

# Independent Reporting Mechanism

Results Report:  
Albania 2023-2025

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Open  
Government  
Partnership



Independent  
Reporting  
Mechanism

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## Executive Summary

**Albania’s sixth action plan delivered moderate early results in public procurement transparency and public consultation, driven by strong political backing and oversight. Implementation was weaker across the rest of the plan. Although the action plan was co-created with a formal multi-stakeholder forum, there was limited government outreach to civil society during implementation. For future action plans, the government could extend capacity and engagement beyond the Office of the Prime Minister and reach out to a wider range of civil society and private sector groups.**

### Implementation

Albania’s 2023–2025 action plan had 24 commitments covering areas such as monitoring integrity plans, beneficial ownership transparency, access to justice, open data, public service delivery, open contracting and fiscal transparency, innovation in the defense sector, inclusivity in public services, public consultations and regulatory impact assessments, and open parliament.

The action plan achieved moderate early results in two commitments: transparency of public procurement (Commitment 15) and public consultation and regulatory impact assessments (Commitment 23). For Commitment 15, the Public Procurement Agency upgraded the e-procurement systems and strengthened monitoring of procurement, while the Public Procurement Commission fully digitalized the complaints process, giving the public easier access to contract data and appeals. For Commitment 23, the Office of the Prime Minister published regular performance reports and ensured that nearly all primary draft acts were subject to consultation on the e-consultation portal. Both commitments closely aligned with Albania’s ambition for accession to the European Union (EU) by 2030, namely EU Chapter 5 obligations to reinforce wider public administration modernization. However, transparency and accountability gaps remain. Public private partnership and concession contracts are not continuously published, while drafting specifications and evaluation of tenders remain outside the scope of current reforms.

### At a Glance

#### LEVEL OF COMPLETION

7/24	Complete or substantially complete commitments
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#### EARLY RESULTS

6/24	Commitments with early results
0/24	Commitments with significant results

#### KEY OBSERVATIONS

- EU-driven priorities delivered the clearest early results
- The pace of EU accession creates both momentum and procedural risk
- Capacity constraints in the government and civil society limited inclusiveness
- Digital platforms increased access, though their impact depends on careful design and consistent implementation
- Albania’s multi-stakeholder forum offered a more structured dialogue but not more inclusiveness

**Met the minimum requirements during implementation:** No

Additionally, public consultations remain overly formal with limited outreach and input from citizens and stakeholder groups.

Other commitments showed weaker levels of implementation or had unclear potential for results. This includes Commitment 12 on awareness and education of the public on budget transparency, the sole commitment identified as promising in the IRM Action Plan Review, which had a limited level of implementation.

### **Participation and Co-Creation**

Albania's sixth action plan was the country's first to be co-created and implemented with a formal multi-stakeholder forum, the Multi-Stakeholder Committee (MSC). During implementation, however, political leadership of the MSC shifted due to government restructuring, meetings were less frequent, and outreach was limited. Civil society engagement with the MSC was largely formal. Participation in implementation of specific commitments concentrated around well-established and capital-based CSOs and focused on central institutions that were more receptive to civil society contributions. Compared to earlier cycles, the process showed stronger structural organization through the establishment of the MSC, but this institutional improvement did not lead to broader inclusiveness in practice. Unlike the co-creation phase, during implementation Albania did not fully meet the OGP Participation and Co-Creation Standards' minimum requirements, due to the absence of MSC meetings in the second half of 2023 and the first half of 2025, as well as the lack of updates on the country's online repository (see Section III).

### **Implementation in Context**

EU accession remains the strongest driver of reforms in Albania, shaping both the pace and content of OGP commitments. The government's ambition to join the EU by 2030 has created momentum for technical upgrades, improved monitoring, and performance reporting. However, it also creates risks that fast-tracked reforms may bypass meaningful consultation. Progress in Albania's sixth OGP action plan was more visible where strong political backing and central institutions with clear mandates and external support were present. This central positioning and political attention proved decisive in driving early results, even as broader implementation challenges persisted. Institutional changes due to government restructuring prevented the MSC from meeting regularly, though technical coordination continued uninterrupted. Donor-funded CSO tools like Open Procurement Albania continued to play a critical role in the transparency of public procurement, but face sustainability risks as international funding shifts. Overall, Albania's open government journey is becoming more institutionalized, led by central bodies, and complementary to ongoing EU accession reforms, but its impact depends on extending resources and inclusiveness across all institutions and stakeholders.

## Section I. Key Observations

The key observations below offer reflections from Albania's sixth action plan cycle. These lessons aim to support Albania's future action plans and broader open government journey.

### **Observation 1: EU-driven priorities delivered the clearest early results**

Two areas with moderate early results - procurement (Commitment 15) and public consultation and regulatory impact assessments (Commitment 23) - track closely to EU accession priorities and external scrutiny. In procurement, Albania progressed on system upgrades, open data publication, and a more efficient appeals process because these tasks align with Chapter 5 obligations of the EU Accession Negotiations and donor-backed technical assistance. In public consultations, the monitoring from the Office of the Prime Minister (OPM), annual performance reporting, and portal use progressed as part of larger EU-supported public administration reforms. Lead institutions in both commitments are positioned close to the Prime Minister, either as a formal part of the Office of the Prime Minister or under its direct authority (Public Procurement Agency).<sup>1</sup> These commitments show that political attention and external incentives catalyze implementation.<sup>2</sup> However, there are also risks of prioritizing formal compliance over substantive change. For example, while nearly all acts are posted for public consultation and reports are produced, public involvement remains limited. Similarly, despite technical advancement of e-procurement, important stages of the public procurement process - such as the drafting of tender specifications and the evaluation of bids - remain outside the scope of these upgrades. Going forward, lead institutions could continue to use *EU Acquis* alignment to strengthen OGP implementation, while ensuring that EU-led reforms are embedded in the institutional systems and practices.

### **Observation 2: The pace of EU accession creates both momentum and procedural risk**

Albania's formal ambition to join the EU by 2030 is energizing reforms and concentrating political attention on compliance to meet all requirements of the *EU Acquis* (see Observation 1).<sup>3</sup> This dynamic has influenced the implementation of several OGP commitments, particularly on public consultation and regulatory impact assessment (Commitment 23), as well as public procurement and anti-corruption. Stakeholders report greater private-sector interest in structured dialogue,<sup>4</sup> and the administration is scaling up monitoring and training on stakeholders' consultation.<sup>5</sup> At the same time, accelerated timelines risk bypassing consultations or failing to conduct them in a timely and effective manner.<sup>6</sup> Experience from other countries of the Western Balkans illustrate how "time pressure" can be used to justify narrowing space for engagement of wider political and societal groups.<sup>7</sup> To safeguard OGP's participatory principles and ensure EU-driven reforms translate into lasting openness, Albania could use the next action plan to foster more dialogue among institutions at different levels of governance and ensure meaningful participation across the political spectrum, civil society, professional associations, and other societal actors in policy development. Wider political and societal buy-in could help embed open government practices beyond individual reforms or administrations, enhancing the continuity, accountability, and sustainability of progress made during the EU accession process.

### **Observation 3: Capacity constraints in the government and civil society limited inclusiveness**

Under Commitment 23, the Office of the Prime Minister strengthened its central monitoring of public consultation processes, but line ministries face uneven skills and resources to run high-quality, inclusive processes. Training for public officials is largely ad hoc, with limited budgeting for regular and larger programs.<sup>8</sup> On the non-government side, only a few donor-funded CSOs consistently engage in consultations,<sup>9</sup> as organizations outside of the capital<sup>10</sup> and most business associations<sup>11</sup> lack the capacity to prepare timely and substantive inputs. As a result, consultations skew toward well-resourced actors. In procurement oversight, the growing capacities and monitoring practices of the Public Procurement Agency (under Commitment 15) are not adequately matched by those of the implementing institutions. Additionally, civil society tools such as Open Procurement Albania face sustainability risks as donor priorities shift.<sup>12</sup> A similar dynamic appears across other commitments in the action plan. Several awareness and training-based initiatives, such as beneficial-ownership transparency (commitments 2 and 3), and asset-management training (Commitment 13), remained limited because institutions lacked capacity to deliver activities beyond isolated events. Technical commitments like the open-data readiness assessment (Commitment 6) stalled due to dependence on external capacities for implementation. In fiscal transparency and public-finance (commitments 12–14), the Public Financial Management Strategy was drafted in consultation with civil society stakeholders, but several relevant civil society-led initiatives still lacked sustained government uptake. Moving forward, Albania can unlock the full potential of its legislation and central institutions by investing in the human and financial capacities of all actors across government, civil society, and the private sector needed to implement reforms and advance open government.

#### **Observation 4: Digital platforms increased access, though their impact depends on careful design and consistent implementation**

Both the e-procurement (Commitment 15) and public consultation (Commitment 23) portals improved accessibility through real-time data, JSON formats, automatic notifications to stakeholders, and public dashboards. The upcoming Electronic Procurement System is expected to advance digital access.<sup>13</sup> The Open Data Portal (Commitment 6) provides a variety of data sets from different institutions and in different formats.<sup>14</sup> However, several design and implementation choices constrain their use. The consultation portal often lacks complete supporting documents;<sup>15</sup> procurement systems do not yet cover drafting specifications or evaluation phases;<sup>16</sup> the Concession Treatment Agency (ATRAKO)'s portal does not provide continuous access to public private partnership and concession contracts;<sup>17</sup> and the Public Procurement Commission website's accessibility features are uneven. The Open Data Portal's search functionality remains limited, reducing the platform's usability and potential for data reuse. These gaps matter because data use (by journalists, CSOs, businesses) and reuse (analysis, red-flagging, litigation) depend on completeness, exportability, and search filters, especially in light of planned integration of AI in these systems.<sup>18</sup> Albania's digital shift is progressing, but its contribution to government openness depends on thoughtful product choices (such as data depth, reliability, and machine-readability) and consistent implementation (i.e. publishing full supporting documents on the public consultation portal).

#### **Observation 5: Albania's multi-stakeholder forum offered a more structured dialogue but not more inclusiveness**

The 2023–2025 action plan was Albania’s first to be co-created and implemented through a formal multi-stakeholder forum, the Multi-Stakeholder Committee (MSC). The MSC brought long-awaited structure and clearer coordination between government and civil society. However, institutional formalization did not automatically translate into greater participation. Meetings were infrequent during the implementation period, outreach was narrow, and civil society engagement in monitoring implementation was largely formal with little substantive input. The MSC saw limited involvement of broader groups of CSOs that were important contributors in the implementation of key commitments, resulting in perceived decline in cooperation compared to earlier cycles. Government restructuring and pre-election caution disrupted continuity of MSC meetings, and irregular publication of updated information through the OGP website weakened transparency and accountability. The establishment of the MSC is a significant institutional advancement in Albania’s OGP journey, but its potential to foster meaningful co-creation and shared ownership has yet to be fully realized. Strengthening dialogue, expanding representation, and ensuring regular communication could help transform this structural progress into genuine participatory practice in the next action plan cycle.<sup>19</sup>

<sup>1</sup> The list of institutions under direct authority of the Office of the Prime Minister, <https://www.kryeministria.al/institucionet-ne-varesi/>

<sup>2</sup> Eda Noçka (Albanian Legal and Territorial Research Institute/Qendra A.L.T.R.I), interview by the IRM, 8 July 2025.

<sup>3</sup> Silvana Rusi (Cabinet of the Minister of State for Public Administration and Anti-Corruption), interview by the IRM, 28 August 2025.

<sup>4</sup> Diana Leka and Elvis Zerva (Albanian Investment Council), interview by the IRM, 3 July 2025.

<sup>5</sup> Eris Çela (Directorate for RIA and Public Consultation), interview by the IRM, 8 July 2025.

<sup>6</sup> Diana Leka and Elvis Zerva (Albanian Investment Council), interview by the IRM, 3 July 2025.

<sup>7</sup> European Western Balkans – group of authors, Enlargement without State Capture: A Call for Action for the Next European Commission, October 2024, <https://europeanwesternbalkans.com/2024/10/02/enlargement-without-state-capture-a-call-for-action-for-the-next-european-commission/>

<sup>8</sup> Eris Çela (Directorate for RIA and Public Consultation), interview by the IRM, 8 July 2025.

<sup>9</sup> Dior Angjeli (Institute for Democracy and Mediation Albania – IDM Albania), interview by the IRM, 7 July 2025.

<sup>10</sup> Partners Albania for Change and Development, Monitoring Matrix on Enabling Environment for Civil Society Development – Country Report Albania 2024, <https://www.partnersalbania.org/publication/monitoring-matrix-on-enabling-environment-for-csos-development-country-report-for-albania-2024/>

<sup>11</sup> Diana Leka and Elvis Zerva (Albanian Investment Council), interview by the IRM, 3 July 2025.

<sup>12</sup> Aranita Brahaj (Albanian Institute of Science - AIS), correspondence with the IRM, 25 July 2025.

<sup>13</sup> Klevis Agolli (National Agency for Information Society - NAIS), correspondence with the IRM, 30 July 2025.

