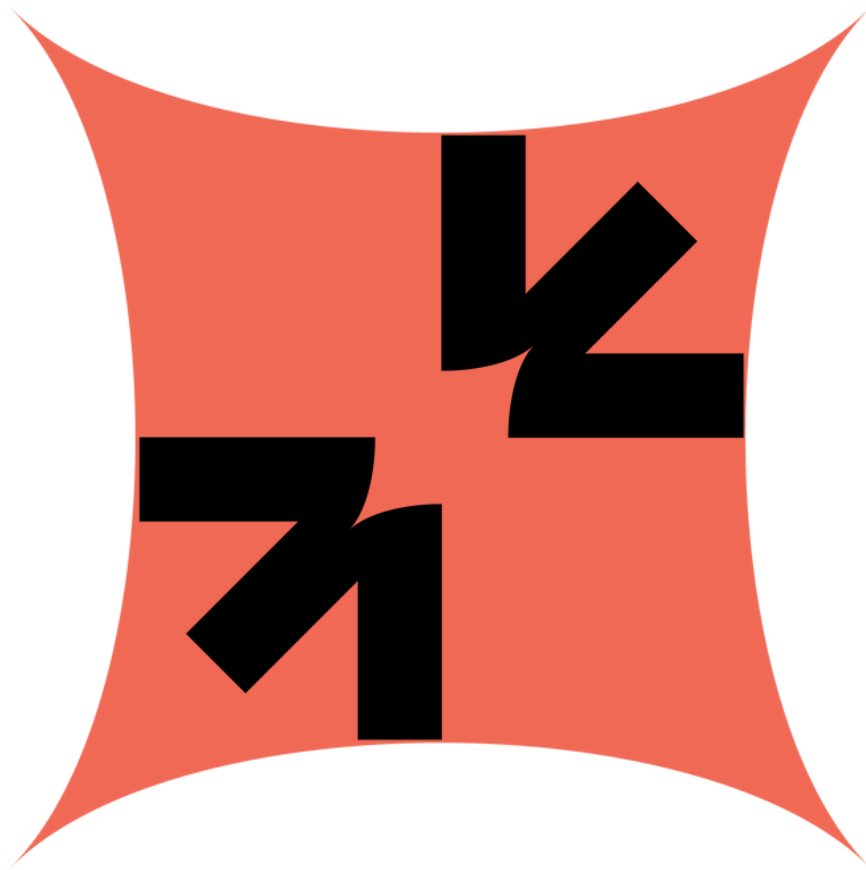


# Albania's Reform Agenda Explained: Insights on Design, Content, and Implementation

Policy Brief

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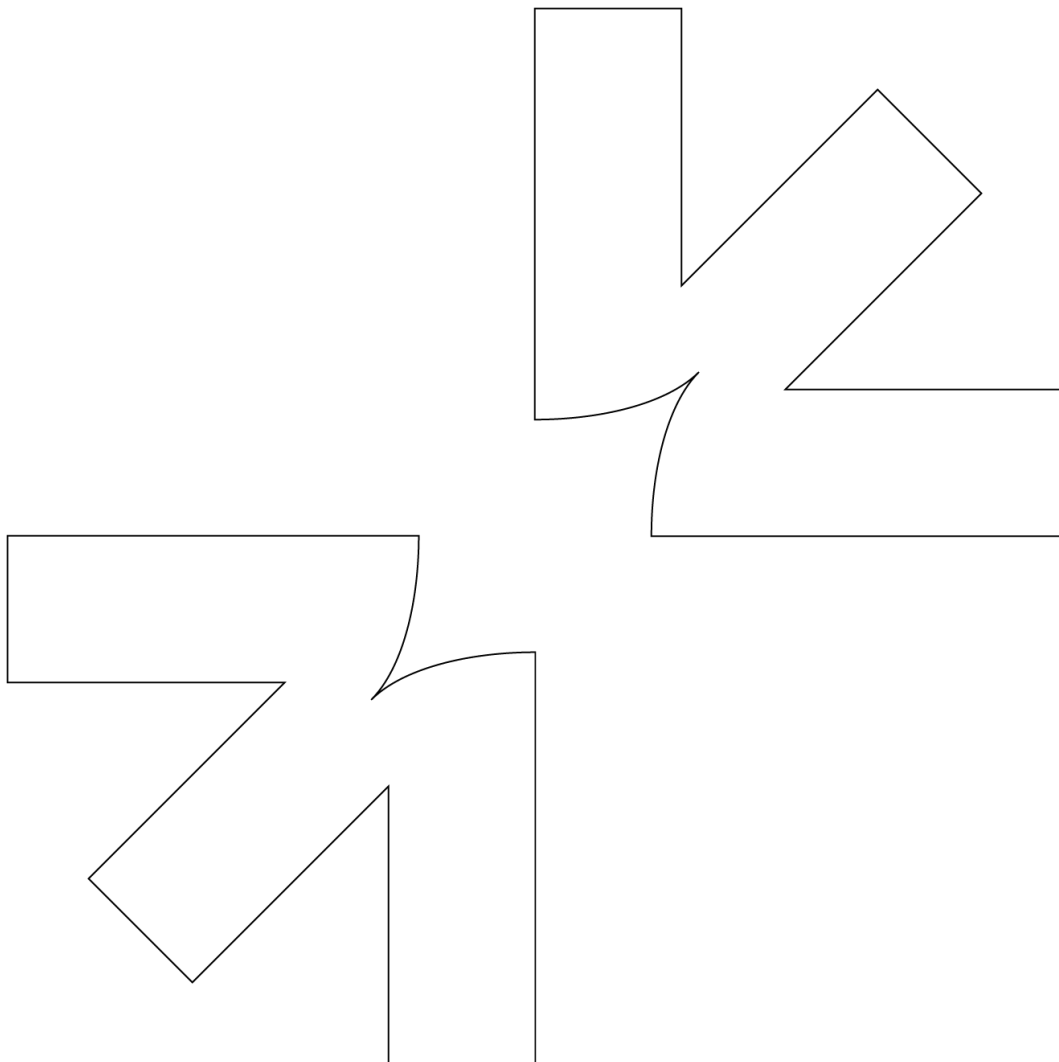




