

# COMMON REGIONAL MARKET MOBILITY AGREEMENTS:

Their impact on national institutions  
and normative framework



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## Introduction

Regional cooperation in the South East European 6 (SEE6)<sup>1</sup> region has been a complex process marked by both significant advancements and persistent challenges. Emerging from periods of violent conflicts the countries of the region have faced the imperatives of reconciling with the past and forging a collaborative path forward.

EU's involvement in the region, in the framework of EU enlargement process, has elevated regional cooperation to a fundamental precondition for further integration. This cooperation combines cooperation on the societal, economic and political dimensions with different initiatives facilitated by key intergovernmental organisations, the main ones being the [Regional Cooperation Council \(RCC\)](#) and the [Central European Free Trade Agreement \(CEFTA\)](#). Both play a crucial role in facilitating cooperation among the SEE6 countries.

Politically supported by the Berlin Process, with the financial backing of the EU and coordinated by RCC and CEFTA, the [Common Regional Market \(CRM\)](#) aims to enhance economic cooperation, facilitate the alignment with the EU regulations and standards, and ultimately bring the SEE6 region closer to the EU and its Single Market.<sup>2</sup> A variety of agreements exist under the CRM Framework pertaining to one of the six pillars of its Action Plan 2025 - 2028.<sup>3</sup>

Despite these concerted efforts in promoting the four freedoms, regional mobility among citizens within the SEE6 region remains relatively low.<sup>4</sup> Five agreements within the CRM framework aim to particularly address this issue. Their ratification and implementation have presented significant implications and challenges. Notably, the process has been characterised by asymmetrical ratification and implementation<sup>5</sup>, reflecting bilateral issues among certain SEE6 countries. Good governance has also impacted implementation pace, as in all the countries in the region, the implementation phase involves a variety of institutions and depends on a complex array of legal and administrative procedures across various domains.

Understanding and monitoring the implementation of these agreements is of paramount importance, as they are crucial pillars of CRM, vital for economic convergence, enhanced regional cooperation, and alignment with the EU standards and harmonisation with the EU *acquis*. The next sections will provide an assessment of four mobility agreements, focusing on their objectives and the implementation challenges encountered. The analysis delves into the impact on regional and national institutional frameworks, as well as their legal dimension. Finally, we will conclude with a discussion of the main findings and provide recommendations for improvement.

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<sup>1</sup> SEE6 region refers to the geographical area including the countries: Albania, Bosnia and Herzegovina, Kosovo, North Macedonia, Montenegro and Serbia.

<sup>2</sup> Zeneli, S., et al. (2024). Kosovo in the Berlin Process: Addressing Uncertainties and Harnessing Opportunities. Regional Action Lab (Re-ACT Lab) and Friedrich Ebert Stiftung.

<sup>3</sup> See more: CRM Action Plan 2025 - 2028, available here: <https://cefta.int/wp-content/uploads/2024/10/Common-Regional-Market-Action-Plan-2025-2028.pdf>

<sup>4</sup> Caka, F. and Hackaj, A. (2025). The Berlin Process and Open Balkans Initiative: on free movement of citizens. Cooperation and Development Institute (CDI).

<sup>5</sup> Ibid, 2.

## About CRM Mobility Agreements

The five mobility agreements under CRM framework – and signed within the Berlin Process - mark one of the most significant steps in enhancing the regional cooperation among the SEE6, with a concrete impact on the economic convergence and its citizens. Although five mobility agreements have been signed, the last one ([Agreement on Access to Higher Education and Admission to Study in the Western Balkans](#)) has not started implementation yet. For the purpose of this paper, we will only focus on the four agreements, outlined below:

- The Agreement on Recognition of Higher Education Qualifications (MA1)
- The Agreement on Recognition of Professional Qualifications for Doctors of Medicine, Dentists and Architects (MA2)
- The Agreement on Recognition of the Professional Qualification of Nurses, Veterinarians, Pharmacists and Midwives (MA3)
- The Agreement on Freedom of Movement with Identity Cards (MA4)

To date, five of the six countries in the region have fully ratified all four agreements. Bosnia and Herzegovina (BiH) has ratified three, leaving out the Agreement on Freedom of Movement with Identity Cards.<sup>6</sup>

### *i. Recognition of professional qualifications of relevant professions*

The agreements concerning the recognition of professional qualifications of relevant professions (MA2 and MA3) facilitate and simplify the movement of professionals within the region. They aim to reduce the administrative and financial hurdles associated with the process of recognising official documents, as well as harmonise these recognition procedures. By signing and ratifying them, the countries in the region agree to establish *“the rules for automatic recognition of evidence of formal qualifications based on minimum training conditions [..]”*.<sup>7</sup> To do so, the agreements outline a common procedure<sup>8</sup> based on the minimum requirements, as well as the necessary supporting documents required to be submitted to the relevant authorities in each country where a person wants to practice their profession (included in the agreement).<sup>9</sup>

The implementation of these agreements is facilitated and supervised by the Joint Working Group on Recognition of Professional Qualifications (JWGRPQ)<sup>10</sup>. The implementation of agreements requires countries in the region to enact the necessary laws, regulations and administrative provisions at least eighteen months from the entry into force of these agreements.<sup>11</sup>

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<sup>6</sup> CDI (2024) CRM Update. Available here: <https://cdiinstitute.eu/2024/12/14/crm-update-north-macedonia-2/> (Last accessed April 18, 2025).