<sup>14</sup> Open Data Albania, <https://opendata.gov.al/>

<sup>15</sup> Institute for Democracy and Mediation (IDM Albania), Public Consultation in Albania – the Illusion of Inclusion, 2024, <https://idmalbania.org/publication-cpt/monitoring-report-public-consultation-in-albania-the-illusion-of-inclusion/>

<sup>16</sup> Rovena Sulstarova (Institute for Democracy and Mediation Albania – IDM Albania), interview by the IRM, 7 July 2025.

<sup>17</sup> Klevis Agolli (National Agency for Information Society - NAIS), correspondence with the IRM, 30 July 2025; and Xhoana Ristani and Daniela Laze (Public Procurement Agency), interview by the IRM, 3 July 2025.

<sup>18</sup> Eda Noçka (Albanian Legal and Territorial Research Institute/Qendra A.L.T.R.I), interview by the IRM, 8 July 2025.

<sup>19</sup> See Section III for more.

## Section II. Early Results

This section analyzes commitments that achieved the strongest early results in the action plan. To assess early results, the IRM considers commitments' objective, the country context, the policy area, and the evidence of changes. The IRM early results assessment is determined by the depth of change that occurred and evidence that the change is expected to be sustained in time.

### Table 1. Commitments with Early Results

**Commitment 15:** Improved access to procurement information through upgrades to the electronic procurement system and the publication of open datasets.

**Commitment 23:** Enhanced transparency in policy-making through a functioning public consultation portal, publication of annual consultation reports, and wider online access to draft laws.

### Commitment 15: Increase transparency for public contracts

Implementers: Public Procurement Agency (PPA)

Supporting stakeholders: Concession Treatment Agency (ATRAKO), Public Procurement Commission, Civil society organizations: Albanian Institute of Science (AIS)

#### Context and Objectives

Public procurement in Albania accounts for a significant share of public spending, with the public procurement market representing about 10 percent of GDP in 2022,<sup>1</sup> around 7 percent in 2023,<sup>2</sup> and 16.5 percent in 2024.<sup>3</sup> Despite the introduction of e-procurement in 2009, this sector has long been vulnerable to irregularities, fictitious bidding, conflicts of interest, and ambiguous selection criteria.<sup>4</sup>

The 2023–2025 action plan committed to improving the transparency and efficiency of procurement procedures through reforms aligned with Chapter 5 (Public Procurement) of the EU acquis. Commitment 15 involved continuous publication of concessions and public-private partnership (PPP) contracts, upgrade of the online complaints system, promotion of open contracting standards, and integration of risk assessment tools, including a red flag index, as a corruption prevention tool. It also aimed to increase collaboration with civil society, notably with the Albanian Institute of Science (AIS), to promote open data standards for public contracts.

#### Early Results: Moderate Results

Evidence points to this commitment having moderate early results in opening government. Though this commitment was not identified in the Action Plan Review as “promising”, it saw substantial progress during the implementation period. Civil society stakeholders acknowledge improvements, particularly in technical capacities. However, they also highlight persistent concerns of unequal treatment and informal influence in public procurement.

The e-procurement system was enhanced through technical upgrades and improved operational methodologies. In addition, the continued publication of procurement data in open formats has made it easier for the public to track and analyze procurement processes. Under the National

Reform Agenda and led by the Minister of State for Public Administration and Anti-Corruption, the government developed the Transparent Albania platform<sup>5</sup> (beta launched in December 2024) to provide user-friendly, regularly updated open data on budget and public expenditures and to facilitate access to acts, consultations, and right-to-information requests, in partnership with civil society. It also notes complementarity with the existing open data portal, which provides more granular, machine-readable fiscal datasets and API access. The Public Procurement Agency (PPA) has gradually but consistently enhanced its internal monitoring tools to identify risk patterns and detect potential irregularities, leading to several cases being flagged for review. The electronic appeal system has also seen notable improvements, resulting in easier access, lower costs for users, and greater transparency in procurement-related complaints. However, important transparency and accountability gaps remain. The publication of new concession and PPP contracts in the electronic registry has not taken place, the complaint system still has room for improvement, and most of the new tools are yet to be developed because the new Electronic Procurement System (EPS) is still under development.

The public register of concessions and PPP contracts was established in 2019 and is managed by the Concession Treatment Agency (ATRAKO). Despite the legal obligation to publish all concession and PPP contracts, only a few contracts have been publicly accessible on the register since its inception.<sup>6</sup> One of the milestones aimed to ensure the continuous publication of all concession and PPP contracts. Early in the implementation period, the register encountered technical problems, preventing ATRAKO from publishing new contracts or amendments to existing ones.<sup>7</sup> Fixing the register was not feasible, so ATRAKO is planning a new procurement process to improve the information management system for concessions and resolve the issue of public register of concessions and PPP contracts.<sup>8</sup> In the meantime, basic information on amendments and new contracts are published on ATRAKO's website, without the possibility for upload and download of contracts and other documents. In its Country Report for Albania 2024, the EU highlighted that both ATRAKO and the Ministry of Finance need to strengthen their reporting on PPPs.<sup>9</sup> The draft law on concessions and PPPs, currently under parliamentary review, has drawn concerns from civil society<sup>10</sup> and international institutions such as the IMF,<sup>11</sup> for weakening key safeguards, reducing transparency, and enabling excessive discretion without adequate checks and balances. According to civil society, concessions and PPPs remain problematic, with insufficient public debate and limited transparency and monitoring.<sup>12</sup> The EU lists PPPs among the main business challenges in Albania.<sup>13</sup>

Another milestone was to promote Open Contracting Data Standards of the Open Contracting Partnership<sup>14</sup> through risk assessment tools, tools to control integrity of public contractors, and a Red Flag Index. The activities saw limited completion. Amendments to the Public Procurement Law in 2024 introduced legal requirements for expanding the EPS to include monitoring of contract implementation, a virtual dossier with comprehensive information on economic operators, a tender passport, and a Red Flag Risk Assessment system, as envisaged by the Anti-Corruption Strategy and the National Procurement Strategy.<sup>15</sup> A new EPS will be developed and integrate tools for risk assessment, contractor integrity, and the Red Flag Index. The National Agency for Information Society (NAIS) is leading the design of the system and its full interoperability with other systems.<sup>16</sup> With the law not setting a clear implementation timeline,<sup>17</sup> the new EPS is expected in the next one to two years.<sup>18</sup> Once functional, these tools are expected to enhance public accountability. In parallel, the PPA, in cooperation with the OSCE and the Italian Anti-Corruption Agency (ANAC), is developing indicators to measure risks across institutions, sectors, and procurement processes and may later be adapted for electronic use.<sup>19</sup> In the meantime, the PPA continues to conduct risk assessments focusing on: a) contracts with

a single bidder, which currently account for around a quarter of all procurement contracts, and b) canceled procurement processes, which also represent about a quarter of all procedures. These assessments, carried out qualitatively, have identified institutions and sectors most prone to these risks and have led to targeted monitoring plans.<sup>20</sup> The PPA is generally active in informing the public and economic operators on procurement processes,<sup>21</sup> and in cooperation with civil society, a practice less evident in other public procurement institutions.<sup>22</sup>

Nevertheless, concerns remain for the transparency of public procurement in Albania. Drafting technical specifications and evaluating offers remain outside of the scope of e-procurement automated functions, leaving space for favoritism, despite some cases where the PPA has intervened to halt suspicious specifications.<sup>23</sup> Furthermore, contract implementation monitoring and its transparency remain unsatisfactory, with monitoring reports rarely published.<sup>24</sup> The amended Public Procurement Law has introduced legal requirements to include the contract management phase in the new EPS, and NAIS is currently piloting such a module for the management of its own contracts.<sup>25</sup> Civil society has raised concerns during the drafting phase around amendments regarding the introduction of a fee for using the EPS, potentially limiting transparency in public procurement.<sup>26</sup> As the adopted provision indicates that a fee will be applied only to contracting authorities and economic operators,<sup>27</sup> civil society is also concerned its implementation might limit the participation of economic operators in procurement processes, especially smaller companies.<sup>28</sup>

As an interesting case, Open Procurement Albania is a civil society-owned database created on the model and principles of the Open Contracting Partnership (OCP). It has numerous tools such as Tender Passport, electronic announcements, complaints register, spending data by client, business register for contractors, and Red Flag Risk Assessment Instrument.<sup>29</sup> It has a consolidated audience of journalists, civil society, and private sector, as well as audit institutions and criminal investigation institutions for pre-investigative actions. While the database has been active for more than a decade, the global shift in donor-funding priorities and lack of financial support from public institutions pose a risk to the continued operation of Open Procurement Albania.<sup>30</sup>

This commitment also resulted in notable improvements to the electronic system of submitting and managing complaints in public procurement. Basic data on the procurement complaints is available in JSON format on the new website of the Public Procurement Commission (PPC) for both the register of complaints and register of decisions. An in-depth analysis conducted by the PPC reveals that the digitalization of the appeal process has reduced costs for the parties involved, and contributed to lowering carbon emissions related to this process.<sup>31</sup> The PPC also introduced a mobile app allowing all operations of the appeal process through smartphone, and an Info Point for support in the appeal process.<sup>32</sup> In 2023, the PPC received 886 complaints (compared to 782 complaints in 2022). 464 of these were fully or partially accepted by the PPC for treatment. The PPC processed 90.6 percent of complaints within the deadlines, and the average time it took to reach a decision fell further to 10 days.<sup>33</sup>

The PPC's new website has integrated several visual and audio enhancing tools that facilitate its usage by people with a disability, including adjustable color contrast, font size, and audio reading of the website.<sup>34</sup> In parallel to the real-time publication of current appeal processes, the website has a digital archive of appeal processes from the period 2010-2020. The PPC and NAIS have a working group to improve both the e-appeal system and internal systems of the PPC.<sup>35</sup>

However, there are gaps in the efficiency and accessibility of the electronic appeal system in public procurement. While the new PPC website provides JSON-format data on procurement complaints, the information is limited to general metadata and does not include the full content of submitted complaints or final decisions. Civil society considers the calculation of the fee for complaint submission as a percentage of the tender value highly problematic because it places a heavy financial burden on the complainant, often making it impossible to exercise the right to appeal, especially in high value tenders.<sup>36</sup> Though usage data collected by public institutions reveal a slight increase in the use of audio and visual enhancement tools on the PPC website, these are not functional in all sections of the website, rather limited to standard information. Also, as the digitalization of the archiving is ongoing, the list of decisions from 2010-2020 includes only general information about the decision, with no additional documents accessible to the public. Civil society representatives also point out limited search or filtering options in the Complaints Register, considering it not fully in line with transparency criteria.<sup>37</sup> These gaps limit the potential of the new system to fully support transparency, public scrutiny, and data reuse of public contracts.

Finally, Commitment 15 involved activities to increase participation of other stakeholders such as economic operators, contracting authorities, media, and the justice system through conferences, trainings, and workshops. A limited number of activities were implemented, mainly in development and publication of two manuals on complaint procedures and a follow-up online training, as well as a dedicated workshop with judges held in 2024.

The adoption of legal provisions that extend the scope and depth of the new EPS provides some level of long-term sustainability of the reform, coupled with ongoing technical upgrades to the existing system. However, its impact on government accountability and transparency is still limited due to both delayed implementation of the new system and incomplete publication of information and documents within the existing system. With continued implementation and stronger involvement of civil society and the private sector, the reforms have the potential to achieve more significant results in the next assessment cycle.

## Looking Ahead

Albania has not yet adopted the next action plan at the time of writing. As a core component of EU accession reforms, public procurement is expected to remain a top priority for the government, EU institutions, international donors, civil society, and the public. To strengthen transparency and accountability in public procurement, the Government of Albania could:

- **Raise the ambition for public procurement reforms by broadening scope, deepening transparency, and ensuring systemic integration of oversight and data systems.** Building on the positive track record and leveraging political attention on public procurement within the broader EU reform agenda, relevant institutions could consider raising the level of ambition for continued reforms so that transparency spans the full procurement cycle and all related processes. To capitalize on the momentum and anticipated political and financial support, beyond completing the new EPS, the Government of Albania could expand reforms to cover all procurement stages (including drafting of technical specifications, bid evaluation, and contract implementation) and interoperability between procurement and other relevant databases. Given the persistent challenges noted during implementation, such as the high share of single-bidder procedures and the large proportion of cancelled tenders, future reforms could analyze and address the structural causes of limited competition and frequent cancellations, as

these increase costs, delay delivery, and weaken public trust. The government could also ensure full operationalization of existing commitments on Red Flag Risk Assessment and contractor-integrity tools, and publication of full PPP and concession contracts.

