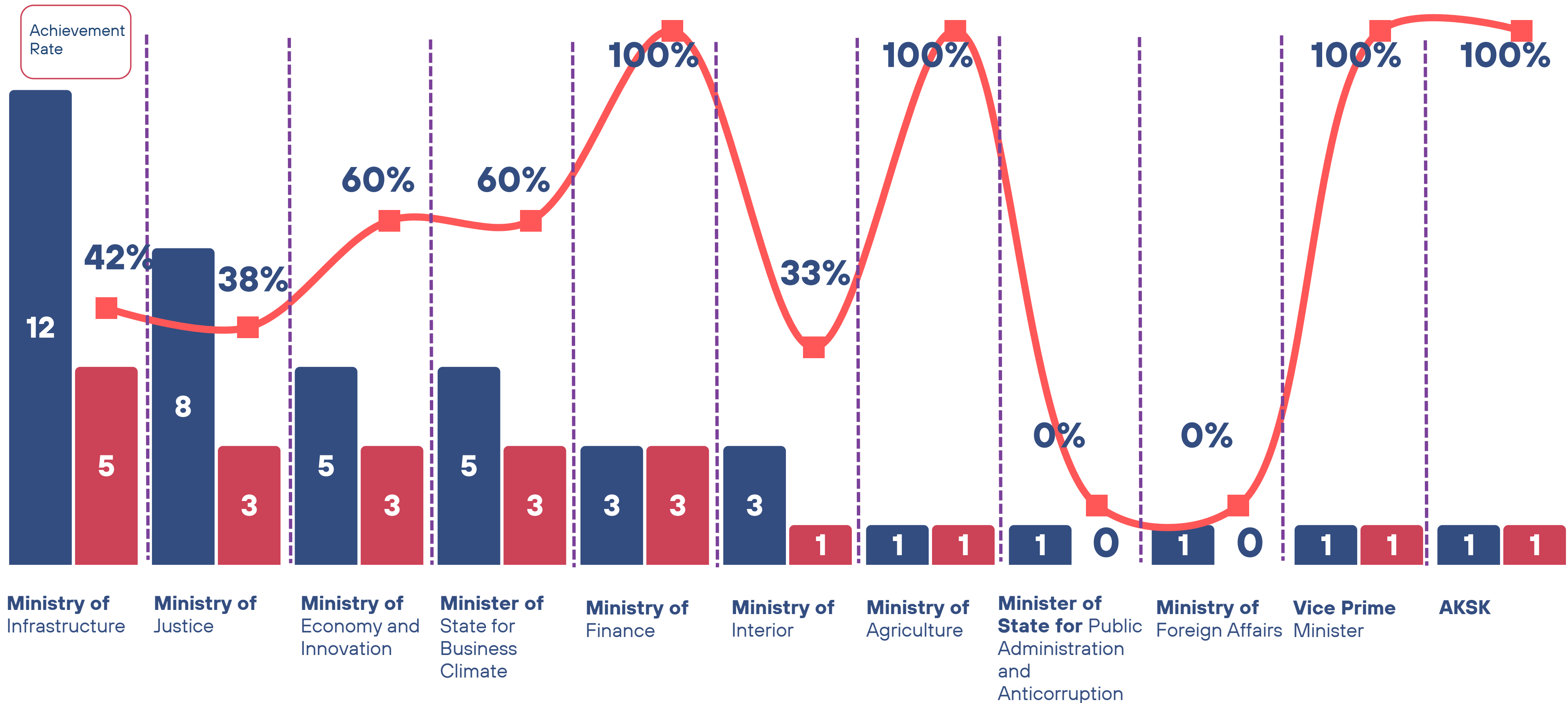


# Progress by Institutions

● # of Planned Reform Steps

● # of Achieved Reform Steps

Achievement Rate





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# Insights and main takeaways

## Understanding the Analysis





# Exposing Faults in Design

## # 1 Re-Interpretation of Reform Steps

Several reform steps have been **re-interpreted** by the responsible institutions after the start of implementation. This may create **ambiguity** regarding the specific obligations and performance indicators expected from Albania and lead to **differing interpretations** between the EU and national authorities. Such re-interpretations also complicate independent monitoring, as **shifting or unclear benchmarks** make it difficult to assess progress and verify the achievement of **agreed reform outputs and outcomes**.