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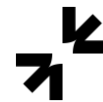
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## Introduction

Enlargement is once again gaining traction. The prospect of expanding eastward has breathed new life into efforts to revive the stalled accession process in the Western Balkans.<sup>1</sup> Seeking to usher in a new chapter of engagement, the EU is eager to demonstrate its dedication to the region. To this end, it unveiled the Growth Plan<sup>2</sup> for the Western Balkans, a strategic initiative designed to deliver some of the benefits of EU membership before formal accession.

The Growth Plan is built around four key pillars: strengthening economic integration with the EU's single market, promoting greater economic cohesion within the Western Balkans through the Common Regional Market, fast-tracking essential reforms, and enhancing financial support via a Reform and Growth Facility for the region.

It is backed by EUR 6 billion in EU financing for the 2024–2027. Half of this amount will be allocated to infrastructure investments, while the other half will be budget support, contingent on the countries' progress in implementing reforms. Disbursements from the EUR 6 billion package will be made every six months through to 2027 to those that meet the reform criteria. It brings new features, as countries can no longer block progress. If a country does not meet reform requirements, its allocated funds may be redistributed to other countries.

The region's convergence with the EU continues to be a major challenge. The average income per capita in the Western Balkans is between 27% and 50% of the EU average. Despite improved economic performance, regional growth remains too slow to achieve rapid convergence with the EU, which affects the pace of the accession process. However, if the region takes full advantage of the available opportunities, the Growth Plan provides an opportunity for faster alignment with EU living standards.<sup>3</sup>

Therefore, EU officials have lauded the Growth Plan as a game-changer, aiming to double the economic output of the Western Balkans over the next decade. Former Commissioner Varhelyi claimed that, if reforms unfold as expected, the Western Balkans should be prepared to join the EU by 2027 and that the next commission should be viewed as an enlargement commission.<sup>4</sup> Though it has its critics, analysts

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<sup>1</sup> Klaus Wölfer, *The Western Balkans: Overlooked but not unimportant*, Geopolitical Intelligence Services, December 2024, <https://www.gisreportsonline.com/r/western-balkans-not-unimportant/>

<sup>2</sup> Directorate-General for Neighbourhood and Enlargement Negotiations, *Communication New Growth Plan for the Western Balkans*, November 2023, [https://neighbourhood-enlargement.ec.europa.eu/2023-communication-new-growth-plan-western-balkans\\_en](https://neighbourhood-enlargement.ec.europa.eu/2023-communication-new-growth-plan-western-balkans_en)

<sup>3</sup> World Bank Group, *Western Balkans Regular Economic Report No. 25 – Invigorating Growth*, 2024, page 44, <https://documents1.worldbank.org/curated/en/099040524061582128/pdf/P5006481fb98fb0db1a9401e200293e761d.pdf>

<sup>4</sup> Reuters, *Leaders from Western Balkans, EU, meet to discuss growth plan, reforms*, May 2024, <https://www.reuters.com/world/europe/leaders-western-balkans-eu-meet-discuss-growth-plan-reforms-2024-05-16/>



argue that while the plan marks a positive step forward, its financial scale<sup>5</sup> and policy depth<sup>6</sup> remain somewhat constrained.

Albania has made significant strides in its EU accession journey, reaching important milestones since negotiations officially began. The First Intergovernmental Conference took place in July 2022, followed by the conclusion of the screening process and the Second Intergovernmental Conference in October 2024. Since then, it has opened Cluster 1, covering five negotiating chapters, and Cluster 6, comprising two chapters. Determined to maintain this momentum, Albania aims to complete negotiations by 2027 and achieve EU membership by 2030. The Growth Plan offers a tangible opportunity to support this ambition. Under the Growth Plan, Albania is set to receive EUR 922 million, tied to the implementation of 31 reform measures spanning five key policy areas.

To secure funding, the governments of the Western Balkan countries were required to develop Reform Agendas providing a comprehensive framework. These agendas outline a series of payment conditions tied to the planned reforms. This paper will explore the development and adoption of the Reform Agenda in Albania.

## Preparing the Reform Agenda

Albania approved the National Reform Agenda 2024–2027 via the Council of Ministers Decision No. 621 on October 10, 2024, and published it in the Official Journal on November 26.<sup>7</sup> The Reform Agenda outlines measures to improve the business climate, human capital development, energy and green transition, digital transition, and the rule of law and fundamental rights.