- **Strengthen staff capacities alongside oversight and control mechanisms.** While ongoing technical upgrades are widely acknowledged and further improvements are anticipated with the new EPS, the government could invest in the professional development of staff and enhancing oversight structures. This would help ensure a balanced approach where technological advancements are matched by sufficient human capacities for effective implementation and sustained system performance.
- **Broaden engagement with civil society and private sector representatives.** The contributions of Albanian civil society to policy design, implementation, and independent monitoring can be more effectively integrated across relevant institutions. Beyond consultation, civil society's watchdog role could be strengthened by creating structured avenues for oversight, such as involving CSOs in monitoring high-value tenders, reviewing contract implementation, or applying tools that flag risks and irregularities. The PPA has reacted positively to civil society proposals to pilot integrity pacts in selected major procurements from 2026 onward. Relevant institutions could explore ways to systematically embed such mechanisms into procurement monitoring frameworks. This would help institutionalize meaningful participation and strengthen transparency throughout the procurement cycle.
- **Consider dedicated financial support for relevant, high-impact civil society initiatives.** Considering recent shifts in international donor priorities which have historically supported impactful tools such as the Albanian Institute of Science's Open Data Portal, the government could explore providing dedicated funding to selected civil society initiatives in this area. To preserve independence of civil society in its watchdog role, the government could also consider ensuring predictable and independently managed funding arrangements, so that civil society oversight remains credible, sustainable, and free from undue influence. This would help ensure the sector's sustainable and effective contribution to transparency and accountability in public procurement.
- **Conduct an in-depth analysis of the impact of artificial intelligence (AI) in public procurement.** Considering Albania's appointment of an AI Minister on public procurement in September 2025,<sup>38</sup> and growing plans to integrate AI across government functions, including procurement, the Government of Albania could conduct a comprehensive assessment of how AI tools may affect transparency, accountability, and data integrity in public procurement processes. As the EPS becomes interoperable with multiple databases, some of which may have varying levels of data quality, such an assessment could examine safeguards for data reliability, transparency of algorithmic decisions, and alignment with open-government and EU standards on digital governance. Safeguards could focus on ensuring human oversight in terms of rights and privacy protection and ensuring AI does not introduce biases.

**Commitment 23: Regulatory impact assessment, programming of regulatory acts and public consultation are at the foundation of a data-based, well-planned policy-making system that enables public involvement in decision-making, for a democratic, transparent and accountable governance**

Implementers: Regulatory and Compliance Department (RCD) of the Office of the Prime Minister (OPM)

Supporting stakeholders: Office of the Prime Minister (OPM), Line Ministries, OPM subordinated agencies, Civil society organizations: IDM Albania, Albanian Helsinki Committee, Investment Council, Experts: Eralda Met'hasani.

## Context and Objectives

Public consultation in Albania is regulated by Law No. 146/2014 "On Public Notification and Consultations" and supported by the online Public Register for Public Notifications and Consultations (RENjKP). While the law provides a solid framework, the process has not had a strong impact on policy-making.<sup>39</sup>

Commitment 23 aimed to strengthen public consultation and regulatory impact assessment (RIA) processes. The milestones included regular monitoring of consultation frequency and quality, improved oversight by the Office of the Prime Minister, improving planning through annual legislative programs, building institutional capacities across ministries, and empowering civil society and business associations to engage more effectively in consultations. It also focused on better RIA reporting aligned with good governance principles and increasing capacities of government officials for RIA process.

## Early Results: Moderate Results

Evidence points to moderate early results in opening government. Though this commitment was not identified in the Action Plan Review as "promising", according to institutional reporting it saw substantial progress. The public consultation process has improved with the publication of draft laws and key policy documents. However, it remains largely formalistic, with limited meaningful engagement from civil society, the private sector, and the public.

The government monitors the public consultation process through the Directorate for RIA and Public Consultation, part of the RIA and Regulatory Acts Programming Unit within the Office of the Prime Minister. Monitoring takes place weekly, with findings presented to the Heads of Legal Departments and then submitted to the Secretary General of the Prime Minister's Office for discussion at the General Secretaries' weekly meeting.<sup>40</sup> This monitoring informs semi-annual and annual-level reporting. During the action plan period, regular semi-annual reports continued to be published for the first halves of 2023, 2024, and 2025, along with Annual Performance Reports on Public Consultation for 2023 and 2024.<sup>41</sup> These reports track a range of indicators on the frequency and quality of public consultation processes.<sup>42</sup> According to the 2024 Annual Report, nearly all indicators show progress, some reaching the highest levels recorded to date: 97.5 percent of draft laws and policy documents were subject to public consultation; consultation reports were published in 100 percent of cases; and 98.7 percent of consulted acts were published on the official online consultation platform.<sup>43</sup> The same Office of the Prime Minister unit also monitors implementation of the public consultation across the central government, reviewing all 78 individual consultation reports during 2024.<sup>44</sup>

Civil society representatives acknowledge visible improvements in the initial stages of the consultation process, when considering Albania's history of closed decision-making.<sup>45</sup> They highlight specific - though still limited - cases where institutions have shown willingness and capacity to conduct high-quality public consultations. A positive development is the establishment of the European Integration Partnership Platform consultation and discussion

tables, designed to include external stakeholders in support of Albania's EU accession negotiations for each chapter.<sup>46</sup> There is also growing interest from the private sector in engaging formally with public sector representatives, reflected in the increased participation of private sector actors in recent meetings of the Albanian Investment Council.<sup>47</sup> The process of preparing the General Analytical Program of Project Acts has involved meetings with representatives of line ministries and the Office of the Prime Minister and resulted in the publication of the program for both 2024<sup>48</sup> and 2025.<sup>49</sup> These efforts are positive steps toward evidence-based, transparent, and predictable processes in legal and policy drafting in Albania.

Assessments of the quality of public consultations differ between government and external stakeholders. Government counterparts cite SIGMA-based monitoring that shows rising scores for the completeness of information and report that all consulted acts in 2024 and the first half of 2025 were accompanied by consultation reports, as well as increased involvement of external stakeholders in early stages of the drafting process, including working group.<sup>50</sup> External stakeholders, however, highlight several shortcomings and inconsistencies across institutions. Despite a strong legal framework and open entry points, public consultations remain mostly formal.<sup>51</sup> Government reports are largely quantitative, with little to no qualitative data, analysis, or reflection.<sup>52</sup> Based on its qualitative monitoring of the public consultation process, the Institute for Democracy and Mediation (IDM) highlights significant shortcomings: supporting documents are rarely published in full; consultations often occur after key decisions have been made; civil society and other stakeholders are largely excluded from early drafting stages; and the 20-working-day deadline is used even for complex documents, despite being a legal minimum. According to the IDM report, institutional feedback rarely explains whether public input was accepted or rejected, sponsoring institutions do not monitor the process, and consultations are mainly limited to the online platform, with other methods rarely used.<sup>53</sup> Even when organized, public meetings are often perceived as formal tick-the-box events rather than spaces for genuine dialogue around the policy-making process.<sup>54</sup> The Support for Improvement in Governance and Management (SIGMA) notes that a large share of approved draft laws do not originate from any policy plan (Government Annual Work Plan or sector strategy),<sup>55</sup> and civil society does not routinely consult or draw on the General Analytical Program of Project Acts to proactively plan engagement with relevant institutions on forthcoming acts.<sup>56</sup>

Civil society and business representatives point to frequent cases of informal interaction outside formal spaces of dialogue, either informal consultations initiated from civil servants or political representatives to benefit from civil society expertise through private channels,<sup>57</sup> or lobbying from the private sector.<sup>58</sup> These interactions are not systematically documented or disclosed, making it difficult to trace how they influence decision-making. Civil society has also raised concerns about cases of previously Politically Exposed Persons establishing NGOs and engaging with government institutions such as the Public Procurement Commission.<sup>59</sup> According to the EU, the monitoring and transparency of contacts with lobbyists and other third parties need to be improved, same as post-employment restrictions, to avoid conflict of interest.<sup>60</sup> Government counterparts note that these concerns are being addressed through Albania's draft Laws "On Lobbying," and "On the Prevention of Conflict of Interest in the Exercise of Public Functions", both developed in coordination with the European Commission and recently subjected to public consultation, with comments currently being incorporated into the revised draft.<sup>61</sup>

Two milestones focused on improving the quality of RIA reports and the capacities of RIA network officials and the quality control units within line ministries. During the reporting period, the RIA and Regulatory Acts Programming Unit played a central role in improving the quality of RIA reports through technical support and capacity-building. Between January and December

2024, the unit reviewed all 78 RIA reports produced by different government units and confirmed 53 of them, providing over 2,100 comments and suggestions to the line ministries, of which nearly 88 percent were reflected in the final reports. This support contributed to a significant improvement in the quality scores of RIA reports, from an average of 30 points in initial versions to 81 in final submissions. In the first five months of 2025, the unit reviewed an additional 35 RIA reports, confirming 14 and continuing its high engagement in providing targeted feedback. The average quality score of these confirmed reports improved from 41 to 86 points.<sup>62</sup> Complementing this work, the unit organized several training sessions to strengthen the capacities of RIA network officials in line ministries, on their own and in collaboration with international partners such as SIGMA and the EU for Good Governance project. Training sessions were held throughout 2024 and early 2025 reaching 20 public officials, as well as a workshop with 16 RIA coordinators in March 2025. The Albanian School of Public Administration (ASPA) has finalized a dedicated curriculum on the RIA process, which was expected to be included in ASPA's regular capacity-building program starting in September 2025.<sup>63</sup> These efforts have enhanced the technical quality of RIA reports and helped improve evidence-based policy design across government institutions.

The RIA process remains primarily focused on primary legislation, excluding other types of policy documents and secondary legislation. According to SIGMA, more draft laws are accompanied by RIAs (61 percent in 2023) and undergo public consultations (67 percent) than in 2021. However, there is room to improve the consistency in the application of these regulation tools, including by introducing RIAs of secondary legislation.<sup>64</sup> The RIA process is not directly integrated into participatory policy-making practices, and civil society representatives note that public involvement in this process is rare.<sup>65</sup> IDM's monitoring confirms that the drafting and publication of RIA reports are limited to draft laws, excluding other policy documents. Even when available, RIA reports rarely indicate how public consultation feedback has been reflected in RIAs.<sup>66</sup> The EU has called for improving the quality of RIAs and a broader interpretation of the Council of Ministers' rules of procedure regarding their application in the drafting process.<sup>67</sup> Government counterparts note that steps to address these gaps have already been initiated through the Cross-Cutting Public Administration Reform Strategy 2025–2030. This strategy includes measures to introduce a simplified preliminary RIA at early drafting stages and to extend RIA requirements to secondary legislation of high public interest.<sup>68</sup>

Commitment 23 also included two milestones on strengthening capacities across ministries to conduct meaningful consultation processes, and empowering civil society and business associations to engage effectively in these consultations. The staff of the RIA and Regulatory Acts Programming Unit are certified trainers in public consultation and provide on-demand, practical training for other civil servants - primarily newly appointed Public Consultation Coordinators - focusing on concrete, ongoing consultation processes. Due to the lack of a dedicated budget, broader trainings are held no more than once a year.<sup>69</sup>

The limited number of civil society organizations (CSOs) with capacities to contribute to formal processes, either through written consultations or direct meetings, is a key reason for the low number<sup>70</sup> and suboptimal quality<sup>71</sup> of comments submitted via the online platform. More than half of the surveyed CSOs from Partners Albania reported no participation in central-level consultations during 2024, mainly due to limited resources or lack of information on participation opportunities.<sup>72</sup> Regional CSOs face greater barriers for participation than those based in the capital, reflected in the low participation rate (only 3 percent of participating CSOs) of non-Tirana CSOs in the European Integration Partnership Platform consultation and discussion tables. Similar capacity constraints are observed in the private sector, particularly

among business representative associations.<sup>73</sup> During the reporting period, no government-led activities to support capacity building for civil society or private sector actors were reported. Training for CSOs came solely from a few organizations running their own capacity-building projects.

The existing legal framework for public consultation and regulatory impact assessment provides some long-term sustainability. Additionally, recent improvements in monitoring practices, training programs, and technical capacities are promising steps toward a culture of participatory policy-making practices. However, the impact on transparency, participation, and evidence-based decision-making remains limited. The public consultation process continues to be overly formal, with minimal engagement from civil society, business associations, and the wider public. While RIA quality has improved, public input is rarely reflected in final reports.

## Looking Ahead

Although Albania has not yet adopted a new action plan at the time of writing, public consultation is expected to remain central to OGP commitments and to EU accession. For these reforms to materialize in the next assessment cycle, broader and more consistent application of participatory practices and further investment in stakeholder capacities are needed. To consolidate and expand the progress achieved so far, the Government of Albania could:

- **Expand the scope of public consultations and RIAs.** Using its experience with primary legislation and policy documents as well as several positive practices of public consultations for secondary legislation, the government could extend this practice to a more comprehensive approach on public consultations of secondary legislation. A similar approach could be applied to RIAs, expanding their use to strategies and key pieces of secondary legislation.
- **Focus on the quality of consultations for meaningful public engagement.** Building on the strong quantitative indicators, the Office of the Prime Minister and line ministries could place greater emphasis on early-stage consultations. This could involve setting content-sensitive deadlines, strengthening feedback loops, diversifying consultation methods to ensure inclusiveness, ensuring stakeholder analysis and the accompanying stakeholder outreach takes place, and introducing standardized methodologies to improve monitoring and quality control.
- **Prioritize capacity building across institutions and stakeholders.** The government could capitalize on the strong commitment of the Office of the Prime Minister staff by investing more resources in regular and larger-scale training programs for line ministries. At the same time, the government could provide financial support to civil society initiatives that build the capacities of CSOs and private sector representatives to participate in consultations and to run stakeholder outreach and consultations themselves.
- **Safeguard trust during EU accession reforms.** With the national objective of joining the EU by 2030, Albania will face an intensive policy-making process to meet accession standards. Mitigating the risk of bypassing consultations due to accelerated timelines will be crucial to avoid setbacks in participatory policy-making, a challenge observed in other countries during pre-accession phases.