<sup>7</sup> Article 1. Agreements on the Recognition of Professional Qualifications (both agreements).

<sup>8</sup> Ibid. Article. 9.

<sup>9</sup> Ibid. Article 11.

<sup>10</sup> Ibid. Article 16.

<sup>11</sup> Ibid. Article 19.

## *ii. Recognition of higher education qualifications*

The agreement on recognition of higher education qualifications (MA1) establishes common rules and procedures for recognition of higher education qualifications.<sup>12</sup> Most importantly, it eliminates additional costs associated with the recognition of diplomas from other countries, and reduces the processing time to 14 days.<sup>13</sup> This agreement also enables the mobility of both students and academic staff in the region, aligning with the Lisbon Convention on Recognition, the Bologna Process and other EU rules pertaining to this topic. Initially applicable only to public universities, the agreement is intended to expand to include private accredited institutions as well.<sup>14</sup>

The implementation of the agreement is organised, coordinated and monitored by the Joint Commission on Recognition of Higher Education Qualifications (JCHEQ). According to the agreement, SEE6 countries are required to submit a list of accredited Higher Education Institutions (HEIs) to the JCRHEQ<sup>15</sup>, which will be further used to coordinate the process of recognition of the qualifications. Furthermore, any changes to these lists proposed by any SEE6 country need to be reviewed and approved by the JCHEQ.<sup>16</sup>

## *iii. Free movement with ID cards*

The agreement on free movement with ID cards (MA4) eliminates short-stay mobility barriers within the region, allowing citizens to move freely only with their ID cards.<sup>17</sup> A Commission is established to organise, coordinate and monitor the implementation of this agreement.<sup>18</sup> The agreement foresees that all countries in the region exchange specimens of identity cards<sup>19</sup> in order for them to be electronically readable in each country. Beyond the citizens' benefits from this agreement, an appreciation for the agreement was expressed by the business community in the region, where 57% of them believe that the ability to travel across the region with an ID card could be beneficial for their business as well.<sup>20</sup>

This agreement is particularly important for Kosovo and BiH, as the only two countries in the region with visa regimes in place. This visa regime was unilaterally abolished from the side of Kosovo when this agreement was ratified in 2024; however, BiH continues to maintain its visa regime for Kosovo citizens.

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<sup>12</sup> RCC Factsheet. [Common Regional Market - Mobility Agreements](#).

<sup>13</sup> The Agreement on Recognition of Higher Education Qualifications. Article 5.

<sup>14</sup> Ibid. Article 12.

<sup>15</sup> Ibid. Article 8(1).

<sup>16</sup> Ibid. Article 10.

<sup>17</sup> The Agreement on Freedom of Movement with Identity Cards in the Western Balkans. Article 3(1).

<sup>18</sup> Ibid. Article 8.

<sup>19</sup> Ibid. Article 6.

<sup>20</sup> Regional Cooperation Council (2022). [Balkan Barometer 2024 \(Infographic\) - Business Opinions](#). P30.

## Challenges with CRM Agreements

Ratification and implementation of those agreements has met several challenges.<sup>21</sup> BiH has yet to ratify the agreement on free movement with IDs. Similarly, the functioning of some Joint Committees often reflects ongoing bilateral tensions. For example, the agreement on recognition of higher education qualifications is strained by the bilateral issues among Serbia and Kosovo concerning the recognition of Kosovar public institutions and their qualifications by the Serbian authorities.

Consequently, the implementation of the agreements has been marked by asymmetric ratification dynamics and implementation hurdles.<sup>22</sup> Due to differences regarding the ratification progress, some countries have already begun the implementation of the agreements, while others lagged behind. Furthermore, even the ones who were on time with the ratification sometimes experienced delays in providing necessary documentation for the Joint Committees (e.g. not all countries submitted the list of universities for the recognition of academic qualifications). Although, the principle of national sovereignty stipulates that countries cannot be forced into ratifying any agreements, it is crucial for them to uphold their regional commitments, especially when such commitments are established through mutual negotiations and cooperation procedures - like in the case of the Action Plans of CRM which is developed and approved in close consultations with SEE6 governments.

Other challenges that directly impacted the implementation have been flagged. For example, frequent elections in different economies in the region lead to changes in the respective institutions in charge. Often this results in changing representatives in working groups and joining commissions, delaying the process of decision-making and creating inconsistent participation.<sup>23</sup> Additionally, the capacities to respond to parallel processes and workload of public administrations also impact the implementation. For example, the EU Growth Plan (GP), has added parallel streams of work in regard to the economic integration priorities and focus of public administrations to the preparation of the reforms planned under the Reform and Growth Facility, therefore, impacting human resources dedicated to the implementation of respective regional agendas.<sup>24</sup>

Another challenge impacting the effective implementation of such agreements and indeed broader regional cooperation within the SEE6 is a deficit of political will and genuine commitment. While declaratory actions are always present among the public speeches of SEE6 leaders, substantive political action and sustained dedication to advancing these agreements do not always follow.<sup>25</sup> This disconnection between rhetoric and reality undermines the progress and potential benefits coming out of these agreements, or in this case, the CRM framework.