The European Integration Negotiation Structure, led by the Chief Negotiator, coordinated the design and drafting of the Reform Agenda with line ministries involved in their respective policy areas. Between March and June 2024, the process involved four rounds of 72 meetings, engaging line ministries, government agencies, and independent institutions. Discussions focused on drafting priority policies, consolidating reform steps, and aligning objectives with performance indicators.

While the design process is comprehensive in structure, involving multiple rounds of meetings and high-level coordination by the European Integration Negotiation

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<sup>5</sup> Marek Dabrowski, Luca Léry Moffat, *The changing dynamics of the Western Balkans on the road to European Union membership: an update*, Bruegel, July 2024, <https://www.bruegel.org/policy-brief/changing-dynamics-western-balkans-road-european-union-membership-update>

<sup>6</sup> Branimir Jovanović, *New Growth Plan for the Western Balkans: Solid Foundations, Shaky Extensions*, European Policy Institute (EPI), 2024, <https://osfwb.org/publication/new-growth-plan-for-the-western-balkans-solid-foundations-shaky-extensions/>

<sup>7</sup> Official Journal No. 198 of the Republic of Albania, 2024, <https://qbz.gov.al/eli/fz/2024/198/8f286d2d-d6cb-42c7-a920-e8dbf20b20e1>



Structure, several shortcomings have emerged upon analysis. Reporting documents from the Chief Negotiator and the Reform Agenda lack details on how ministries' inputs were integrated into the final decisions or whether their perspectives influenced priority-setting. The involvement of technical teams and agencies is noted, but there is scant evidence of the inclusion of independent expertise or critical perspectives outside the immediate government structure. This omission raises questions about the depth and inclusiveness of the design process, particularly given the complexity and scope of the Reform Agenda.

The executive bodies consulted independent institutions such as the High Judicial Council and the High Prosecutorial Council, and specialised institutions like SPAK and ILDKPKI, on the reforms included in the rule of law pillar. However, it is uncertain how much their feedback influenced the final result.

On the other hand, Parliament played a limited role in preparing the Reform Agenda, with minimal involvement throughout the process. The Government's engagement with the legislature has largely been limited to informational purposes rather than active collaboration or consultation. Parliament has been updated on the development and content of the Reform Agenda primarily through two quarterly reports presented to the Committee on European Affairs. These reports aimed to keep members informed about the process and key elements of the document. The Committee on European Affairs also held a dedicated meeting in May 2024 to discuss the Reform Agenda. This session provided an opportunity to brief Members of Parliament on the Reform Agenda's priorities and to gather their feedback and perspectives.

While these efforts facilitated some communication between the Government and Parliament, they fell short of fostering meaningful parliamentary participation in shaping the agenda. The Chairperson of the National Council on EU Integration lamented the lack of meaningful discussions on the design of the Reform Agenda and expressed concerns about the lack of access to the Reform Agenda drafts by Parliamentary structures.<sup>8</sup> Although Parliament was not directly involved in the initial stages of preparation, it will have an official role in approving the agreements related to the reform once they reach that stage.

Civil society representatives, the private sector, and other civic stakeholders were involved in the consultation process for the Reform Agenda in March 2024 through five meetings organised as part of the Partnership Platform for EU Integration, with responsible institutions for EU *acquis* chapters leading the dialogue. The draft version of the Reform Agenda was put up for consultation on the electronic register

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<sup>8</sup> European Western Balkans, *Albanian CSOs call for increased cooperation with the state in implementation of the Reform Agenda*, 2024, <https://europeanwesternbalkans.com/2024/12/24/albanian-csos-call-for-increased-cooperation-with-the-state-in-implementation-of-the-reform-agenda/>



for public notifications and consultations by the Chief Negotiator on June 14, 2024. According to the public consultation report, the document reached 1,099 individuals and received 72 comments.<sup>9</sup> The public consultation period lasted until July 12, and two weeks later, the EU secretariat coordinated a meeting with stakeholders and line ministries to discuss and review the comments. Most of the recommendations required further clarification on the proposed reforms, indicators, and estimated costs for each. The comments proposing the introduction of new reform items were largely rejected, which the Government justified by citing its limited negotiating capacity to modify the content of the Reform Agenda. Other concerns have been voiced regarding the urgency of the consultation process, which may have undermined the quality of the outcomes.<sup>10</sup>

In summary, the meaningful involvement of civil society was thought to be constrained by time limitations. This resulted in a rushed process that did not deliver quality contributions and recommendations for shaping the Reform Agenda priorities.

The Reform Agenda was drafted during an intense political confrontation. The opposition in Parliament did not engage with the Government or the parliamentary majority, so the Government largely conducted the process with minimal involvement or scrutiny from other political actors. The parliamentary opposition has not publicly expressed its stance on the Reform Agenda or the Growth Plan, further isolating the process from cross-party collaboration and oversight.