<sup>1</sup> European Commission, EU Country Report Albania 2023, [https://enlargement.ec.europa.eu/system/files/2023-11/SWD\\_2023\\_690%20Albania%20report.pdf](https://enlargement.ec.europa.eu/system/files/2023-11/SWD_2023_690%20Albania%20report.pdf)

<sup>2</sup> European Commission, EU Country Report Albania 2024, [https://enlargement.ec.europa.eu/document/download/a8eec3f9-b2ec-4cb1-8748-9058854dbc68\\_en?filename=Albania%20Report%202024.pdf](https://enlargement.ec.europa.eu/document/download/a8eec3f9-b2ec-4cb1-8748-9058854dbc68_en?filename=Albania%20Report%202024.pdf)

<sup>3</sup> European Commission, EU Country Report Albania 2025, [https://enlargement.ec.europa.eu/albania-report-2025\\_en](https://enlargement.ec.europa.eu/albania-report-2025_en)

- <sup>4</sup> Institute for Democracy and Mediation (IDM), National Integrity System Assessment – Albania 2023.
- <sup>5</sup> <https://transparentalbania.al/en>
- <sup>6</sup> Rovena Sulstarova (Institute for Democracy and Mediation Albania – IDM Albania), interview by the IRM, 7 July 2025.
- <sup>7</sup> Klevis Agolli (National Agency for Information Society - NAIS), correspondence with the IRM, 30 July 2025; and Xhoana Ristani and Daniela Laze (Public Procurement Agency), interview by the IRM, 3 July 2025.
- <sup>8</sup> Klevis Agolli (National Agency for Information Society - NAIS), correspondence with the IRM, 30 July 2025.
- <sup>9</sup> European Commission, EU Country Report Albania 2024, [https://enlargement.ec.europa.eu/document/download/a8eec3f9-b2ec-4cb1-8748-9058854dbc68\\_en?filename=Albania%20Report%202024.pdf](https://enlargement.ec.europa.eu/document/download/a8eec3f9-b2ec-4cb1-8748-9058854dbc68_en?filename=Albania%20Report%202024.pdf)
- <sup>10</sup> Albanian Institute of Sciences Organization (AIS), Draft Law on PPP Concessions: AIS (NGO) Raises Concerns regarding Compliance with EU Directives and Calls for Thorough Revision, July 2025, <https://ais.al/new/en/draft-law-on-ppp-concessions-ais-ngo-raises-concerns-regarding-compliance-with-eu-directives-and-calls-for-thorough-revision/>
- <sup>11</sup> Panorama (media outlet), IMF warns on the new Draft Law on PPPs: Do Not Remove Budgetary Limits, 29 July 2025, <https://www.panorama.com.al/qeveria-leshon-serish-doren-me-koncesionet-fmn-verejtje-per-projektligjin-e-ri-te-ppp-ve-mos-hiqni-kufizimet-buxhetore/>
- <sup>12</sup> Eda Noçka (Albanian Legal and Territorial Research Institute/Qendra A.L.T.R.I), interview by the IRM, 8 July 2025; and Rovena Sulstarova (Institute for Democracy and Mediation Albania – IDM Albania), interview by the IRM, 7 July 2025.
- <sup>13</sup> European Commission, EU Country Report Albania 2024, [https://enlargement.ec.europa.eu/document/download/a8eec3f9-b2ec-4cb1-8748-9058854dbc68\\_en?filename=Albania%20Report%202024.pdf](https://enlargement.ec.europa.eu/document/download/a8eec3f9-b2ec-4cb1-8748-9058854dbc68_en?filename=Albania%20Report%202024.pdf)
- <sup>14</sup> Open Contracting Partnership, <https://www.open-contracting.org/data-standard/>
- <sup>15</sup> Eda Noçka (Albanian Legal and Territorial Research Institute/Qendra A.L.T.R.I), interview by the IRM, 8 July 2025.
- <sup>16</sup> Klevis Agolli (National Agency for Information Society - NAIS), correspondence with the IRM, 30 July 2025.
- <sup>17</sup> Eda Noçka (Albanian Legal and Territorial Research Institute/Qendra A.L.T.R.I), interview by the IRM, 8 July 2025.
- <sup>18</sup> Xhoana Ristani and Daniela Laze (Public Procurement Agency), interview by the IRM, 3 July 2025.
- <sup>19</sup> Xhoana Ristani and Daniela Laze (Public Procurement Agency), interview by the IRM, 3 July 2025.
- <sup>20</sup> Xhoana Ristani and Daniela Laze (Public Procurement Agency), interview by the IRM, 3 July 2025.
- <sup>21</sup> Eda Noçka (Albanian Legal and Territorial Research Institute/Qendra A.L.T.R.I), interview by the IRM, 8 July 2025.
- <sup>22</sup> Aranita Brahaj (Albanian Institute of Science - AIS), correspondence with the IRM, 25 July 2025.
- <sup>23</sup> Rovena Sulstarova (Institute for Democracy and Mediation Albania – IDM Albania), interview by the IRM, 7 July 2025.
- <sup>24</sup> Rovena Sulstarova (Institute for Democracy and Mediation Albania – IDM Albania), interview by the IRM, 7 July 2025.
- <sup>25</sup> Xhoana Ristani and Daniela Laze (Public Procurement Agency), interview by the IRM, 3 July 2025.
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- <sup>29</sup> Open Procurement Albania, <https://openprocurement.al/>
- <sup>30</sup> Aranita Brahaj (Albanian Institute of Science - AIS), correspondence with the IRM, 25 July 2025.
- <sup>31</sup> Public Procurement Commission (PPC), correspondence with the IRM, 2 September 2025.
- <sup>32</sup> Updated written report on implementation of OGP Action Plan 2023-2025 for the period March 2023 – June 2024.
- <sup>33</sup> European Commission, EU Country Report Albania 2024, [https://enlargement.ec.europa.eu/document/download/a8eec3f9-b2ec-4cb1-8748-9058854dbc68\\_en?filename=Albania%20Report%202024.pdf](https://enlargement.ec.europa.eu/document/download/a8eec3f9-b2ec-4cb1-8748-9058854dbc68_en?filename=Albania%20Report%202024.pdf)
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- <sup>39</sup> SIGMA, The Principles of Public Administration – Monitoring Report for Albania 2021, [https://www.sigmaweb.org/content/dam/sigma/en/publications/reports/2021/12/monitoring-report-albania-2021\\_43dd2e86/209eb43c-en.pdf](https://www.sigmaweb.org/content/dam/sigma/en/publications/reports/2021/12/monitoring-report-albania-2021_43dd2e86/209eb43c-en.pdf)
- <sup>40</sup> Eris Çela (Directorate for RIA and Public Consultation), interview by the IRM, 8 July 2025.
- <sup>41</sup> All semi-annual and annual reports on public consultations are publicly available at the Electronic Register on Public Notifications and Consultations, <https://www.konsultimipublik.gov.al/Konsultime/InstitucionReports/121>
- <sup>42</sup> These include the number of primary legislation and policy documents published for consultation; whether legislation undergoing RIA is also subject to consultation; exceptions to the consultation process; duration of consultations; usage levels of

the online consultation platform; public meetings; involvement of external stakeholders in drafting and consultation; institutional feedback and acceptance of input; and implementation of annual public consultation plans.

<sup>43</sup> Office of the Prime Minister, Annual Performance Report for Public Consultation for the year 2024, <https://www.konsultimipublik.gov.al/documents/reports/Raport%20vjetor%20i%20performanc%C3%ABs%20s%C3%AB%20kon-sultimeve%20publike%202024.pdf>

<sup>44</sup> Eris Çela (Directorate for RIA and Public Consultation), interview by the IRM, 8 July 2025.

<sup>45</sup> Diana Leka and Elvis Zerva (Albanian Investment Council), interview by the IRM, 3 July 2025.

<sup>46</sup> Silvana Rusi (Cabinet of the Minister of State for Public Administration and Anti-Corruption), interview by the IRM, 28 August 2025.

<sup>47</sup> Diana Leka and Elvis Zerva (Albanian Investment Council), interview by the IRM, 3 July 2025.

<sup>48</sup> Official Gazette of Albania, General Analytical Program of Project Acts to be submitted for approval to the Council of Ministers during 2024, December 2023, <https://qbz.gov.al/eli/vendim/2023/12/28/790>

<sup>49</sup> Official Gazette of Albania, General Analytical Program of Project Acts to be submitted for approval to the Council of Ministers during 2025, December 2024, <https://qbz.gov.al/eli/vendim/2024/12/26/818>

<sup>50</sup> Information received by the IRM during the pre-publication review of this report, 9 December 2025.

<sup>51</sup> European Commission, EU Country Report Albania 2024, [https://enlargement.ec.europa.eu/document/download/a8eec3f9-b2ec-4cb1-8748-9058854dbc68\\_en?filename=Albania%20Report%202024.pdf](https://enlargement.ec.europa.eu/document/download/a8eec3f9-b2ec-4cb1-8748-9058854dbc68_en?filename=Albania%20Report%202024.pdf)

<sup>52</sup> Dior Angjeli (Institute for Democracy and Mediation Albania – IDM Albania), interview by the IRM, 7 July 2025.

<sup>53</sup> Institute for Democracy and Meditation (IDM Albania), Public Consultation in Albania – the Illusion of Inclusion, 2024, <https://idmalbania.org/publication-cpt/monitoring-report-public-consultation-in-albania-the-illusion-of-inclusion/>

<sup>54</sup> Diana Leka and Elvis Zerva (Albanian Investment Council), interview by the IRM, 3 July 2025.

<sup>55</sup> SIGMA, Public Administration in Albania 2024 - Assessment against the Principles of Public Administration, [https://www.sigmaweb.org/en/publications/public-administration-in-albania-2024\\_5577d117-en.html](https://www.sigmaweb.org/en/publications/public-administration-in-albania-2024_5577d117-en.html)

<sup>56</sup> Dior Angjeli (Institute for Democracy and Mediation Albania – IDM Albania), interview by the IRM, 7 July 2025.

<sup>57</sup> Dior Angjeli (Institute for Democracy and Mediation Albania – IDM Albania), interview by the IRM, 7 July 2025.

<sup>58</sup> Diana Leka and Elvis Zerva (Albanian Investment Council), interview by the IRM, 3 July 2025.

<sup>59</sup> Aranita Brahaj (Albanian Institute of Science - AIS), correspondence with the IRM, 25 July 2025.

<sup>60</sup> European Commission, EU Country Report Albania 2023, [https://enlargement.ec.europa.eu/system/files/2023-11/SWD\\_2023\\_690%20Albania%20report.pdf](https://enlargement.ec.europa.eu/system/files/2023-11/SWD_2023_690%20Albania%20report.pdf)

<sup>61</sup> Information received by the IRM during the pre-publication review of this report, 9 December 2025.

<sup>62</sup> Updated written report on implementation of OGP Action Plan 2023-2025 for the period January 2024 – May 2025.

<sup>63</sup> Eris Çela (Directorate for RIA and Public Consultation), interview by the IRM, 8 July 2025.

<sup>64</sup> SIGMA, Public Administration in Albania 2024 - Assessment against the Principles of Public Administration, [https://www.sigmaweb.org/en/publications/public-administration-in-albania-2024\\_5577d117-en.html](https://www.sigmaweb.org/en/publications/public-administration-in-albania-2024_5577d117-en.html)

<sup>65</sup> Dior Angjeli (Institute for Democracy and Mediation Albania – IDM Albania), interview by the IRM, 7 July 2025.

<sup>66</sup> Institute for Democracy and Meditation (IDM Albania), Public Consultation in Albania – the Illusion of Inclusion, 2024, <https://idmalbania.org/publication-cpt/monitoring-report-public-consultation-in-albania-the-illusion-of-inclusion/>

<sup>67</sup> European Commission, EU Country Report Albania 2024, [https://enlargement.ec.europa.eu/document/download/a8eec3f9-b2ec-4cb1-8748-9058854dbc68\\_en?filename=Albania%20Report%202024.pdf](https://enlargement.ec.europa.eu/document/download/a8eec3f9-b2ec-4cb1-8748-9058854dbc68_en?filename=Albania%20Report%202024.pdf)

<sup>68</sup> Information received by the IRM during the pre-publication review of this report, 9 December 2025.

<sup>69</sup> Eris Çela (Directorate for RIA and Public Consultation), interview by the IRM, 8 July 2025.

<sup>70</sup> Dior Angjeli (Institute for Democracy and Mediation Albania – IDM Albania), interview by the IRM, 7 July 2025.

<sup>71</sup> Eris Çela (Directorate for RIA and Public Consultation), interview by the IRM, 8 July 2025.

<sup>72</sup> Partners Albania for Change and Development, Monitoring Matrix on Enabling Environment for Civil Society Development – Country Report Albania 2024, <https://www.partnersalbania.org/publication/monitoring-matrix-on-enabling-environment-for-csos-development-country-report-for-albania-2024/>

<sup>73</sup> Diana Leka and Elvis Zerva (Albanian Investment Council), interview by the IRM, 3 July 2025.