The signing of the CEFTA agreements - blocked at the Joint Committee level - has been often attributed to technicalities, but in reality, was heavily influenced by political factors.

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<sup>21</sup> European Commission (EC) (2024). [Communication on EU Enlargement Policy](#); [EC Country Reports for WB6](#).

<sup>22</sup> Ibid, 2.

<sup>23</sup> CDI (2025). Interview with Ms. Kastrati, Acting Head of Programme Department at RCC.

<sup>24</sup> Ibid.

<sup>25</sup> Ibid, 2.

These issues were resolved during the 2024 Berlin Process summit with the support and facilitation of the German Special Representative for Western Balkans, where an agreement to amend the Rules of Procedures at CEFTA was signed.<sup>26</sup> In this summit, [Kosovo agreed](#) to lift the import ban on Serbia in exchange for security scanners for border checks of goods.

When discussing these blockages, it is worth noting the complex environment in which both CEFTA and RCC operate. Being intergovernmental organisations, their work is directed and their decision-making process relies completely on the consensus of member countries.<sup>27</sup> Although their secretariat coordinates the day-to-day operations, they lack any means to assert any decisions or measures towards non-compliance, making it difficult to ensure the timely and efficient implementation of the agreements, especially the overall CRM.

A similar logic of decision-making dynamic applies to the Joint Working Groups/Joint Committee of the mobility agreements. These bodies, composed of government appointees, are subject to national political influences. Disagreement can lead to blockages, causing implementation delays or resulting in asymmetrical implementation where agreements are applied selectively among countries. This ultimately leads to uneven regional cooperation and convergence.

## Main impact of the agreements

Discussions surrounding these agreements often emphasise their direct impact on citizens, their associated benefits and regional economic development. While this impact is crucial, it is important to note that the scope of these agreements extends beyond these immediate effects. As previously noted, their implementation necessitates the involvement of various institutions responsible for specific aspects, and their transposition into national systems requires changes to laws, regulations and administrative procedures. More importantly, their adoption and implementation transform good governance practices of SEE6 institutions involved shifting them towards EU good governance standards and practises.

In this section, we will focus on addressing the impact of these agreements on two areas: (i) the SEE6 institutional framework, and (ii) the legal and administrative changes resulting from their implementation.

## Institutional Framework

The institutional framework responsible for the implementation of these agreements operates at the regional and at SEE6 national level. It is to be noted that there is no Member State (MS) or EU level in the governance of CRM agreements. This absence

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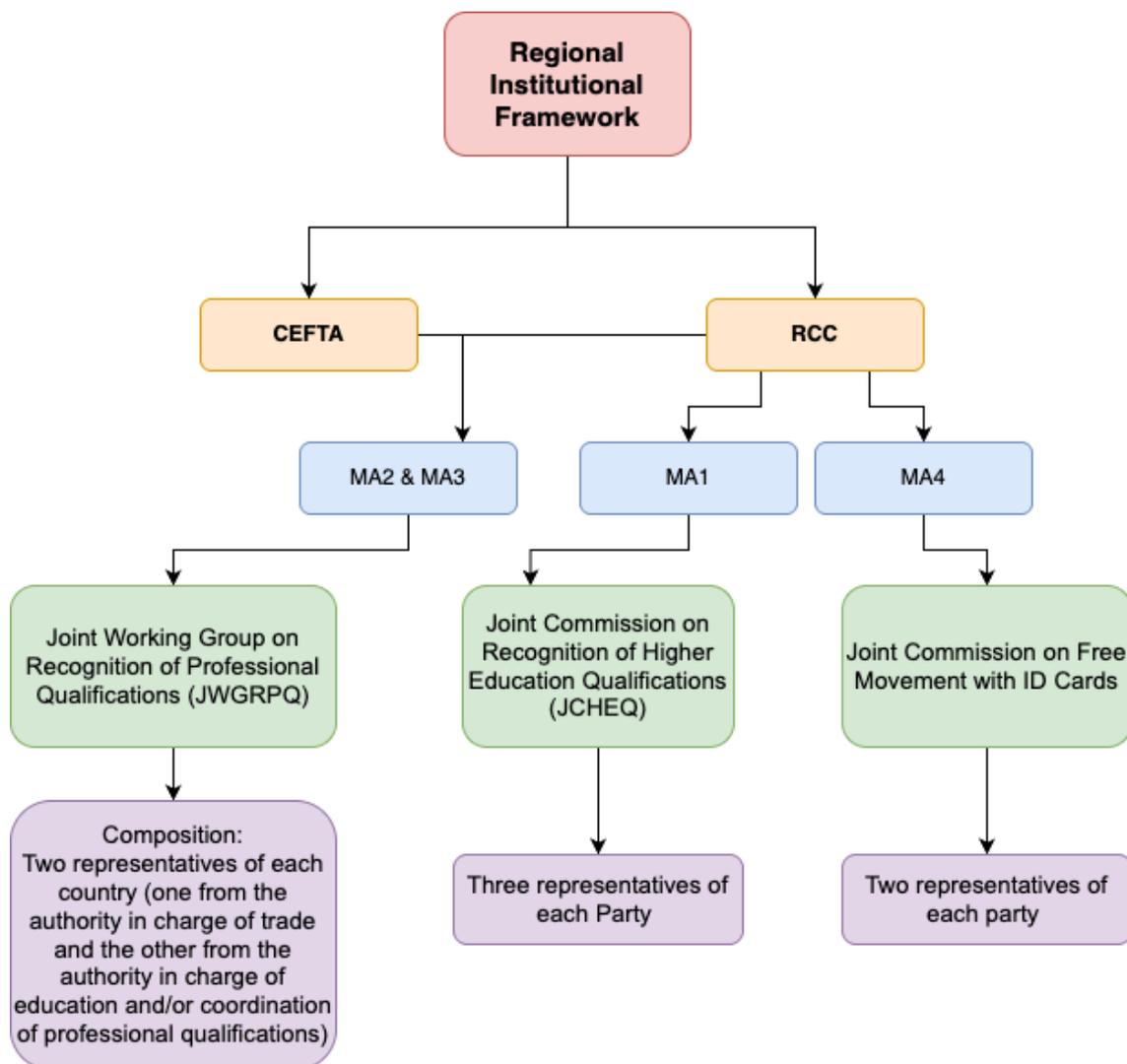
<sup>26</sup> Decision of the Joint Committee of CEFTA No.1/2024. [Annex 1 to Decision No.1/2024](#)