Media coverage of the Growth Plan has also been limited, focusing primarily on reporting milestones rather than offering in-depth analysis or facilitating debates among experts, policymakers, or decision-makers. This lack of critical media engagement has contributed to a lack of public discourse on the plan's implications and potential challenges. Civil society participation has similarly been subdued. While some organisations have engaged in the consultation process, there has been little public vocalisation or active involvement from broader civil society groups. The absence of meaningful dialogue from political, media, and civil society actors indicates a largely unchallenged Government-driven approach to the Growth Plan and its associated Reform Agenda.

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<sup>9</sup> Electronic Registry for Public Notices and Publications, *Policy Document "National Reform Agenda 2024-2027"*, 2024, <https://konsultimipublik.gov.al/Konsultime/Detaje/744>

<sup>10</sup> European Western Balkans, *Albanian CSOs call for increased cooperation with the state in implementation of the Reform Agenda*.



## Unpacking the Reform Agenda

The Reform Agenda seeks to unlock Albania's economic potential by driving transformation, enhancing the business climate, and promoting green and digital agendas. Its priorities include strengthening human capital, consolidating reforms, and achieving sustainable progress towards EU membership by 2030. Central to its goals is doubling economic growth through modernisation, technological innovation, and a solid rule-of-law foundation.

The Reform Agenda focuses on five key priorities: improving the business climate, promoting human capital development, driving green transition, furthering digitalization, and reinforcing the rule of law as a cornerstone for sustainable progress. It comprises 31 reforms, further divided into 143 specific steps, with funds being disbursed for their implementation. The majority of these reforms fall under the rule of law and fundamental rights policy area, encompassing 10 reform measures. Six reform measures follow this in the business climate, human capital, and energy/green transitions, while the digital transition includes four reform measures.

The allocation of funds mirrors this structure, with EUR 267 million earmarked for reforms in the rule of law and fundamentals rights policy area, EUR 209 million for the business climate, EUR 189 million for human capital, and EUR 127 million each for the digital and green transitions.

The 31 reform measures and their corresponding 143 reform steps are slated for completion between 2025 and 2027, with progress monitored through six-monthly reports. Although some measures were initially planned for completion by December 2024, their reporting period has been deferred to February 2025. The bulk of the workload is concentrated in the early years, with 66 reform steps scheduled for completion by the end of 2025. In 2026, 45 steps are planned, while the process will conclude in 2027 with the remaining 32 steps.

The **first pillar of the Reform Agenda**, focused on the business climate, includes six reform measures to boost competitiveness and economic governance. These measures involve reforming the fiscal system, strengthening property rights through transparent and digitalised cadastre services, attracting foreign investment, and improving the management of state-owned enterprises (SOEs) and state aid.

Cadastre services, long plagued by corruption and inefficiency, are set to become more transparent and effective in reinforcing property rights. Planned reforms include adopting key strategic documents, such as a national land policy, a digitalisation roadmap, and an integrity plan for the State Cadastre Agency. State





aid reforms prioritise ensuring the operational independence of the State Aid Commission, which is currently subordinate to the Ministry of Finance. Often criticised for inefficiency, politically motivated appointments, and misuse for electoral purposes, SOEs will undergo reforms to introduce transparent and merit-based procedures for board member appointments. Additionally, the law on public-private partnerships (PPPs) and concessions will be revised to align with EU standards. Key institutions responsible for coordinating and reporting on these reforms include the State Cadastre Agency, the General Directorate of Taxation, the Ministry of Transport and Infrastructure, and the Ministry of State for Entrepreneurship and Business Climate.

These issues have been highlighted repeatedly in the European Commission's annual country reports, underscoring the need for comprehensive and carefully designed reforms developed in broad consultation with non-state actors. While the proposed measures represent progress, they leave critical gaps unaddressed. For instance, strengthening the appointment process for SOE board members is a positive step, but further action is needed to enhance board independence, guarantee decision-making authority, include board members under asset declaration laws, improve financial viability, and safeguard market competition.<sup>11</sup> Similarly, concessions and PPP contracts are often cited as sources of corruption<sup>12</sup>, with limited public transparency<sup>13</sup> regarding their performance, and many of them being investigated by the special prosecution. Other concerns regarding public spending have been noted, such as the government's competence to avoid competition in international consultancy agreements of strategic interest and the volume of public procurement procedures without prior publication. Observing the scale of the issues in this policy area, the revised law, envisioned in the Reform Agenda, should include adequate transparency and monitoring requirements, such as the publication of all PPP and concession contracts in open formats and improved reporting by the Ministry of Finance and the Concessions Treatment Agency.<sup>14</sup>

The **second policy area, human capital**, is divided into three sub-areas: education, the labour market, and research and development. Education dominates this area with four reform measures, while the labour market and research and development each have one measure. According to the Reform Agenda, these reforms aim to

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<sup>11</sup> Institute for Democracy and Mediation, *National Integrity System*, 2024, page 311,

<https://idmalbania.org/publication-cpt/national-integrity-system-assessment-albania-2023/>

<sup>12</sup> Center for the Study of Democracy and Governance, *Oligarchic Tenders in Albania and the Need for the De-oligarchization process*, 2023, page 27, <https://csdgalbania.org/wp-content/uploads/2023/03/Policy-Paper-3-FINAL-ENG.pdf>

<sup>13</sup> Institute for Democracy and Mediation, *National Integrity System*, 2024, page 4.