## Section III. Participation and Co-Creation

**Albania’s 2023-2025 action plan was the country’s first to be developed with the support of a multi-stakeholder forum. The development of the action plan saw greater government-civil society collaboration compared to previous plans. The Multi-Stakeholder Committee was functional throughout the action plan cycle, but civil society’s contributions to the plan’s development and implementation were limited.**

The Minister of State for Public Administration and Anti-Corruption leads the OGP process at the political level, while a point of contact in the Office of the Prime Minister coordinates the process at the technical level. Both institutions closely coordinate efforts to collect information from implementing bodies on the progress of action plan commitments and to prepare for the meetings of the Multi-Stakeholder Committee (MSC).<sup>1</sup> During the first six months of this action plan (April to September 2023), political leadership for OGP was held by the Minister of State for Service Standards. Following changes in the government’s structure in September 2023, this position was abolished.<sup>2</sup> The Minister of State for Public Administration and Anti-Corruption was established in January 2024, with a mandate to oversee the implementation of good governance principles, including the OGP process.<sup>3</sup> Full institutional arrangements of this new role were finalized by May 2024. Without a designated political lead, the MSC did not meet during this interim period. However, technical coordination from the Office of the Prime Minister and implementation by responsible institutions continued.

The MSC (Albanian: Komiteti Shumëpalësh) is Albania’s first formal multi-stakeholder forum for OGP. It was established by a Prime Minister decision in December 2021.<sup>4</sup> The MSC is composed of 17 members: 11 senior government representatives, one representative from the largest local government association, and five civil society members. According to the Rules of Procedure of the MSC, the Agency for Support to Civil Society is mandated to select MSC members from the National Council for Civil Society (NCCS), who are elected by civil society through open procedures.<sup>5</sup> During the implementation of the 2023–2025 action plan, the selection of new civil society members faced delays. During the first year of this action plan, the MSC operated with two members selected by the Agency for Support to Civil Society when the MSC was established in 2022, while in July 2024 three new civil society members were added through the same procedure. According to the decision, the MSC is to be co-chaired by the political lead from the government and a civil society member elected from among the MSC’s civil society representatives. During the 2023-2025 action plan, the MSC was primarily led by the government co-chair (initially by the Minister of State for Service Standards, and then by the Minister of State for Public Administration and Anti-Corruption), as civil society members elected their co-chair only in June 2025.<sup>6</sup> The 2021 decision also stipulates that the MSC should meet at least three times a year. In practice, the MSC met twice during 2023, three times in 2024, and once in 2025 (on 19 September 2025, after the end of the action plan).<sup>7</sup>

Albania maintains a webpage dedicated to the OGP process ([ogp.gov.al](http://ogp.gov.al)) offering information in both Albanian and English, including a Repository section. During the implementation period of the 2023–2025 action plan, the uploading of new documents and maintenance of the Repository were infrequent, with extended periods of inactivity. There was no formal tracking system in place to monitor the progress of action plan commitments. The only updates were provided at MSC meetings, and two progress reports were collected by the point of contact in

2024 and 2025 respectively but not published.<sup>8</sup> There was no public communication on progress via the OGP website or other channels.

### **Action Plan Co-Creation**

As pointed out in the IRM Action Plan Review, the development of Albania's 2023-2025 action plan involved more active government-civil society collaboration compared to previous plans. The MSC was functional during the development of the action plan. The government undertook several consultative activities, including six thematic surveys, one national survey, and seven meetings with civil society and other stakeholders. The draft plan was open for an online public consultation during March 2023. The government provided feedback on why certain civil society proposals were or were not included in the action plan.<sup>9</sup> However, some MSC members indicated that either they did not take part in co-creation meetings because they felt that their opinions would not be considered or they were not aware that they could have proposed commitments during the co-creation process.<sup>10</sup> Government representatives expressed their satisfaction that the IRM assessed the development of this action plan as meeting the OGP minimum requirements for co-creation, the first time for Albania since the development of its 2016-2018 action plan.<sup>11</sup>

### **Participation During Implementation**

Following the adoption of the action plan in the MSC meeting on 24 March 2023, the MSC met three times during the implementation period, on 24 May 2024, 30 October 2024, and 13 November 2024. The meeting notes indicate that meetings were generally limited in depth and frequency<sup>12</sup> and that there was no broader outreach beyond the MSC members. However, the essential functions of the MSC were carried out during those meetings, with civil society representatives having the opportunity to provide input and minutes of meetings made available. However, progress updates from government representatives did not involve substantial discussions with participants. Government representatives indicate that the reasons for the lack of meetings during most of 2023 was the gap in political leadership of the OGP process following the restructuring of the government. This restructuring resulted in the absence of a co-chair of the MSC from September 2023 to May 2024. During the first semester of 2025, no MSC meeting was organized to avoid implications of political interference prior to the May 2025 national elections in Albania.<sup>13</sup> The MSC is a consultative body without decision-making authority, and implementation of the engagements continued uninterrupted at the technical level through the OGP Technical Secretariat and participating institutions. The MSC's mandate has been refined through the amendment of the DCoM, which provides in Article 5 that the minister co-chairs the MSC (DCoM No. 522/2025).<sup>14</sup>

From the government perspective, there is an impression that the open approach of the government improved the participation of civil society in both co-creation and implementation of this action plan.<sup>15</sup> However, representatives of well-established CSOs working in areas covered by commitments of the action plan but not formal members of the MSC expressed concerns of a decreasing level of cooperation with civil society in the OGP process.<sup>16</sup> They indicated that, while the number of organizations listed in the action plans increased, cooperation with civil society worsened (with few exceptions), referring to fewer joint activities, presentations of progress, and other concrete activities related to both the OGP process,<sup>17</sup> and cooperation in implementation of specific activities of the action plan.<sup>18</sup>

The IRM uses the OGP Participation and Co-Creations Standards to assess countries' participatory practices throughout the action plan cycle.<sup>19</sup> Countries are encouraged to aim for

the full ambition of the standards and to comply with the minimum requirements under each standard.<sup>20</sup>

**Table 2. Compliance with Minimum Requirements**

Minimum requirement	Co-creation	Implementation
<b>1.1 Space for dialogue:</b> The Multi-Stakeholder Committee (MSC), established in December 2021, oversees Albania's OGP process. During co-creation, the MSC met four times between 11 November 2022 and 24 March 2023. The MSC met three times during the implementation period (24 March 2023 to 30 June 2025), on 24 May 2024, 30 October 2024, and 13 November 2024. The MSC did not meet during the second semester of 2023 and first semester of 2025. The agendas, lists of participants, and minutes of its meetings are available on the OGP webpage. <sup>21</sup> The Order of the Prime Minister of 2021 establishing the MSC <sup>22</sup> contains the basic rules, though the Rules of Procedures adopted by the MSC in 2022 are not published.	Yes	No
<b>2.1 OGP website:</b> Albania has a publicly accessible OGP webpage. It contains the latest action plan, <sup>23</sup> detailed information on the co-creation process, <sup>24</sup> and information about the meetings of the MSC during implementation.	Yes	Yes
<b>2.2 Repository:</b> There is an online repository. <sup>25</sup> It contains information on MSC meetings during 2024, and the country's action plan uploaded during May 2025. However, there is no information or evidence on the implementation of commitments of the 2023-2025 action plan, or other updates during the implementation period (April 2023 to end of May 2025).	Yes	No
<b>3.1 Advanced notice:</b> See the Action Plan Review <sup>26</sup>	Yes	Not applicable
<b>3.2 Outreach:</b> See the Action Plan Review	Yes	Not applicable
<b>3.3 Feedback mechanism:</b> See the Action Plan Review	Yes	Not applicable
<b>4.1 Reasoned response:</b> See the Action Plan Review	Yes	Not applicable
<b>5.1 Open implementation:</b> The MSC met three times during the implementation period (between 24 March 2023 and 30 June 2025), on 24 May 2024, 30 October 2024, and 13 November 2024. No meetings were organized during the second semester of 2023 and first semester of 2025. <sup>27</sup> Information about the progress of some commitments was presented during these MSC meetings, and civil society representatives could comment on the progress.	Not applicable	No

- <sup>1</sup> Silvana Rusi (Cabinet of the Minister of State for Public Administration and Anti-Corruption), interview by the IRM, 28 August 2025.
- <sup>2</sup> Silvana Rusi (Cabinet of the Minister of State for Public Administration and Anti-Corruption), interview by the IRM, 28 August 2025.
- <sup>3</sup> Council of Ministers of Albania, Decision No:29 dated 17.01.2024 “for the definition of the area of state responsibility for the Minister of State for Public Administration and Anti-Corruption”, <https://www.qbz.gov.al/eli/fz/2024/14/f490f1f3-ff71-4ce1-9fd2-335db94e4d16>
- <sup>4</sup> Prime Minister’s Order No.145 dated 20.12.2021 on establishing and functioning of the Multi-Stakeholder Committee on Open Government Partnership, [https://ogp.gov.al/uploads/2022/12/UKM\\_Nr\\_145\\_Dt\\_20\\_12\\_2021.pdf](https://ogp.gov.al/uploads/2022/12/UKM_Nr_145_Dt_20_12_2021.pdf)
- <sup>5</sup> The CSO members are selected around the following areas: 1) democratization, rule of law, human rights and European integration; 2) economic development; 3) territorial development; 4) environmental development; 5) welfare, social services, and health protection.
- <sup>6</sup> Silvana Rusi (Cabinet of the Minister of State for Public Administration and Anti-Corruption), interview by the IRM, 28 August 2025.
- <sup>7</sup> The data collected for this report include the period until end of August 2025.
- <sup>8</sup> Kornelia Ferizaj (OGP Point of Contact in Albania, Office of the Prime Minister), interview by the IRM, 29.05.2025
- <sup>9</sup> Open Government Partnership, Independent Reporting Mechanism, Action Plan Review: Albania 2023-2025, [https://www.opengovpartnership.org/wp-content/uploads/2024/02/Albania\\_Action-Plan-Review\\_2023-2025\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2024/02/Albania_Action-Plan-Review_2023-2025_EN.pdf)
- <sup>10</sup> Open Government Partnership, Independent Reporting Mechanism, Action Plan Review: Albania 2023-2025, [https://www.opengovpartnership.org/wp-content/uploads/2024/02/Albania\\_Action-Plan-Review\\_2023-2025\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2024/02/Albania_Action-Plan-Review_2023-2025_EN.pdf)
- <sup>11</sup> Silvana Rusi (Cabinet of the Minister of State for Public Administration and Anti-Corruption), interview by the IRM, 28 August 2025.
- <sup>12</sup> The Action Plan 2023-2025 was adopted in the MSC meeting of 24 March 2023. During the implementation period, until June 2025, the MSC meetings were held on 24 May 2024, 30 October 2024, and 13 November 2024.
- <sup>13</sup> Silvana Rusi (Cabinet of the Minister of State for Public Administration and Anti-Corruption), interview by the IRM, 28 August 2025.
- <sup>14</sup> The Decision of the Council of Ministers No. 522/2025 “On defining the scope of state responsibility of the Minister of State for Public Administration and Anti-Corruption.” <https://qbz.gov.al/eli/fz/2025/173/5f9fd781-2c33-461f-a8a6-9bc6cfe04c4e>
- <sup>15</sup> Silvana Rusi (Cabinet of the Minister of State for Public Administration and Anti-Corruption), interview by the IRM, 28 August 2025.
- <sup>16</sup> Rovena Sulstarova (Institute for Democracy and Mediation Albania – IDM Albania), interview by the IRM, 7 July 2025.
- <sup>17</sup> Aranita Brahaj (Albanian Institute of Science - AIS), correspondence with the IRM, 25 July 2025.
- <sup>18</sup> Rovena Sulstarova (Institute for Democracy and Mediation Albania – IDM Albania), interview by the IRM, 7 July 2025.
- <sup>19</sup> Open Government Partnership, OGP Participation and Co-Creation Standards, 2021, <https://www.opengovpartnership.org/ogp-participation-co-creation-standards/>
- <sup>20</sup> Open Government Partnership, IRM Guidelines for the Assessment of Minimum Requirements,, 2022, [https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements\\_20220531\\_EN.pdf](https://www.opengovpartnership.org/wp-content/uploads/2022/05/IRM-Guidelines-for-Assessment-of-Minimum-Requirements_20220531_EN.pdf)
- <sup>21</sup> OGP, see <https://ogp.gov.al/kategori/repozitori>
- <sup>22</sup> The Order of the Prime Minister No:145, dated 20<sup>th</sup> of December 2021, for establishment and the functioning of the Multi Stakeholder Committee for the Open Government Partnership, [https://ogp.gov.al/uploads/2022/12/UKM\\_Nr\\_145\\_Dt\\_20\\_12\\_2021.pdf](https://ogp.gov.al/uploads/2022/12/UKM_Nr_145_Dt_20_12_2021.pdf)
- <sup>23</sup> OGP, National Action Plan 2023-25, see <https://ogp.gov.al/faqe/plani-kombetar-i-veprimit-2022-2024>
- <sup>24</sup> OGP, Co-Creation Process, see <https://ogp.gov.al/faqe/procesi-i-bashke-krijimit>
- <sup>25</sup> OGP, Repositories, see <https://ogp.gov.al/kategori/repozitori>
- <sup>26</sup> Open Government Partnership, Albania’s Action Plan Review 2023-2025, <https://www.opengovpartnership.org/documents/albania-action-plan-review-2023-2025/>
- <sup>27</sup> OGP, Repositories, see <https://ogp.gov.al/kategori/repozitori>

## Section IV. Methodology

This report supports countries' accountability and learning through assessment of the action plan's level of completion and early results. The report provides in-depth analysis of commitments or clusters that achieved the strongest early results in the action plan. It also assesses the country's participation and co-creation practices throughout the action plan cycle.<sup>1</sup>

The IRM products provided during a national action plan cycle include:

- **Co-Creation Brief:** A concise brief that highlights lessons from previous IRM reports to support a country's OGP process, action plan design, and overall learning.
- **Action Plan Review:** A technical review of the characteristics of the action plan and the strengths and challenges the IRM identifies to inform a stronger implementation process.
- **Midterm Review:** A review for four-year action plans after a refresh at the midpoint. The review assesses new or significantly amended commitments in the refreshed action plan, compliance with OGP rules, and provides an informal update on implementation progress.
- **Results Report:** An overall implementation assessment that focuses on policy-level results and how changes happen. It also checks compliance with OGP rules and informs accountability and longer-term learning.