<sup>27</sup> RCC Statute, Section V-15 (f); CEFTA Agreement Art. 41(2).

directly nullifies any agency that a certain MS or the EU may want to exercise in the process.

The regional framework is less complex, organised as follows:

Diagram 1: Regional Institutional Framework



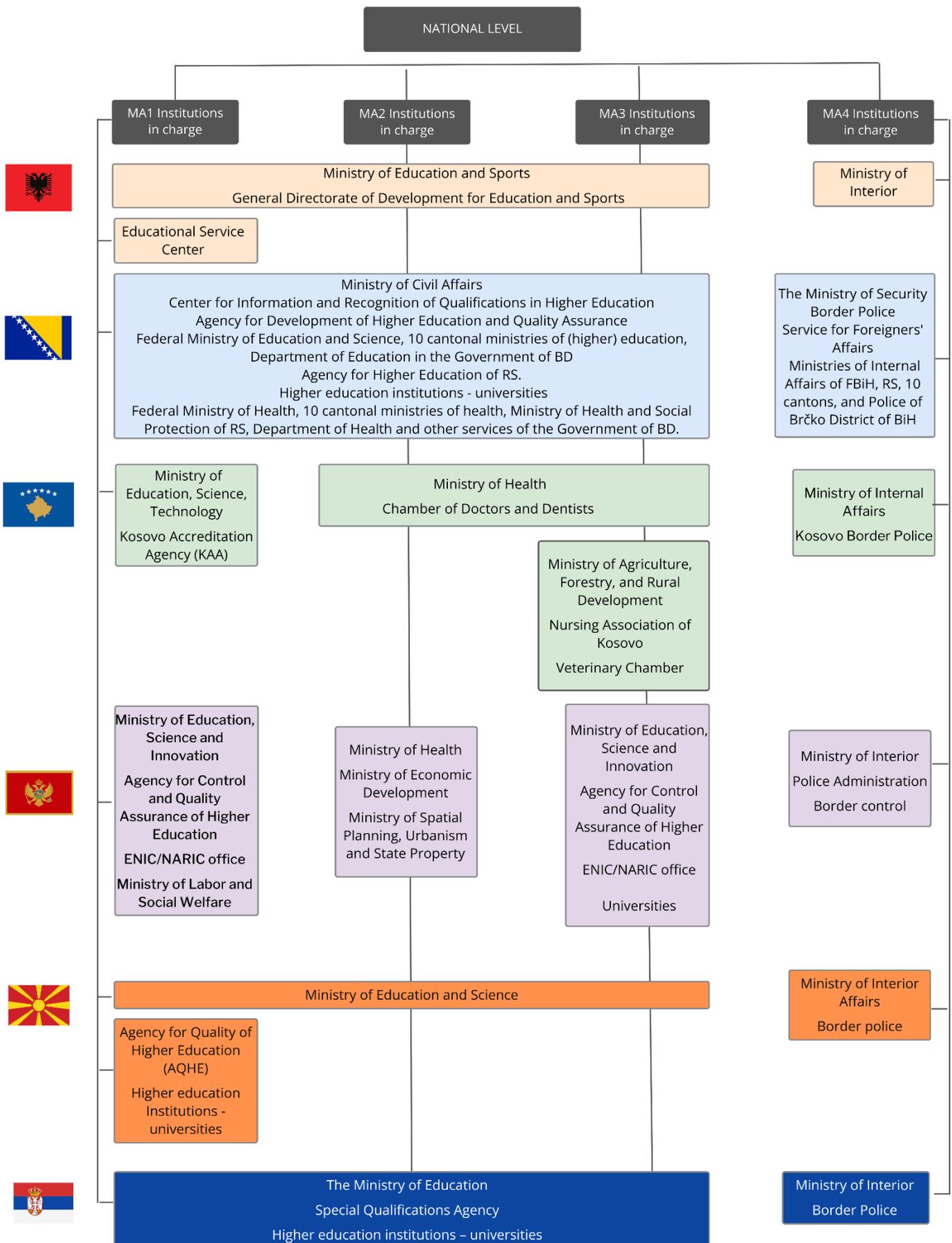
RCC and CEFTA jointly coordinate the MA2 and MA3, while RCC solely coordinates and facilitates the MA1 and MA4.<sup>28</sup> As part of this coordination, each Joint Working Group and Commission is expected to develop and approve its rules of procedure (RoP). The Joint Commission on Free Movement with ID cards approved its RoP on July 2024 and JCHEQ approved theirs in September 2024. The JWGRPQ is expected to finalise its RoP soon. Currently, only the JWGRPQ’s Terms of Reference, published within the CEFTA Joint Commission decisions in 2024<sup>29</sup>, is publicly available. As JWGRPQ operates within the CEFTA framework, it adheres to CEFTA’s procedures and approval processes.