<sup>14</sup> European Commission, *Albania 2024 Report*, 2024, page 57, [https://neighbourhood-enlargement.ec.europa.eu/document/download/a8eec3f9-b2ec-4cb1-8748-9058854dbc68\\_en?filename=Albania%20Report%202024.pdf](https://neighbourhood-enlargement.ec.europa.eu/document/download/a8eec3f9-b2ec-4cb1-8748-9058854dbc68_en?filename=Albania%20Report%202024.pdf)



enhance the education system to produce a skilled workforce that meets market demands and boosts productivity. The Ministry of Education and Sports and the Ministry of Economy, Culture, and Innovation are the main institutions responsible for implementing the reforms.

The education reforms focus on revising the vocational education and training (VET) system, updating primary and secondary school curricula, modernising the National Qualifications Framework, and equipping youth with digital literacy skills. In the labour market, the aim is to improve the efficiency of the Unemployment Policy Scheme. For research and innovation, the Reform Agenda outlines steps to strengthen Albania's innovation ecosystem. These include creating a platform to promote open science, revising the law on science and research, adopting the Smart Specialisation Strategy, and developing an action plan to improve Albania's standing on the European Innovation Scoreboard.

The education sector in Albania is deteriorating, as evidenced by the findings of the OECD's Programme for International Student Assessment (PISA), which reported a decline in all indicators compared to the 2018 results.<sup>15</sup> Local experts attribute this decline to inadequate governance of the education sector.<sup>16</sup> Additionally, there have been criticisms of the approach of linking the logic of the education system to that of the labour market, which seems to be the premise of the measures included in the Reform Agenda. Moreover, the research and innovation measures lack a depth and ambition. While updating strategies and regulatory frameworks is useful, experts have argued that a significant increase in funding and infrastructure is needed to ensure an enabling environment for research and innovation.<sup>17</sup>

The **digitalisation chapter** of the Reform Agenda is divided into two sub-areas: digital transformation, with three measures, and one measure focused on leveraging business potential to support the digital and green agenda. This makes it the pillar with the fewest reform measures overall. The reforms aim to establish a digital society with robust digital infrastructure, enhanced cyber-resilience, and easily accessible public services. Key institutions responsible for these reforms include the National Authority for Cybersecurity, the National Agency for Information Society, and the Ministry of State for Entrepreneurship and Business Environment.

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<sup>15</sup> OECD (2023), *PISA 2022 Results (Volume I): The State of Learning and Equity in Education*, PISA, OECD Publishing, Paris, <https://doi.org/10.1787/53f23881-en>.

<sup>16</sup> Vladimir Karaj, *Rënia drastike e Shqipërisë në testin PISA ngre alarmin për arsimin*, Reporter.al, 2024, <https://www.reporter.al/2024/01/09/renia-drastike-e-shqiperise-ne-testin-pisa-ngre-alarmin-per-arsimin/>

<sup>17</sup> SciDev, *Driving Research and Innovation through Mobility: Perspectives on the New Growth Plan for the Western Balkans*, 2024, page 8, <https://scidevcenter.org/wp-content/uploads/2024/08/ok-SCIDEV-Working-Paper-New-Growth-Plan-and-Research-and-Innovation.pdf>



The Reform Agenda for digital transformation outlines the Government's plans to harmonise the regulation for a European Digital Identity, launch a digital e-wallet for public services, update the cyber-resilience framework in line with the NIS2 directive, and strengthen secure 5G infrastructure. These measures build on years of Government initiatives to digitalise public services and drive the economy's digital transformation. However, progress has been hindered by major setbacks, including widespread data breaches and cyber threats that have disrupted public life.<sup>18</sup> Furthermore, there are growing concerns about the accountability of the institutions overseeing these reforms.<sup>19</sup>

The **Green Energy area** has four sub-areas and six reform measures that intend to help the country integrate with the EU market in accordance with Energy Community requirements, develop a transparent and quantitative action plan for renewable energy, and address energy efficiency and air pollution. The Ministry of Infrastructure and Energy will coordinate dependent entities, along with the Ministry of Tourism and Environment and the Ministry of Economy, Culture, and Innovation.

In addition to reforms, the Growth Plan offers opportunities to invest in green transition through EUR 1 billion in loans and EUR 2 billion in grants that the Western Balkan Investment Fund will manage, 37% of which should contribute to climate objectives.<sup>20</sup>

The **area of fundamental rights and rule of law** is divided into seven sub-areas: combating corruption and organised crime, cooperation in drug enforcement, anti-money laundering, judiciary, prevention of corruption, democracy, fundamental freedoms and civil society, and visa policy. Each sub-area includes one to two reform measures, totalling 37 reform steps. The majority of these steps focus on the judiciary (11 steps), the fight against corruption and organised crime (8 steps), and democracy and fundamental freedoms (7 steps).