In Results Reports, the IRM assesses commitments using two indicators:

### Completion

The IRM assesses the level of completion for each commitment in the action plan, including commitments clustered in the Action Plan Review.<sup>2</sup> The level of completion for all commitments is assessed as one of the following:

- No Evidence Available
- Not Started
- Limited
- Substantial
- Complete

### Early Results

The IRM assesses the level of early results from implementation for each commitment or cluster. To do so, the IRM considers commitments' objective, the country context, the policy area, and the evidence of changes. The Early Results indicator is determined by the depth of change that occurred and the evidence of whether the change will be sustained in time. The early results indicator establishes three levels of results:

- **No Notable Results:** According to the evidence collected (through desk research, interviews, etc.), the implementation of the open government commitment led to little or no positive results. After assessing the activities carried forward during the period of implementation and its outcomes (if any), the IRM did not find meaningful changes towards:
  - improving practices, policies, or institutions governing a policy area or within the public sector,
  - enhancing the enabling environment to build trust between citizens and the state.

- **Moderate Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
  - improving practices, policies, or institutions governing a policy area or within the public sector, or
  - enhancing the enabling environment to build trust between citizens and the state.
- **Significant Results:** According to the evidence collected (through desk research, interviews, etc.) the implementation of the open government commitment led to significant positive results. After assessing the activities carried forward during the period of implementation and its outcomes, the IRM found meaningful changes towards:
  - improving practices, policies, or institutions governing a policy area or within the public sector, or
  - enhancing the enabling environment to build trust between citizens and the state.

Significant positive results show clear expectations for these changes (as defined above) will be sustainable in time.

This report was prepared by the IRM in collaboration with Taulant Hoxha and was reviewed by Jeff Lovitt, IRM external expert. The IRM methodology, quality of IRM products and review process are overseen by the IRM's International Experts Panel (IEP).<sup>3</sup> For more information, refer to the IRM webpage<sup>4</sup> or the glossary of IRM and OGP terms.<sup>5</sup>

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<sup>1</sup> For definitions of OGP terms, such as co-creation and promising commitments, see OGP Glossary, <https://www.opengovpartnership.org/glossary/>

<sup>2</sup> The IRM clusters commitments that share a common policy objective during the Action Plan Review process. In these instances, the IRM assesses "Potential for Results" and "Early Results" at the cluster level. The level of completion is assessed at the commitment level. For more information on how the IRM clusters commitments, see Section IV on Methodology in the Action Plan Review.

<sup>3</sup> Open Government Partnership, Independent Reporting Mechanism, International Experts Panel, <https://www.opengovpartnership.org/about/who-we-are/international-experts-panel/>

<sup>4</sup> Open Government Partnership, IRM Overview, <https://www.opengovpartnership.org/irm-guidance-overview/>

<sup>5</sup> Open Government Partnership, OGP Glossary, <https://www.opengovpartnership.org/glossary/>

## Annex I. Commitment Data<sup>1</sup>

### Commitment 1: Awareness and education of the general public on mechanisms in the fight against corruption

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|--|--|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Substantial</li> <li>• <b>Early results:</b> Moderate Results</li> </ul> |
|--|--|

Commitment 1 aimed to raise awareness and educate the public, civil society, and public officials on anti-corruption mechanisms.

Overall, completion was substantial. Promotional videos,<sup>2</sup> posters, and newsletters<sup>3</sup> were prepared, and social media activity increased. Other outreach efforts included media campaigns and discussion forums. In addition, the annual Intersectoral Strategy Against Corruption (ISAC) monitoring reports provide information on awareness-raising activities carried out in 2024.<sup>4</sup> The Ministry of Justice, in its capacity as National Anti-Corruption Coordinator,<sup>5</sup> organized national campaigns on an annual basis, notably the “Week of Integrity”, alongside discussion forums on anti-corruption, reported in the ministry’s December 2023 e-bulletin.<sup>6</sup> Also, implementation included other high-visibility initiatives, such as Integrity Week in December 2024, public forums with the private sector and academia, open lectures in universities, practitioner trainings (including for public administration staff and political advisers), and the launch of an introductory anti-corruption training module for public officials, alongside regular monthly e-bulletins and media outreach. A substantial number of meetings and open lectures have been organized in schools and universities,<sup>7</sup> and cooperation with CSOs led to the creation of a national CSO anti-corruption network, and its digital platform developed by civil society.<sup>8</sup> This platform developed the methodology for measuring public perception on corruption<sup>9</sup> with the General Directorate on Anti-Corruption supporting the public consultation process,<sup>10</sup> while the Ministry of Justice, supported by EU technical assistance, developed the anti-corruption vocabulary.<sup>11</sup>

Integrity Week 2023 included integrity and ethics-focused capacity-building activities for public administration practitioners and dedicated training on ethics, integrity, and conflicts of interest for political advisers. A corruption risk assessment methodology was drafted and published in March 2025, and its rollout was supported through a series of targeted trainings delivered from April to July 2025, with EU technical assistance. Also, a manual on administrative investigation was drafted but not adopted due to institutional restructuring. According to the ISAC monitoring reports, integrity plans have been regularly adopted by all line ministries, by a growing number of subordinate institutions, the Ministers of State, several independent authorities (including the Assembly of Albania and the Commissioner for the Right to Information and Protection of Personal Data), as well as 31 municipalities. On the other hand, CSOs like the Institute for Democracy and Mediation (IDM) advanced integrity monitoring independently through its National Integrity Systems Assessment.<sup>12</sup>

Overall, this commitment has achieved moderate early results in advancing the transparency of anti-corruption mechanisms in Albania compared to the situation before the action plan.

Going forward, the coordination of these activities has moved from the Ministry of Justice to the Directorate at the Ministry of State for Public Administration and Anti-Corruption.

**Commitment 2: Raising awareness of the reporting entities regarding the beneficial owners’ registration and data update obligation**

- |   |  |
|---|--|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• This commitment has been clustered as: Beneficial ownership transparency (Commitments 2, 3, and 4 of the action plan)</li> <li>• <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Early results:</b> No Notable Results</li> </ul> |
|---|--|

Commitment 2 aimed to raise awareness among reporting entities (such as companies, banks, and notaries) of their legal obligation to register and update information on beneficial owners. Planned activities included pop-up notifications on the National Business Center (NBC) and e-Albania portals, direct notifications to newly registered entities, awareness videos, and consultative meetings with professional groups.

According to the government’s progress report, the NBC organized one consultative meeting in August 2023 to inform entities of their obligations. There are no reports of other activities being implemented during the assessment period. As a result, completion was limited.

**Commitment 3: Evaluate best practices of EU countries on beneficial owners’ data registration**

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|--|--|
| <ul style="list-style-type: none"> <li>⊘ <b>Verifiable:</b> Yes</li> <li>⊘ <b>Does it have an open government lens?</b> No</li> <li>⊘ This commitment has been clustered as: Beneficial ownership transparency (Commitments 2, 3, and 4 of the action plan)</li> <li>⊘ <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>⊘ <b>Completion:</b> Limited</li> <li>⊘ <b>Early results:</b> No Notable Results</li> </ul> |
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Commitment 3 aimed to evaluate EU best practices on beneficial ownership data registration and share them with reporting entities and interest groups. The milestones included meetings and trainings to present reports or manuals on best practices and to build the capacity of relevant stakeholders.

According to the government’s progress report, several meetings were held where the National Business Center (NBC) exchanged experiences with counterparts from North Macedonia, Kosovo, and EU networks. NBC also participated in international events such as the European Business Registry Association meetings in Portugal<sup>13</sup> and Italy,<sup>14</sup> and seminars organized by the American Bar Association (May 2024) and the International Republican Institute (June 2024). These engagements enabled NBC to gather knowledge on beneficial

ownership transparency practices.

However, there is no information on implementation of the planned training activities for reporting entities and interest groups, nor on the production of the manual on best practices. As a result, implementation remained limited, with activities focused more on institutional exposure than on delivering tangible outputs for domestic stakeholders.

**Commitment 4: Review the legislation in beneficial owners’ registration**

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|---|--|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• This commitment has been clustered as: Beneficial ownership transparency (Commitments 2, 3, and 4 of the action plan)</li> <li>• <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> No Evidence Available</li> <li>• <b>Early results:</b> No Notable Results</li> </ul> |
|---|--|

Commitment 4 aimed to improve procedures for registering beneficial ownership data through a review of legislation. It included preparing a summary report with proposals for potential legal amendments and holding consultative meetings with interest groups.

There is no information on whether the summary report was prepared, or whether consultations with stakeholders took place during the implementation period.

**Commitment 5: Public awareness on the mechanisms of access to justice**

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|--|--|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Substantial</li> <li>• <b>Early results:</b> Moderate Results</li> </ul> |
|--|--|

Commitment 5 aimed to raise awareness of free legal aid and improve access to justice, especially for vulnerable groups. Planned milestones included awareness campaigns on the Free Legal Aid law, preparation of accessible information in sign language and Braille, awareness activities for children at risk, and open forums for citizen participation.

Some progress was achieved, particularly through the Directorate for Free Legal Aid (DFLA), the National Chamber of Mediation (NCM), and civil society partners. According to the government’s progress report, hundreds of awareness activities were organized nationwide,<sup>15</sup> including over 791 meetings by DFLA and local centers, 700 activities by NCM, and specific outreach to minors and vulnerable groups.<sup>16</sup> Public institutions and civil society developed materials about free legal aid, including videos in sign language,<sup>17</sup> manuals in Braille, manuals for the public,<sup>18</sup> and informational leaflets. New Free Legal Aid centers were also opened in six municipalities (Kavajë, Tropojë, Mat, Përmet, Pukë, and Korçë),<sup>19</sup> extending outreach beyond the original plan. Government updates indicate stronger delivery during 2025, with primary legal aid centers fully integrating into the state budget, and DFLA carrying out 488 awareness activities nationwide, prioritizing remote areas through OSCE-supported mobile

outreach in locations such as Fushë Arrëz, Vau i Dejës, and Malësi e Madhe, while also documenting 74 legal aid “success stories.” In parallel, the National Chamber of Mediators reported over 2,000 cases resolved through mediation, the establishment of three local branches (Durrës, Elbasan, Vlorë), and preparation of a mediation methodology under the EU-Mediation project, suggesting concrete service-level outputs even as broader participation formats (such as open forums) were less evident.<sup>20</sup>

There was no specific information on implementation of several milestones, such as restorative justice programs in schools and open forums with citizen participation. Others were partially implemented, such as updating online child-friendly information or conducting school-based information activities. While awareness campaigns were widespread, they mostly replicated existing formats, this commitment, taken as a whole, led to moderate early results in terms of improved citizen uptake or systemic change.

**Commitment 6: Add automatic data to the open data portal and conduct an Open Data Readiness Assessment**

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|--|--|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Early results:</b> No Notable Results</li> </ul> |
|--|--|

Commitment 6 aimed to expand the number of datasets available on Albania’s open data portal by conducting an Open Data Readiness Assessment (ODRA) and upgrading the portal with new automatic datasets.

Implementation was limited. According to the government’s progress report, a consulting company was engaged to produce the ODRA, and in April 2025 a stakeholder workshop was organized, but no report or follow-up actions were available at the time of assessment. No new datasets were added to the open data portal, and no upgrades or promotional activities for the portal were reported during the implementation period. As a result, the commitment has not yet achieved notable early results.

**Commitment 7: Identify proactive life-events and implement at least one life event in e-Albania portal**

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|---|--|
| <ul style="list-style-type: none"> <li>€ <b>Verifiable:</b> Yes</li> <li>€ <b>Does it have an open government lens?</b> No</li> <li>€ <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>€ <b>Completion:</b> Limited</li> <li>€ <b>Early results:</b> No Notable Results</li> </ul> |
|---|--|

Commitment 7 aimed to redesign the e-Albania portal around a “life events” model, making it easier for citizens to locate relevant services. The plan foresaw identifying possible life events and implementing at least one on the portal by 2024.