<sup>28</sup> Ibid, 23.

<sup>29</sup> Ibid, 26.

In contrast to the relatively simple regional framework, the implementation of these agreements at the national level is more complex. This complexity arises due to the involvement of numerous institutions, each responsible for specific aspects of implementation. Such complexity requires a high level of coordination and cooperation. It is worth noting that the composition of institutions involved in this process varies across the SEE6 countries, reflecting their distinct governance structures. This institutional framework at the national level is organised as follows:

Diagram 2: National Institutional Framework



### a) *Coordination Mechanisms*

Similar to the institutional variations, each country has different mechanisms for the coordination of these agreements at the national level. In **Serbia**, the Ministry of European Integration (MEI) has a leading role in the overall coordination of regional processes, including inter-institutional activities and representing Serbia in CRM related discussions. Currently, there is no dedicated contact point for CRM coordination, though such a position is typically situated within the MEI or the Office of the Prime Minister.

In **Montenegro**, the implementation is coordinated through a formal body established under the Berlin Process framework, known as the *Working Team for Coordination Activities within the Berlin Process*.<sup>30</sup> The team ensures that institutional efforts are aligned, monitored and reported in line with national and regional commitments. Comprising over 60 members, from key ministries, agencies, the chamber of commerce and parliament, the team meets annually and it functions under the purview and coordination of the Foreign Policy Advisor to the Prime Minister of Montenegro.

**Kosovo** also lacks a dedicated coordination mechanism for the implementation of these agreements. Coordination is distributed within the broader framework of regional cooperation and European integration. While various institutions are involved, the Office of the Prime Minister plays a central role in the overall implementation of CRM. The Special Advisor to the Prime Minister (Sherpa), acting as a National Coordinator for the Berlin Process, provides strategic and political oversight to the CRM related processes, including the mobility agreements (See Table 2). Other line ministries are engaged with the implementation of the particular agreements. The Ministry of Foreign Affairs and Diaspora also plays a coordinating role, but their efforts tend to be ad hoc within the overall process.

In **Bosnia and Herzegovina**, the implementation of the mobility agreements is less complex, with fewer institutions involved. The coordination of the implementation of the agreements (excluding MA4, which is not ratified) is carried out by the Ministry of Civil Affairs. The implementation is further supported by the Centre for Information and Recognition of Qualifications in Higher Education (CIR).

In **Albania**, the coordination of the implementation of the mobility agreements is steered mainly by the Sherpa, within the Prime Minister's Office. Among other things, Sherpa facilitates cross-ministerial communication and ensures domestic follow-up on regional commitments. Specific line ministries are designated as responsible for the implementation of particular agreements (see Table 2). Beyond these lead ministries, other key institutions are involved in the practical implementation, such as the Ministry for Europe and Foreign Affairs, Border and Migration Police, National Agency for Vocational Education and Training and Qualifications, the National Agency for Employment and Skills, Educational Service Centre, Quality Assurance Agency in Higher Education, Diploma Recognition Commission, etc.

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<sup>30</sup> Read more here: [Official Government Decision](#) (24 December 2024).

In **North Macedonia**, coordination is mainly under the auspices of the executive government, and with line ministries tasked with the implementation of respective agreements and aspects based on their legal scope of work. A central coordinating role is held by the Sherpa, who is the Director of the Directorate for the European Union within the Ministry of Foreign Affairs and Foreign Trade.