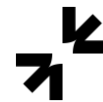
The Reform Agenda reinforces the commitment to establish an asset recovery office and combat organised crime in high-level cases in the fight against corruption and organised crime. In the field of drugs, the aim is to strengthen institutional capacity and the strategic framework for reducing illicit drug supply and demand. Regarding anti-money laundering, the Reform Agenda envisions the

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<sup>18</sup> Balkan Investigative Reporting Network, *Battle for Balkan Cybersecurity: Threats and Implications of Biometrics and Digital Identity*, 2023, <https://balkaninsight.com/2023/06/30/battle-for-balkan-cybersecurity-threats-and-implications-of-biometrics-and-digital-identity/>

<sup>19</sup> Megi Reçi, Sara Kelmendi, *Safeguarding Digital Democracy: the evolving role of non-public actors in Albania*, Geneva Centre for Security Sector Governance (DCAF), 2024, <https://www.dcaf.ch/sites/default/files/publications/documents/accountability-cybersecurity.pdf>

<sup>20</sup> Balkan Green Energy News, *EU's Growth Plan for the Western Balkans of EUR 6 billion is conditional on reforms*, November 2023, <https://balkangreenenergynews.com/eus-growth-plan-for-western-balkans-of-eur-6-billion-is-conditional-on-reforms/>



adoption of the new National Strategy on Anti-Money Laundering (recently adopted) and the implementation of the action plan stemming from the National Risk Assessment.

The vetting process for judges and prosecutors has concluded after eight years. These reforms have led to notable improvements in the system's functioning, as recognised in the recent National Integrity System Assessment, where the judiciary and prosecution saw the largest gains.<sup>21</sup> However, considerable challenges remain. A significant backlog of cases, numerous vacancies, delays in case adjudication, and limited resources continue to undermine the efficiency and quality of judicial services. Moreover, the new governing bodies of the sector should be fit to perform their duties in evaluating judges<sup>22</sup>, safeguarding transparency and accountability, and tackling lingering corruption within the sector. The measures included in the Reform Agenda aim to address several of these issues by implementing an Integrated Case Management System, filling vacancies, improving statistics, reviewing integrity standards for all members of both councils<sup>23</sup>, publishing decisions on appointment, promotion, and transfers, and prosecuting judges with criminal ties uncovered during the vetting process.

In the area of anti-corruption, the measures in the Reform Agenda are designed to reduce corruption within the public administration. These include establishing a transparency platform, reviewing the organic law of the State Audit Institution (SAI), and drafting laws on donations and sponsorships, conflicts of interest, and political party financing. These measures address critical issues, as reports indicate frequent political financing scandals and weak controls over political finance.<sup>24</sup>

On media freedom, the Reform Agenda commits to improving journalists' safety, decriminalising defamation, aligning with the Digital Services Act (DSA), increasing transparency in media ownership and financing, promoting editorial independence and pluralism, and adopting an anti-Strategic Lawsuit Against Public Participation (SLAPP) law. As noted in the EU country report, media freedom remains a critical issue, with the report flagging a lack of progress.<sup>25</sup> International organisations have raised concerns about Government actions against independent media, including the appointment of partisan figures to key roles, such as the head of the public

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<sup>21</sup> Institute for Democracy and Mediation, *National Integrity System*, 2024, page 4.

<sup>22</sup> Edmond Hoxhaj, "Mos t'i hapim rrugë mediokritetit": Debate për vlerësimin etik e professional të prokurorëve, Reporter.al, 2024, <https://www.reporter.al/2024/10/08/mos-ti-hapim-rruge-mediokritetit-debate-per-vleresimin-etik-e-profesional-te-prokuroreve/>

<sup>23</sup> Blerina Gjoka, *Zgjedhja e anëtarëve nga shoqëria civile në KLGJ dhe KLP vihet në pikëpyetje*, Reporter.al, 2024, <https://www.reporter.al/2024/06/20/zgjedhja-e-anetareve-nga-shoqeria-civile-ne-klgj-dhe-klp-vihet-ne-pikepyetje/>

<sup>24</sup> Transparency International, *Bringing the Receipts: Political Finance Transparency in the Western Balkans and Türkiye*, 2023, <https://www.transparency.org/en/publications/bringing-the-receipts-political-finance-transparency-in-the-western-balkans-and-t%C3%BCrkiye>

<sup>25</sup> European Commission, *Albania 2024 Report*, 2024, page 7.



broadcaster<sup>26</sup> and the Audiovisual Media Authority<sup>27</sup>, and the creation of a propaganda office<sup>28</sup> under the Prime Minister to manage ministerial communications. Data also shows a significant problem with SLAPPs, with 73 registered in 2023.<sup>29</sup> The measures seem positive, but the narrative part of the Reform Agenda does not seem to acknowledge the degree and severity of the documented threats against media freedom, as it qualifies incidents against journalists as “isolated”, despite reports showing that attacks against journalists and the mishandling of incidents involving journalists during protests are a recurrent issue.<sup>30</sup>

The Ministry of Justice will oversee the measures to combat corruption and organised crime, consolidate judicial independence, and enhance efficiency at all levels. In this regard, the Ministry of Health and Social Protection will cover the reforms aimed at reducing the supply and demand for illegal drugs. In contrast, the Ministry of Finance will ensure a reliable framework for preventing and combating money laundering. The Ministry of Interior will be responsible for reporting and monitoring the steps to establish an Asset Recovery Office. Regarding aligning visa requirements with European standards, the Ministry for Europe and Foreign Affairs will carry out the reporting process.