## # 2 How to Score Outcome-Phrased Reform Steps?

Some reform steps are formulated as **broad outcomes** (e.g., “improve,” “increase,” etc.) but lack a **defined measurement framework** within the Reform Agenda to assess their achievement. In certain cases, such frameworks are **later developed** by the European Commission as part of its assessment process. This creates an opportunity for **civil society** to contribute by offering **guidance and support** on how to define and measure progress toward **outcome-based reform steps**.

*Example: 5.5.1 **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 declarations 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.*

# All Steps Must be Executed



## # 1 Legal Acts to be Adopted by Parliament and Published in Official Journal

### Safeguard against potential amendments in parliamentary procedure

**1.1.3** Adopt PPP/concession law in line with EU acquis and EU best practices

**1.1.5** Ratify the added Protocol to the United Nations Convention for the carriage of goods, on the “electronic consignment-note” (eCMR) for International Carriage of Goods by Road needed to deploy eFTI

## # 2 Bylaws must be in Place

**4.4.1** Adopt the national legislation to align with Labelling

**4.2.2** Adopt law to align with 2018 Renewable Energy Directive on biomass/biofuels, including sustainability and greenhouse gas emissions saving criteria for biofuels

**5.1.1** An Asset Recovery Office is established and operational - *by cutoff date*

**1.1.4** Adopt legal amendments to improve and facilitate inspection praxis for business

## # 3 Implementation Track Record and Evidence Submission

**1.1.4** Adopt legal amendments to facilitate administrative procedures for businesses - *Implementation slow, 20% of the acts included in the analysis carried out*

**5.4.2** HJC implements a roadmap to increase efficiency and reduce backlog based on the latest CEPEJ methodology, with measurable targets, statistics, and robust monitoring structure - *While vacancy projections have been made public, they do not yet incorporate full backlog reduction planning. Additionally, the working group has yet to finalise and review the HJC regulation on judicial statistics in line with the MoJ methodology. In summary, although the roadmap has been adopted, its full implementation is still pending.*

# Beyond Formal Compliance

## # 1 Reform Content assessed against Third Party Sources

The assessment shows that the EU Commission will check not just formal completion but also the **quality** of reforms, drawing also from **third-party sources** like the OECD. This offers another opportunity for national civil society actors to provide the EU with relevant **evidence and analysis**.

*Example:* 1.1.3 Amend relevant regulations to introduce rules on the appointment of board members of SOEs, subject to open and merit-based recruitment processes

*European Commission* - While the amended Decision marks progress, key gaps remain when **measured against the OECD Guidelines on SOE Governance**. It lacks clear implementation guidance and does not specify how the ministerial instructions from April 2022 and December 2024 will fit within the new framework. Risks to transparent recruitment persist, as **ministers still both propose and select board candidates**. The composition and selection process of the evaluation committee also remain undefined. Efforts to limit political influence are partial, addressing only **former political officials**.

*Example:* 5.6.1 Adopt amendments of legal framework on transparency of media ownership.

*European Commission* - It does not oblige audiovisual media to disclose ownership interests in **non-media sectors** or **other forms of influence on editorial decisions**. Moreover, AMA has made only partial progress in drafting comprehensive guidelines and defining reporting obligations for media entities. It remains **unclear** how transparency has improved in cases where **no ownership changes** have occurred. The Beneficiary should provide ... an **analysis** of how it meets **European standards** on media ownership transparency.