The coordination of the mobility agreements varies across the SEE6 countries. Serbia and Montenegro have established formal mechanisms, albeit with different structures and levels of centralised coordination. Kosovo relies on existing frameworks for European integration with a strong role for the Office of the Prime Minister, while BiH employs a more streamlined approach through its Ministry of Civil Affairs. Albania and North Macedonia also rely on the Sherpa-led model for coordination, with Albania's Sherpa positioned as an advisor to the office of the Prime Minister and North Macedonia's Sherpa situated within the Ministry of Foreign Affairs.

The commonality is that the coordination responsibilities are anchored within the high-level governmental structure, such as specific ministries or offices closely linked to the prime minister, indicating the political importance of these agreements. However, there are contrasting practices in the degree of formalisation of the process of coordination. While others have a more or less similar coordination process, Montenegro stands out with its large, cross-sectoral working team (although mainly for the Berlin Process), which directly touches on the coordination and implementation of these agreements. Although countries are free to choose the coordination mechanisms, it is worth noting that such structural variations likely will also impact the consistency of implementation and overall national actions towards harmonisation efforts.

#### *b) Implementation Challenges and Administrative Capacity*

Institutional capacities and administrative burdens are significant challenges impacting the national implementation of these agreements. In **Kosovo**, key coordinating bodies suffer from insufficient staff and resources, exacerbated by the absence of a formal coordination mechanism. These issues lead to a reliance on ad-hoc arrangements and significant administrative burdens in adapting procedures, and result in slow, fragmented processes. Monitoring of the agreements remains a challenge due to the lack of a centralised system to track the implementation.

**Montenegro's** administration also suffers from different structural issues, including shortages of qualified personnel, frequent staff turnover, and insufficient targeted training. These issues limit administrative capacity. Additionally, the lack of a unified approach, as well as proper communication channels among ministries and agencies, has led to inconsistencies and delays with the CRM implementation. Although the Working Team in charge of the coordination of these agreements has contributed to addressing the main weaknesses, many issues persist.

Administrative capacities are also a challenge in **Serbia**. Limited specialisation and training of public administration, coupled with poor coordination between institutions and the lack of standardised procedures, heavily impact the effective implementation of

these agreements. In comparison, **Bosnia and Herzegovina** shows a different picture. According to the 2024 Annual Report of the CIR, no major challenges were encountered in the process of the implementation of the agreements. A primary operational challenge reported was the management of a high volume of requests from various authorities; however, these were reportedly resolved in a timely manner. According to this, the administrative burden in BiH with regard to the implementation of the agreements seems to be mainly operational rather than systemic capacity shortages.

**Albania** also faces systemic challenges, common in the region, that affect the implementation of the agreements. The analysis of public administration in the country shows a gap between the well-developed legal framework and the effective implementation on the ground.<sup>31</sup> Key challenges include the lack of institutional capacity and politicised bureaucracy. While Albania is making progress to address these challenges, they are still persistent and have a direct impact on the implementation of the mobility agreements.

In **North Macedonia**, the implementation challenges vary depending on the agreement. The MA4 is considered the most advanced and is being implemented without any visible issues, primarily because NM has already allowed such travel with other countries in the region prior to the agreement. In contrast, for the MA2 and MA3, there is no publicly available information to confirm exactly their implementation challenges at the national level, or confirm the start of their implementation. Consequently, administrative capacities are an issue, especially when the implementation starts. The main concern is the large workload for the small number of staff assigned to the implementation of the agreements.

Administrative challenges are well-recognised across the region. Capacity limitations and administrative burdens remain significant obstacles in all countries, particularly concerning their ability to implement EU accession reforms.

### *c) Engagement of CSOs and other associations*

The engagement of different stakeholders (CSOs, professional associations and other non-governmental bodies) in the implementation process appears to be limited across the region. In **Montenegro**, the involvement of these groups is limited and mainly consultative in nature. Sectoral bodies such as the Chamber of Commerce or professional chambers often participate in public consultations of draft laws, but their engagement is limited as the process progresses. In **Kosovo**, while the engagement of these groups is regulated formally by the regulations in place for the drafting of strategic and legislative documents<sup>32</sup>, the resulting input remains small. Similarly, in **Serbia**, NGOs are offered minimal opportunities for contributing to the monitoring and implementation of these agreements. In **North Macedonia**, information regarding the involvement of CSOs in the implementation and monitoring of the agreement was not available, leading us to believe that their involvement is very limited.

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<sup>31</sup> European Commission (2023). [Albania Report 2023](#).

<sup>32</sup> Regulated by Rules of Procedure of the Government of Kosovo (Regulation No. 17/2024) and Strategy for Public Administration Reform (SRAP) 2022 – 2027.

In **Bosnia and Herzegovina**, the engagement of CSOs and professional associations in the implementation of these agreements also appears to be limited and consultative in nature. For example, the most recent (November 2024) event was organised by the Ministry of Civil Affairs in BiH and the CIR, gathering relevant stakeholders and aiming to raise awareness of BiH's obligations under the CRM Action Plan, the implementation of EU Directives on regulated professions, and the ratified mobility agreements. However, no opportunities for meaningful involvement in the implementation and monitoring are provided to these groups. Despite mandatory legal consultations for new laws and regulations in **Albania**, the actual engagement of CSOs and other associations in the implementation process of these agreements is largely confined to a limited, consultative role, mirroring the broader regional trend.