According to the government’s progress report, six priority life events were identified (birth of a child, disability, job seeking, planning for retirement, starting a new business, and change of residence). However, there is no evidence of a formal analysis or plan guiding their

integration. While these categories are important areas of citizen interaction with government, implementation on the portal had not advanced at the time of reporting. No life event was fully operationalized on the portal by 2024.

**Commitment 8: Transpose EU web accessibility directive for government portals**

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|--|--|
| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Early results:</b> No Notable Results</li> </ul> |
|--|--|

Commitment 8 aimed to increase the accessibility of e-Albania and other government portals for persons with disabilities by transposing the EU Web Accessibility Directive (2016/2102) into national law. The main milestone was to adopt a new legal basis aligned with the directive, enabling compliance with EU standards.

By the end of the assessment period, no steps had been taken to transpose the directive, and no related legislation had been introduced. In the progress report, the government has indicated that transposition is planned for 2025. Government updates indicate that National Agency of Information Society (NAIS) has initiated the process and is working intensively on the transposition of the directive, including to improve the e-Albania government platform for persons with disabilities.<sup>21</sup> As a result, implementation is assessed as limited.

**Commitment 9: Develop citizen feedback mechanism for electronic services**

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|--|--|
| <ul style="list-style-type: none"> <li>⊘ <b>Verifiable:</b> Yes</li> <li>⊘ <b>Does it have an open government lens?</b> Yes</li> <li>⊘ <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>⊘ <b>Completion:</b> Limited</li> <li>⊘ <b>Early results:</b> No Notable Results</li> </ul> |
|--|--|

Commitment 9 aimed to strengthen mechanisms for collecting citizen feedback on e-services. The plan envisioned developing evaluation criteria for e-government systems and engaging civil society and start-ups active in digitalization to co-design portal improvements.

Progress was limited. A five-level star-rating mechanism with the option to comment was introduced on the open data portal,<sup>22</sup> allowing users to provide feedback on the usefulness and quality of datasets. While this represents a first step toward interactive feedback, it did not extend to the broader e-government service environment as intended. There is no evidence that structured collaboration with civil society or start-ups took place to guide the design or improvement of feedback tools. At the time of assessment, no notable early results were observed in terms of improved service design or responsiveness based on citizen input. The Government of Albania clarified that this commitment is scheduled for completion by February 2026, in line with the institution’s planned follow-up actions.<sup>23</sup>

**Commitment 10: Public awareness on the role of Ministry of Defense and Armed Forces of the Republic of Albania**

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| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Substantial</li> <li>• <b>Early results:</b> Moderate Results</li> </ul> |
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<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul>	
<p>Commitment 10 aimed to strengthen the Ministry of Defense (MoD)'s and the Armed Forces (FARSH)'s communication with the public, cooperating with academia, and fostering innovation in defense and security. Key milestones included establishing the Security and Defense Information Center (SDIC) and increasing citizens' knowledge of MoD and FARSH's role and mission.</p> <p>The SDIC was formally established in July 2023 by a decision of the Council of Ministers,<sup>24</sup> and began operations in April 2024.<sup>25</sup> Since its launch, it has focused on building partnerships with businesses, academia, NGOs, and international networks, including NATO's Defence Innovation Accelerator for the North Atlantic (DIANA) initiative. This milestone is substantially completed and has positioned the SDIC as a hub for innovation and mentorship in security and defense.</p> <p>Progress on public information campaigns has been limited. While the SDIC contributed through events, exercises, and entrepreneurship activities that indirectly raised awareness about defense modernization and the FARSH's evolving role, there was no broad, sustained communication effort aimed at citizens.</p> <p>Overall, the commitment has achieved substantial completion with moderate early results. The establishment of the SDIC is a notable institutional innovation, but broader objectives of sustained public awareness and citizen engagement in defense matters are only partially met.</p>	
<p><b>Commitment 11: Youth database</b></p>	
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Early results:</b> No Notable Results</li> </ul>
<p>Commitment 11 aimed to create a national youth database for state institutions and non-state stakeholders to collect and exchange information on youth conditions and needs. The objective was to support planning, monitoring, and evaluation of youth policies at both central and local levels.</p> <p>Progress has been limited. According to the government's progress report, the National Agency for Information Society (NAIS) and the National Agency for Youth (NAY) prepared a technical document on the database architecture in 2023, following input from a working group. Work on the Terms of Reference continued through 2024, and plans shifted toward merging two existing platforms: the Youth Electronic Registry and the Electronic System for Funding Youth Projects. However, the need to align with the amended Law on Youth (adopted in April 2025) caused delays.</p> <p>Key milestones, including the establishment and testing of the database and the national communication campaign for registration, have been postponed to 2026. As a result, no visible outputs have reached citizens or CSOs during the reporting period.</p>	

<b>Commitment 12: Public awareness on budget transparency</b>	
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Early results:</b> No Notable Results</li> </ul>
<p>Commitment 12 aimed to enhance citizen engagement in budget planning and monitoring. It involved strengthening fiscal risk reporting, developing key performance indicators (KPIs) for budget execution, promoting gender budgeting, and holding hearings and workshops with civil society.</p> <p>According to the government’s progress report, some milestones saw progress, such as the preparation of the first official Fiscal Risk Statements for 2023<sup>26</sup> and 2024,<sup>27</sup> adoption of a new guideline for budget monitoring templates with KPIs,<sup>28</sup> and ongoing gender budget monitoring by CSOs. In addition, during the fiscal year 2025, the Citizens’ Budget Execution Report for 2024 was published on the official website of the Ministry of Finance.<sup>29</sup> However, hearings with civil society and broad awareness-raising workshops did not take place or reached only a small audience. For example, no hearings with civil society were reported during 2024 and only two ministries organized CSO hearings in 2025, despite this being a formal requirement. Awareness efforts were mainly confined to small-scale trainings in vocational schools, reaching a few hundred students.</p> <p>Gender-responsive budgeting advanced through the work of the Ministry of Finance and the Ministry of Health and Social Welfare, with the assistance of the UN Women Office in Tirana. It was also supported by NGO-led initiatives, including monitoring reports for 2023,<sup>30</sup> 2024,<sup>31</sup> and 2025,<sup>32</sup> and capacity building for municipal staff. Currently, there are over 85 budget programs applying gender-responsive budgeting, representing about 9.5% of the total budget for the year 2026. However, planned outputs, such as a consolidated monitoring report on the 2021–2027 National Gender Equality Strategy, were not delivered.</p> <p>Despite being identified as a “promising” commitment in the IRM Action Plan Review, the lack of strong institutional follow-through, limited civil society engagement, and fragmented implementation meant that it did not generate early results in practice.</p>	
<b>Commitment 13: Public awareness on revenue transparency</b>	
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> No</li> <li>• <b>Potential for results:</b> Unclear</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Early results:</b> No Notable Results</li> </ul>
<p>Commitment 13 aimed to increase transparency and accountability in public financial management, with a focus on property tax collection, adoption of International Public Sector Accounting Standards (IPSAS), and improved asset management practices. Milestones included training sessions with municipalities, adoption of accounting standards aligned with IPSAS, preparation of a methodology for inventorying and valuing public assets, raising awareness among line ministries and local governments on asset management, and ensuring</p>	

that full inventories are recorded in the government’s financial systems.

According to the government’s progress report, implementation was limited across most areas. The Ministry of Finance requested the cooperation of Save the Children Albania and the EU Delegation in Tirana to organize information sessions/workshops under this commitment. These activities were intended to support the General Directorate of Property Tax in conducting trainings with municipal staff and in raising community awareness on the importance of immovable property tax collection for local government units. Furthermore, as part of its legal functions, the General Directorate of Property Tax carried out trainings during March–April 2025 with staff from several municipalities on the use of the Fiscal Cadastre and the importance of immovable property tax collection.<sup>33</sup>

While a concept for IPSAS-based financial statements was prepared in 2023 with input from the World Bank and the Swiss State Secretariat for Economic Affairs (SECO), the updated regulatory framework has not yet been adopted. Similarly, the methodology for asset inventory and valuation is still at the conceptual stage, with no approved or operational framework in place. Progress in migrating fixed assets into the Albanian Government Financial Information System (AGFIS) was limited: only two additional budgetary institutions completed migration during 2023–2024, and one in 2025 (the Ministry of Infrastructure and Energy) bringing the total to 14. There were no reports on awareness-raising on asset management for line ministries and municipalities.

With most milestones either yet to be completed or at a conceptual stage, the commitment has not generated early results for citizens or stakeholders.

**Commitment 14: Public awareness on public finances**

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| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Early results:</b> No Notable Results</li> </ul> |
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Commitment 14 aimed to strengthen education among the public, CSOs, students, academia, and civil servants. Milestones included support to the Ministry of Finance and Economy in drafting the new Public Finance Management (PFM) Strategy and monitoring reports, workshops with CSOs on the Open Budget Survey Albania 2021, fiscal counseling sessions for specific audiences, and training programs for women in business.

Implementation saw limited progress. The most tangible step was the approval of the new PFM Strategy 2023–2030 and its accompanying Action Plan in June 2024.<sup>34</sup> A consultation process was carried out, with civil society actors engaged at early and final stages. While the draft strategy was published on the e-consultation portal in April 2024<sup>35</sup> and a final consultation meeting included CSO representatives. Broader public engagement and regular reporting on monitoring were not evident.

Other milestones, such as workshops with CSOs on the Open Budget Survey or fiscal counseling sessions for SMEs and start-ups, did not take place. The only reported activities were trainings conducted in cooperation with Save the Children Albania and the Ministry of

Finance in two vocational schools in Tirana in late 2023, reaching about 60 high school students. These trainings largely overlapped with those reported under Commitment 12.

As the commitment had a limited level of completion, no notable results were observed in terms of improving public awareness or broadening civic engagement in fiscal policy matters.

**Commitment 15: Increase transparency for public contracts**

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| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Substantial</li> <li>• <b>Early results:</b> Moderate Results</li> </ul> |
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This commitment is assessed in Section II above.

**Commitment 16: Inter-institutional cooperation to improve public services toward entrepreneurship through the creation of a supportive climate for entrepreneurship**

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| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Substantial</li> <li>• <b>Early results:</b> Moderate Results</li> </ul> |
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Commitment 16 aimed to develop an online transparent system for grants to start-ups and facilitators, hosted on the e-Albania platform. Milestones included building the platform, establishing an internal system to receive applications, designing an online evaluation mechanism, and maintaining a database of applicants.

While there was no information on implementation in the government’s progress report, more recent updates from the government confirm a substantial level of completion. The grants platform for start-ups and facilitators was developed and integrated in e-Albania and implementation progressed substantially through the operationalization of the Grant2025 scheme under the legal framework for start-up support (including Decision of the Council of Ministers No. 61/2024). The call for proposals ran from 2 December 2024 to 5 January 2025, with applications submitted through the e-Albania portal. The process included administrative verification by Startup Albania, as well as evaluation and appeals committees established by ministerial decree, and was accompanied by promotion activities in multiple cities and universities, as well as information webinars for applicants. The government reports that 441 applications were submitted during the call, including a targeted “green and digital” window, and that the scheme is backed by a dedicated public allocation for 2025. While its long-term impact on the transparency of grants remains to be assessed in the future, these activities indicate moderate early results.

**Commitment 17: Public awareness, especially socially vulnerable groups, regarding access to comprehensive services**

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| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Early results:</b> No Notable Results</li> </ul> |
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<p><b>lens?</b> No</p> <ul style="list-style-type: none"> <li>• <b>Potential for results:</b> Unclear</li> </ul>	
<p>Commitment 17 aimed to increase access to comprehensive social services, particularly for socially vulnerable groups and people with disabilities, through awareness-raising and promotion of empowerment models.</p> <p>According to the government’s progress report, only one conference was organized in March 2025<sup>36</sup> to promote empowerment models for vulnerable groups, far below the intended outreach. No activities were reported to raise awareness among people with disabilities about access to integrated services. One meeting was held in November 2024,<sup>37</sup> involving 30 children from five municipalities on implementing recommendations from the Committee on the Rights of the Child.</p> <p>With only partial implementation, the commitment did not generate early results.</p>	
<p><b>Commitment 18: Strengthen the capacities of professionals providing services to vulnerable groups</b></p>	
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Early results:</b> No Notable Results</li> </ul>
<p>Commitment 18 aimed to improve professional responses in services for vulnerable groups, especially in cases of violence and protection of children. Milestones included developing and certifying training modules, rolling out trainings nationwide, and building the capacity of local government staff for including women in public hearings.</p> <p>No certified training modules were reported by the national authority (the National Center for Continuous Education), leaving the first milestone unfulfilled. However, according to the government’s progress report, some activities took place: trainings were organized in early and mid-2025 with Coordinated Referral Mechanism members from five municipalities, gender officers, and specialists of the Ministry of Health and Social Welfare. Additionally, a two-day training for the Network of Local Coordinators against Domestic Violence covered all 61 municipalities, supplemented by three local-level meetings. The commitment achieved only limited completion and did not demonstrate notable early results in strengthening capacities at scale.</p>	
<p><b>Commitment 19: Synergies between public institutions and CSOs in monitoring and improving public services</b></p>	
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Early results:</b> No Notable Results</li> </ul>
<p>Commitment 19 sought to strengthen collaboration between the Ministry of Health and civil society in monitoring the effectiveness of services and implementing recommendations from</p>	

international human rights institutions. Milestones included reviewing and coordinating follow-up to recommendations on children’s rights, monitoring the Coordinated Referral Mechanism (CRM) for cases of gender-based violence and trafficking, and assessing specialized support services annually with a unified methodology.