# Transparency

## # 1 Sources of Evidence not Public

**1.1.2** Adopt a Road Map to achieve tangible results to finalise the digitisation processes for previously paper-based cadastral ownership titles and cadastral maps by prioritising those with economic relevance and first registrations - **Order No.710 of General Director of the State Cadastre Agency approving the Roadmap not public.**

**1.1.3** Ensure that all the new board members of SOEs are appointed through transparent and merit-based procedures - **Order No. 1107, dated 16 December 2024, “On the announcement of procedures for vacant positions in the Supervisory Councils of companies in sectors of special importance” not public**

**4.2.1** Adopt a quantity-based auction plan for at least 600 MW of new renewable energy capacities installation for the following three years - **Order of the Minister of Infrastructure and Energy No. 321 of 30 December 2024 approving the quantity-based auction plan not public**

## # 2 Acts designated as internal documents

**1.1.1** Evaluation of all tax exemptions with a view to deciding whether any can be phased out, and with a view to deciding whether the use of the data sets from third parties enable unjustified wealth investigations can be possible. *The government has indicated that it considers the report to be an internal document. While the publication of the tax exemption evaluation is not explicitly required to achieve this step, the authorities are nonetheless encouraged to ensure some level of public access to the report, as this would help foster transparency and support data-driven policy dialogue on this aspect of tax policy.*

# Consultation Unchecked



## # 1 Consultation Process Often not Assessed

**Limited attention** is given in the assessment to how **stakeholders**, including civil society, are involved in reform execution.

## # 2 Consultation Reports often not Submitted as Evidence or **Quality** not Checked

**1.1.6** The laws on Animal Health and on Plant Health are adopted and are fully aligned with the EU *acquis*

**2.2.1** Adopt the S3 Strategy

**3.2.1** Adopt the Innovative Entrepreneurship Strategy

**1.1.4** Adopt legal amendments to improve and facilitate inspection praxis for business - *The Law on Inspectorates, which was adopted on 12 September 2024 and published in the Official Journal (OJ) on 13 November 2024, had not been consulted with the Commission during the drafting process.*

## # 3 Partnership Standards

Some reform measures require partnership with civil society for their completion. However, the Commission's assessments should set expectations for a higher standard of consultation, adjusted to the weight of each reform step

**Example:** **5.5.1** Enhance the transparency, by establishment of an open data platform on national and local budget and public spending **in partnership with civil society**. - *Finally, the platform was not developed "in partnership with civil society". The Beneficiary reported on a single meeting with CSOs held to discuss a concept note and allowing only written feedback. This **falls short** of the partnership requirement.*

# Others...

## # 1 Legal Certainty Jeopardised by Frequent Changes

If a reform step requires a legal act and the Commission is dissatisfied with its content, the reform is marked as unfulfilled, giving the country a one-year grace period. This may lead to frequent amendments, undermining **legal certainty** for businesses, individuals, and courts applying the law.

## # 2 Keeping an Eye, Reversibility Clause

**5.4.1** Vetting cases with suspicion of criminal elements finalised at first instance (IQC) with termination decision referred to the prosecution office.

*Pursuant to Article 21(2) and (5) of **Regulation (EU) 2024/1449**, the step is subject to the **principle of reversibility**. In line with this, the Commission will **monitor the continued implementation** of this step, such as by monitoring further developments and outcomes of ongoing investigations (including interim or final decisions), progress of the case currently on trial as well as data on newly referred cases and their prosecutorial follow-up. Should the effective judicial follow-up for vetting cases resulting with suspicion of criminal elements be **discontinued**, the Commission may **adjust subsequent disbursements by deducting the amount corresponding to this reform step**.*

## # 3 Last-Minute Saves

Several measures were acted upon on the **last day of the cutoff date** for the reporting period, adding to the concerns of **compromising quality**.

## # 4 No Partial Achievement

The Commission will not reward **partial achievement**.  
**Example** 4.4.2 Adopt amendments to the in-force regulations for the permit issuance to simplify permit issuance procedures for renewable





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# Check the Scoreboard on our website

[reform-monitor.org](https://reform-monitor.org)