In general, throughout the region, although stakeholder groups are given occasional consultation opportunities, they are, by design, not systematically involved in the implementation phase of mobility agreements, which are mostly treated as intergovernmental matters. A formal and systemic mechanism for the ongoing involvement of these non-governmental groups in CRM implementation is needed at the local and regional level. The lack of such mechanisms leaves a gap in transparency, accountability and practical feedback from those most affected by the agreements.

At the regional level, RCC and CEFTA sometimes provide consultation opportunities to CSOs, such as the consultation of the new CRM Action Plan (2025 - 2028) last year, which was carried out by CDI in cooperation with the RCC. However, these consultations are typically done on an ad-hoc basis rather than coming as a result of a legal obligation to involve CSOs. Beyond consultations, CSO engagement in implementation, monitoring and evaluation remains limited. A more meaningful and formalised engagement of CSOs in all phases of implementation could be ensured as part of CEFTA, based on the EU standards, by establishing the Domestic Advisory Groups (DAG).<sup>33</sup>

## Legal and Administrative

Implementing CRM mobility agreements necessitates significant legal and administrative adjustments in each country. All countries - except BiH, which did not ratify MA4 - have formally incorporated the agreements in their domestic legal system through their ratification<sup>34</sup> or adoption. By doing so, SEE6 countries are harmonising their legal systems with the EU in the respective sectors, as exemplified by the alignment of professional qualifications with the EU directives (2005/36/EC, 2013/55/EU). While the harmonisation with the EU standards is crucial, the primary issue remains the process of fully harmonising the national legislation with the respective agreements. Particularly, the drafting of by-laws, the establishment of effective administrative procedures and ensuring consistent compliance remain ongoing challenges for all countries in the region.

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<sup>33</sup> See more: Zeneli, S. (2024) [Unblocking CEFTA: The Necessity for Reforms to Enable Economic Cooperation and Development in WB6](#). Re-ACT Lab.

<sup>34</sup> Except Albania where they enter in force through adoption by decision of the Council of Ministers

The full enactment of legal and administrative procedures to support the implementation of the agreements is still pending, notwithstanding ongoing regional efforts. The MA4 is operational, allowing travel across the SEE6 region, with the exception of BiH due to their non-ratification of the agreement. The MA2 and MA3 are currently under implementation at the regional level.<sup>35</sup> The JWGRPQ is discussing the alignment with the list of minimum training conditions for the respective professions covered by the agreements with the objective of achieving full alignment with the EU directive on the recognition of professional qualifications.<sup>36</sup>

Additionally, CEFTA is developing the online database of recognised professions, mirroring the same approach applied in the EU.<sup>37</sup> At this stage, alignment with the EU Directive on professional qualification is still in progress.<sup>38</sup> Despite the stipulated 18-month timeframe for aligning national regulations, progress has been somewhat limited.

For instance, **Kosovo** has issued new or amended administrative instructions in the health sector in order to operationalise the agreements for medical professionals. More concretely, administrative instruction (GRK) No. 10/2022 regarding the licensing of foreign health professionals was amended in January 2024, entering into force as the administrative instruction (GRK) No. 10/2023.<sup>39</sup> Under Article 7<sup>40</sup>, this administrative instruction directly explains the process of recognising foreign qualifications of health professionals and makes reference to the relevant mobility agreements. The only part of the administrative instruction which needs to be further harmonised with the agreements is the issue of the knowledge of the language.<sup>41</sup> With regards to medical professions, Kosovo is also currently in the process of amending the administrative instruction (MH) No. 01/2023<sup>42</sup> regarding the specialisation level. As part of this administrative instruction Kosovo is harmonising the timeframe for completing the specialisation studies to the timeframes applied in the EU<sup>43</sup>, therefore also aligning with the relevant mobility agreements.

Furthermore, in response to the needs of recognition of foreign architecture professionals, Kosovo has set up the Chamber of Architects of the Republic of Kosovo, which handles licensing and recognition of foreign licenses in the field.<sup>44</sup> The assembly of the chamber has also approved the criteria and procedure for the recognition of foreign licenses of architects.<sup>45</sup>

Similarly, **Montenegro** is also progressing with the harmonisation process. The country has enacted the Law on the Recognition of Professional Qualifications in December 2023,

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<sup>35</sup> Travel with ID in the region was allowed before as well due to many bilateral agreements.

<sup>36</sup> Ibid, 23.

<sup>37</sup> Ibid.

<sup>38</sup> Ibid.

<sup>39</sup> Email Communication with the Prime Minister Office in Kosovo, 23rd of May 2025.

<sup>40</sup> [Administrative Instruction \(Grk\) No. 10/2023 For The Licensing Of Foreign Health Professionals](#). Official Gazette of Republic of Kosovo.

<sup>41</sup> Ibid, 42.

<sup>42</sup> [Administrative Instruction \(Health\) No 01 /2023 Specialist Education](#). Official Gazette of Republic of Kosovo.

<sup>43</sup> Ibid, 42.

<sup>44</sup> Ibid, 42.