Progress was limited. According to the government’s progress report, the Ministry of Health and Social Protection led the preparation of an Action Plan with 51 recommendations, following the UN’s Committee on the Rights of the Child report for Albania published in September 2023.<sup>38</sup> In September 2024, the National Council for Children’s Rights and Protection approved a plan of measures and introduced the “European Child Guarantee” model,<sup>39</sup> which formally started to be drafted on 1 July 2025.<sup>40</sup> However, no reports were published on the implementation of these recommendations.<sup>41</sup> Similarly, no monitoring reports were produced on the CRM, and the only related activity reported was the Ministry of Health’s collection of information on the National Strategy on Gender Equality. Finally, no activities were reported under the milestone for monitoring specialized support services. No notable results were observed during the assessment.

**Commitment 20: Public awareness on inclusiveness in education**

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| <ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul> | <ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Early results:</b> No Notable Results</li> </ul> |
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Commitment 20 aimed to strengthen inclusiveness in education by raising public awareness and engaging schools, teachers, students, and parents in targeted activities. The milestones included awareness campaigns, national TV programming, local school initiatives, training of teachers, sports inclusion, support for Roma students, and intercultural dialogue.

According to the government’s progress report, some milestones were partially delivered: schools in Elbasan, Gjirokastër, and Mat reviewed and drafted inclusion plans, and the Ministry of Education launched a podcast hosted by the minister.<sup>42</sup> A National Action Plan against bullying and hate speech was also adopted in early 2025, providing a broader policy framework. Limited progress was reported on training, with a teacher training module on inclusive methodologies drafted and piloted mainly in Tirana. Some ad hoc initiatives supported students with disabilities. Roma children benefitted from free textbooks and transport, but no scholarships were reported for them.

Other milestones saw little to no progress. For instance, awareness activities on social media and TV were minimal, parents’ clubs were not established, and the Romani language module was not introduced. Information sessions with parents and teachers occurred sporadically, often without clear documentation. Activities on inclusion through sports were noted in the government progress report but lacked details. The government noted that on the International Day of the Romani Language (5 November) awareness-raising activities were organized, and the Romani language has been taught in two schools in Elbasan within the framework of a community school initiative.<sup>43</sup>

Overall, completion remained limited, and no notable results were achieved.

<p><b>Commitment 21: Public awareness on the impact of digitization of the education system</b></p>	
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> No</li> <li>• <b>Potential for results:</b> Unclear</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Not Started</li> <li>• <b>Early results:</b> No Notable Results</li> </ul>
<p>Commitment 21 aimed to raise public awareness of the impact of digitization in the education system. Its milestones included facilitating Roma minorities’ access to social services through the e-Albania platform and organizing practical lessons in school laboratories to help parents become proficient in using digital platforms.</p> <p>No information is reported in the government progress report on either milestone. Given the unclear potential for results and lack of progress during implementation, no early results were observed.</p>	
<p><b>Commitment 22: Review the National Referral Mechanism</b></p>	
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> No</li> <li>• <b>Potential for results:</b> Unclear</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Complete</li> <li>• <b>Early results:</b> No Notable Results</li> </ul>
<p>Commitment 22 aimed to improve coordination in the protection of victims of trafficking and enhance prevention efforts. Milestones included awareness-raising activities during the Month of the Fight against Human Trafficking, meeting with vulnerable groups, information sessions with pupils and students, and the finalization of a new agreement for the National Referral Mechanism (NRM).</p> <p>According to the government’s progress report, all milestones were completed. There were over 12 district-level meetings with social workers and communities,<sup>44</sup> awareness campaigns targeting vulnerable groups,<sup>45</sup> school activities reaching thousands of pupils and students, campaigns organized by NGOs such as Vatra and Tjetër Vizion, and the creation of mobile units for outreach.<sup>46</sup> International partners, including the OSCE<sup>47</sup> and GIZ,<sup>48</sup> also supported hackathons, conferences, and roundtables.</p> <p>An important institutional milestone was the signing of the new NRM Agreement in June 2023 by 15 state and civil society members,<sup>49</sup> accompanied by the creation of a Task Force and inter-institutional working group that met several times in 2023–2024.</p> <p>The activities largely focused on awareness-raising and formalizing coordination frameworks. The commitment created a structured, multi-stakeholder mechanism that brings together government and civil society in a formal, collaborative framework. However, while valuable for policy coordination and awareness it did not directly improve public access to information, citizen participation, or accountability in anti-trafficking efforts.</p>	
<p><b>Commitment 23: Planning regulatory acts, assessing their impacts, and public</b></p>	

<b>consultations</b>	
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Substantial</li> <li>• <b>Early results:</b> Moderate Results</li> </ul>
This commitment is assessed in Section II above.	
<b>Commitment 24: Open and accessible Parliament</b>	
<ul style="list-style-type: none"> <li>• <b>Verifiable:</b> Yes</li> <li>• <b>Does it have an open government lens?</b> Yes</li> <li>• <b>Potential for results:</b> Modest</li> </ul>	<ul style="list-style-type: none"> <li>• <b>Completion:</b> Limited</li> <li>• <b>Early results:</b> No Notable Results</li> </ul>
<p>Commitment 24 aimed to improve the transparency and accessibility of parliamentary processes through e-legislation tools and better implementation of independent institutions' recommendations. Planned milestones included awareness and training events, updating standard operating procedures (SOPs) and the legal framework, and improving interoperability of legislative systems.</p> <p>According to the government's progress report, several activities were carried out. Twelve trainings were organized for parliamentary staff, five meetings were held with Members of Parliament, and a Memorandum of Understanding was signed with the OSCE Mission to digitize the parliamentary archives for 2013–2023.<sup>50</sup> A task force on e-legislation was also established in 2024 and began work on designing the e-legislation framework. The e-legislation platform<sup>51</sup> was launched in June 2025 as a testing phase.<sup>52</sup></p> <p>Despite these important steps, implementation remained limited. The recently launched e-legislation platform is still in the testing phase and is not interoperable with other systems. The SOPs are not yet updated to fully operationalize e-legislation workflows. The network of line ministry coordinators reported once in 2024 but did not demonstrate sustained activity. Therefore, it is assessed that this commitment achieved no notable results.</p>	

<sup>1</sup> Editorial notes:

1. For commitments that are clustered, the assessment of potential for results and early results is conducted at the cluster level, rather than the individual commitment level.
2. Commitments' short titles may have been edited for brevity. For the complete text of commitments, please see Albania's action plan: <https://www.opengovpartnership.org/documents/albania-action-plan-2023-2025/>
3. For more information on the assessment of the commitments' design, see Albania's Action Plan Review: <https://www.opengovpartnership.org/documents/albania-action-plan-review-2023-2025/>

Information about the level of completion of the listed commitments is from the updated written report on implementation of the OGP Action Plan 2023-2025 for the period March 2023 – May 2025, received by the researcher from the point of contact in June 2025.

<sup>2</sup> General Directorate Against the Corruption, Promotional video on the occasion of the 2<sup>nd</sup> anniversary of its establishment, 25 October 2023, <https://www.facebook.com/share/p/16F9hBmtqg/>

<sup>3</sup> General Directorate Against the Corruption, Monthly Newsletter for November 2023, <https://www.facebook.com/share/p/1BQYSpAe4F/>

<sup>4</sup> See the 2024 annual report (p. 97) at:

<https://antikorrupsioni.gov.al/wp-content/uploads/2025/07/RAPORT-MONITORIMI- -PV-SNKK -2024 -miratar-.pdf>

<sup>5</sup> The role of National Anti-Corruption Coordinator passed to the Minister of State for Public Administration and Anti-Corruption.

<sup>6</sup> See <https://www.drejtesia.gov.al/wp-content/uploads/2024/01/AK-Newsletter-December-2023.pdf>

<sup>7</sup> General Directorate Against the Corruption, Facebook post about the activities “Education against corruption” in the Municipalities of Shkodër and Vlorë, 30 April 2024, <https://www.facebook.com/share/p/14LBmP1tibt/>

<sup>8</sup> The online platform of the Anti-Corruption Network initiated by ALTRI Center, Albanian Helsinki Committee and Friends of Europe, <https://rrietiantikorrupsion.al/>

<sup>9</sup> Anti-Corruption Network, The methodology for measuring public perception on corruption, January 2024, <https://altri.al/wp-content/uploads/2024/09/Draft-Metodologjia-mbi-matjen-e-perceptimit-te-publikut-Version-ne-konsultim-me-MAPA.pdf>

<sup>10</sup> National Anti-Corruption Coordinator, Monitoring Report January – December 2024 (pg.98)

<https://antikorrupsioni.gov.al/wp-content/uploads/2025/07/RAPORT-MONITORIMI- -PV-SNKK -2024 -miratar-.pdf>

<sup>11</sup> Ministry of Justice, Anti-Corruption Vocabulary, July 2023, [https://www.drejtesia.gov.al/wp-content/uploads/2022/12/Fjalori\\_Antikorrupsion\\_AL.pdf](https://www.drejtesia.gov.al/wp-content/uploads/2022/12/Fjalori_Antikorrupsion_AL.pdf)

<sup>12</sup> Institute for Democracy and Meditation (IDM Albania), National Integrity System Assessment Albania 2023,

[https://idmalbania.org/wp-content/uploads/dlm\\_uploads/2024/04/National-Integrity-System-Assessment-Albania-2023-EN-WEB.pdf?fbclid=IwZXh0bgNhZW0CMTAAR2fvTdgaeb-2HVZ2QkzBb80tCXPZ8Tfkq32Y4M6hsLgzLTURHvklfQ7w\\_aem\\_ErazqU72\\_aiUXGUX0vG1Jw](https://idmalbania.org/wp-content/uploads/dlm_uploads/2024/04/National-Integrity-System-Assessment-Albania-2023-EN-WEB.pdf?fbclid=IwZXh0bgNhZW0CMTAAR2fvTdgaeb-2HVZ2QkzBb80tCXPZ8Tfkq32Y4M6hsLgzLTURHvklfQ7w_aem_ErazqU72_aiUXGUX0vG1Jw)

<sup>13</sup> National Business Center, Participation in European Business Registry Association Conference, April 2024, <https://qkb.gov.al/en/ebra-conference/>

<sup>14</sup> National Business Center, Participation in European Business Registry Association Conference, June 2025, <https://qkb.gov.al/site/index.php/ebra-milano/>

<sup>15</sup> Ministry of Justice, Directorate for Free Legal Aid, Facebook post about awareness raising activities during November 2023, <https://www.facebook.com/share/v/1CtakpmcEv/>

<sup>16</sup> Ministry of Justice, Directorate for Free Legal Aid, Facebook post about the meeting in Berat Municipality on Empowerment of women and girls through increased access in economic, legal and social rights, 21 February 2024,

<https://www.facebook.com/share/p/18gqMRbDbD/>

<sup>17</sup> Video in sign language developed by the Albanian National Association of the Deaf (ANAD), published on ANAD Instagram, 24 October 2024, <https://www.instagram.com/reels/DBf9wdosofM/>

<sup>18</sup> Ministry of Justice, Directorate for Free Legal Aid, Manual: How to get Free Legal Aid, May

2024, <https://ndihmajuridike.gov.al/wp-content/uploads/2024/05/PDF-Manual-on-FLA-1.pdf>

<sup>19</sup> Ministry of Justice, Directorate for Free Legal Aid, Facebook post about opening of Free Legal Aid Centers in six municipalities, 31 July 2023, <https://www.facebook.com/watch/?v=252677680903109&rdid=HzJBdrVDkDBSrJQg>

<sup>20</sup> Information provided to the IRM by the Government of Albania during the pre-publication review of this report, 11 December 2025

<sup>21</sup> Information provided to the IRM by the Government of Albania during the pre-publication review of this report, 11 December 2025

<sup>22</sup> Open Data Portal Albania, <https://opendata.gov.al/home>

<sup>23</sup> Information received by the IRM during the pre-publication review of this report, 9 December 2025.

<sup>24</sup> Official Gazette of the Republic of Albania, The Decision of the Council of Ministers No. 472 dated 26.7.2023 for establishing, organization and functioning of the Security Defense Innovation Center, <https://qbz.gov.al/eli/fz/2023/113>

<sup>25</sup> Security Defense Innovation Center, Inauguration of the Security and Defense Innovation Center, 03 April 2024, <https://sdic.gov.al/sq/njoftime/12>

<sup>26</sup> Ministry of Finance, Fiscal Risk Statement for 2023, <https://financa.gov.al/wp-content/uploads/2025/12/Deklarata-e-Risqeve-Fiskale-2023.pdf>

<sup>27</sup> Ministry of Finance, Fiscal Risk Statement for 2024, <https://financa.gov.al/wp-content/uploads/2025/12/Deklarata-e-Risqeve-Fiskale-2024.pdf>

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