## Delivering the Reform Agenda

Publicly available information about the implementing and monitoring structures of the Reform Agenda is limited, despite the process being outlined in the document itself. According to the European Commission, the coordination and implementation of the Reform Agenda will rely on existing structures, with no plans to establish new bodies. The responsibility for overseeing the implementation of the Reform Agenda, along with its monitoring and reporting, is entrusted to the Office of the Prime Minister and the State Agency of Strategic Programming and

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<sup>26</sup> Balkan Insight, *Much-Criticised Director of Albania's Public Broadcaster Resigns*, 2024,

<https://balkaninsight.com/2024/09/06/much-criticised-director-of-albanias-public-broadcaster-resigns/>

<sup>27</sup> International Press Institute, *Albania: Concern after government ally elected to head key media regulator*, 2021,

<https://ipi.media/albania-concern-after-government-ally-elected-to-head-key-media-regulator/>

<sup>28</sup> Elona Elezi, *Albania tightens its control over the press*, Deutsche Welle, 2021, <https://www.dw.com/en/albanias-new-media-agency-a-blow-to-the-countrys-free-press/a-59340034>

Euronews Albania, *MIA, a ministry of propaganda meant to snoop on citizens, warns BIRN journalist*, 2021,

<https://euronews.al/en/mia-a-ministry-of-propaganda-meant-to-snoop-on-citizens-warns-birn-journalist/>

<sup>29</sup> SciDev, *Initial Assessment of Albania's Legal Framework for Harmonizing the Anti-SLAPP directive*, 2024, page 4,

[https://scidevcenter.org/wp-content/uploads/2024/10/Working-paper\\_Initial\\_Assessment\\_Anti\\_SLAPP\\_AL\\_SciDEV.pdf](https://scidevcenter.org/wp-content/uploads/2024/10/Working-paper_Initial_Assessment_Anti_SLAPP_AL_SciDEV.pdf)

<sup>30</sup> Freedom House, *Nations in Transit*, 2024, <https://freedomhouse.org/country/albania/nations-transit/2024>

Reporters without Borders, *Albania Country Profile*, <https://rsf.org/en/country/albania>



Aid Coordination (SASPAC).<sup>31</sup> However, the Government has yet to clearly define the implementing structures of the Growth Plan, and the loan and facility agreements are yet to be ratified by Parliament.

The Reform Agenda states that Albania's implementation of the Reform Agenda will be monitored through a continuous technical and financial oversight system. The Albanian Government will establish a permanent monitoring mechanism to produce regular progress and final reports. These reports will detail implementation progress, challenges encountered, modifications made, and the level of achievement against predefined indicators. The reports will include disaggregated data, ensuring inclusivity and attention to gender equality and empowerment. Reports will be published on the Ministry of Finance's official website.

Three key entities will oversee the implementation of the Reform Agenda. The National Coordinator will be the primary liaison with the European Commission, responsible for coordinating implementation, monitoring progress, and ensuring funds are used efficiently and transparently. The Coordinator will also oversee internal control systems, facilitate anti-fraud and anti-corruption measures, and ensure compliance with EU and OECD audit standards. It is still unknown which institution will act as the National Coordinator.

The Reform and Growth Facility Monitoring Committee plays a pivotal role in overseeing the implementation and progress of the Reform Agenda and ensuring compliance with the objectives outlined in the Reform and Growth Facility Regulation. Designed as a multi-stakeholder body, it coordinates and evaluates reforms and investments, manages risks, and ensures accountability through its oversight mechanisms. While its structure and functions are robust, the level of involvement it offers civil society warrants closer examination.

The Reform Agenda outlines the composition of the Committee, which includes representatives from civil society and stakeholders such as the European Commission, national institutions, international organisations, and private sector actors. This inclusive framework ostensibly creates a platform for civil society to participate in monitoring reforms, contribute independent oversight, and provide transparency.

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<sup>31</sup> European Commission, *Commission Implementing Decision approving the Reform Agendas and the multiannual work programme under the Reform and Growth Facility for the Western Balkans*, 2024, page 23, [https://neighbourhood-enlargement.ec.europa.eu/document/download/9f9ac397-ca8a-4bde-8204-998e27ab4f51\\_en?filename=SWD\\_2024\\_242\\_2\\_EN\\_autre\\_document\\_travail\\_service\\_part1\\_v3.pdf](https://neighbourhood-enlargement.ec.europa.eu/document/download/9f9ac397-ca8a-4bde-8204-998e27ab4f51_en?filename=SWD_2024_242_2_EN_autre_document_travail_service_part1_v3.pdf)



However, the extent to which civil society can meaningfully engage remains uncertain. The document does not elaborate on the mechanisms for selecting CSO representatives, raising questions about how their voices will be integrated into decision-making processes. Without clear criteria or transparent procedures for representation, there is a risk that civil society's involvement may be tokenistic rather than substantive. Furthermore, the limited frequency of the Committee's formal meetings—held at least once a year—may constrain opportunities for civil society to engage continuously, particularly on urgent or emerging issues. While including civil society in the Reform and Growth Facility Monitoring Committee is a positive step, its potential impact depends on operationalising this involvement. Key line ministries and institutions will act as the Reform and Growth Facility's operational arms. The ministries will prepare the required documentation, collect evidence of reform achievements, and submit semi-annual and annual reports. They will also organise technical meetings to review reform progress, address bottlenecks, and ensure cross-ministry collaboration.