<sup>45</sup> [Regulation on the Criteria and the Procedure for Recognising the Licenses of Foreign Architect Professionals](#). Chamber of Architects of the Republic of Kosovo

and the law is directly linked to the obligations of MA1.<sup>46</sup> In the case of **North Macedonia**, the relevant laws touching these agreements have not been amended yet. A legislative process for a new Law on the Recognition of Professional Qualifications has been initiated but stopped in 2018, well before the mobility agreements were signed. The lack of progress with these laws is constantly emphasised by the EC country report. To date, only the new Law on the National Qualifications Framework has been recently adopted with the aim of aligning with the European Qualifications Framework.

**BiH** continues its harmonisation efforts, though public information on concrete steps remains limited. CIR has produced a Roadmap for the Implementation of the EU Directive on Regulated Professions 2005/36/EC. Although the directive is not directly linked to the MAs, it is closely connected as it regulates the professional qualifications to the EU standards, thereby the aims of the MA2 and M3. Complementing this, CIR is also developing a national qualifications framework to facilitate the implementation of these agreements. Similarly, **Albania** is also in the process of harmonising its national legal system to align with the EU directives and regional agreements, but public information is limited. Despite the current absence of identified legal or administrative changes, the Ministry of Education and Sports, with GIZ's assistance, is drafting the Law on the Recognition of Professional Qualifications (for 7 professions), expected to be enacted soon and contribute to the implementation of the MA agreements.

Meanwhile, the MA1 remains blocked at the regional level, preventing any implementation steps at the national level. This blockage stems from persistent bilateral issues between Serbia and Kosovo, specifically regarding Serbia's recognition of few higher education institutions in Kosovo. The central point of contention involves the University of Pristina in North Mitrovica and the Leposavic Institute, which are also included in the list of higher education institutions of Serbia. Consequently, this blockage effectively halts any progress in the implementation at the national level, as well as affects the partial application of this MA between Kosovo or Serbia with the other SEE6 partners.

While the CRM mobility agreements are legally enshrined through ratification in the SEE6 countries, effective implementation of the agreements at the national level requires specific steps to be followed. As long as the above-mentioned challenges continue to be present, the true benefits of these agreements remain unrealised.

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<sup>46</sup> [Law on Ratification of the Agreement on the Recognition of Qualifications in the Field of Higher Education in the Western Balkans](#). Official Gazette of Republic of Montenegro.

## Conclusions

The mobility agreements hold immense potential for fostering regional cooperation and economic integration of SEE6, all by aligning them with broader EU aspirations. These agreements are vital for achieving the goals of the CRM, even if their successful implementation is impacted by a complex interplay of challenges.

Asymmetrical ratification and implementation across the region have created an uneven landscape. While five out of six countries have ratified all agreements, BiH's failure to ratify the MA4, has created a significant barrier to full regional implementation. Furthermore, the persistent bilateral disputes, particularly between Serbia and Kosovo concerning the recognition of higher education institutions, have directly stalled the progress of the MA1. The spill-over effects are significant, impacting the effectiveness of joint working groups and joint commissions, and delaying vital decisions for the implementation of the agreements.

Administrative capacity constraints within national administrations across the SEE6 region also pose a challenge. Issues such as staffing shortages, frequent staff turnover, insufficient specialised training and limited financial resources impact the implementation of the agreements. This lack of capacity has been further strained by recent developments and priorities, such as the EU Growth Plan, which has diverted administrative focus and resources toward reforms planned under the growth plan. The complexity of national institutional frameworks, involving numerous ministries and agencies, with complex coordination processes, adds another layer of difficulty for all countries in the region.

Lack of political will and commitment to follow the signature with swift implementation measures still remains a challenge for some countries. Despite declaratory actions and public speeches emphasising the importance of regional cooperation, substantive political action and sustained dedication to advancing the agreements have sometimes been lacking. This disconnection between rhetoric and reality undermines progress and reinforces scepticism among stakeholders. Furthermore, the complexity of institutional coordination at the regional level contributes to the challenges in implementation and potential blockages, as decisions require consensus among parties and are often subject to national political influences, leading to disagreements, delays and blockages of the implementation. While efforts for legal harmonisation are underway, the establishment of robust administrative procedures and ensuring consistent compliance with the agreements remains a critical but challenging task.

Finally, the governance framework provides only a limited - if none at all - engagement for CSOs and other stakeholders, leaving a gap in transparency and accountability. While some countries offer occasional consultations, a formal and systematic mechanism for their ongoing involvement is absent. The ad-hoc consultations currently offered by RCC and CEFTA are insufficient and do not ensure meaningful participation in the implementation, monitoring and evaluation phases.

To fully unlock the transformative potential of these agreements, the SEE6 countries must address these challenges through sustained political dialogue to resolve bilateral disputes, substantial capacity building within national administrations, and a genuine commitment to regional cooperation beyond just declaratory actions. Additionally, adopting a more inclusive approach to stakeholder engagement, potentially through formal structures like DAGs within CEFTA, is crucial for fostering transparency, accountability and broader societal support for these agreements and those in future.

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