## Conclusions

The Growth Plan offers a valuable opportunity for Albania to advance its preparations for EU accession, aligning well with the country's ambitions and current standing in the accession process. The Reform Agenda introduces stricter conditionality to the funding framework, drawing lessons from prior regional interventions and the EU's internal mechanisms, such as the Recovery and Resilience Facility. This demonstrates the EU's commitment to the region. The Government must seize this opportunity, but successful implementation will require concerted efforts from all stakeholders. The preparation of the Reform Agenda lacked such collaboration, underscoring the need for a different approach during implementation.

The draft version of the Reform Agenda shared for public consultation was incomplete and lacked critical information, limiting civic actors' ability to provide meaningful feedback. Furthermore, the process was rushed to meet the EU's timeline, and there was insufficient openness to integrating new elements. Nonetheless, the design of the agenda by Government institutions was comprehensive, serving as a valuable exercise for public administration despite the complexity of the task. It is worth noting that those tasked with implementing the agenda were also involved in its design, which is a positive aspect. On the other hand, given that EU integration is a national strategic priority, the Government must foster a more constructive relationship with Parliament, avoiding a pattern where executive dominance undermines meaningful parliamentary engagement.



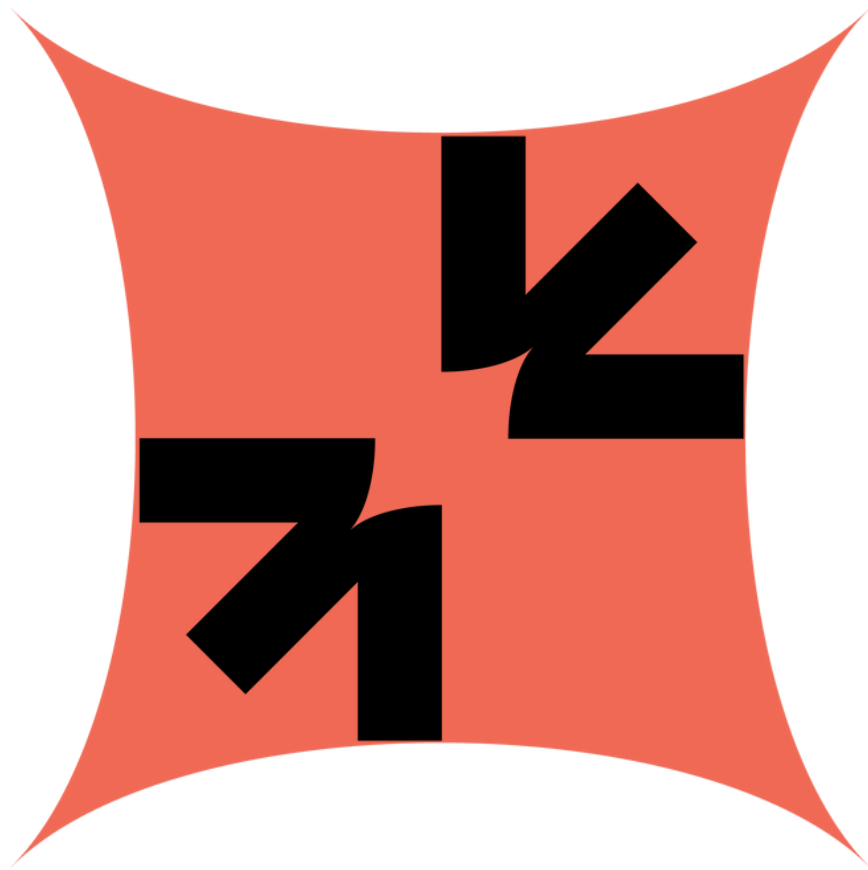
Most of the measures outlined in the Reform Agenda stem from commitments in strategic documents, such as the Rule of Law Roadmap—developed following the screening report on the first cluster—and the recently adopted National Anti-Corruption Strategy. Some measures address longstanding issues previously overlooked in Government agendas, while others fall within areas where the Government is more comfortable. Additionally, the Agenda incorporates achievements completed before its adoption.

In the end, to ensure the effective implementation of the Reform Agenda, the Government must clearly define consultation mechanisms and adopt an open and inclusive approach. Institutions should actively engage with civic actors and the final beneficiaries of each measure, allowing for alternative perspectives that can ensure the process's effectiveness and overall impact.

## Recommendations

- Clarify implementation mechanisms—The Government should define clear roles and responsibilities for implementing the Reform Agenda to allow for more transparent progress tracking.
- Establish public consultation processes—Moving forward, the Government must prioritise a more inclusive approach to implementing the Reform Agenda. This means engaging all relevant stakeholders early in the process to build broader ownership. To this end, the Government should establish a clear and transparent public consultation process, providing comprehensive documents and ample time for review.
- Engage Parliament—The Government must create a constructive relationship with Parliament, avoiding the centralisation of power that has hindered meaningful parliamentary oversight. Parliament should be fully involved in the review phases of the Reform Agenda, ensuring that parliamentary debates and scrutiny contribute to the quality and sustainability of the reforms.
- Sustain the reforms—This Government should allocate sufficient resources and political will to successfully deliver the Reform Agenda, particularly those reforms that have historically faced delays or resistance.





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