

## **Annex I to the Commission Implementing Decision approving the third release of funds to Albania under the Reform and Growth Facility for the Western Balkans**

### **Assessment of the Conditions for Payments – Albania**

#### **1. European Commission assessment of the preconditions for Union support**

##### ***Effective democratic and rule of law mechanisms***

Albania has a multi-party parliamentary system, and the electoral framework allows for generally free and fair elections, though additional progress is needed to address outstanding Office for Democratic Institutions and Human Rights (ODIHR) recommendations. Following the parliamentary elections held in May 2025, the final conclusions of the Organization for Security and Co-operation in Europe (OSCE)/ODIHR Election Observation Mission note that elections were competitive and professionally conducted, though they took place in a highly polarised environment and the contestants did not enjoy a level playing field. Parliament exercises its powers in a partially effective way, as political polarisation, a lack of genuine political dialogue and continuous clashes between the ruling majority and opposition affect its activities, and it has limited oversight over the executive. The Constitutional Court of Albania has been effective in upholding institutional checks and balances, though the Parliament has failed to comply with some of its rulings within the applicable deadline. While public consultations have been carried out, their limited effectiveness continues to affect the quality of the legislative process. The environment for civil society organisations remains challenging, including in relation to registration requirements and limited public funding.

Albania continues to implement the justice reform adopted in 2016, which led to significant improvements in the functioning of the judiciary and quality of judicial review. The current legal and institutional judicial framework ensures strong independence and guarantees impartiality. It has maintained the separation between the executive and legislative powers and the judiciary. While attempts by public officials or politicians to exert undue interference and pressure have increased, challenging the independence of the judiciary, the track record on cases of high-level corruption demonstrates the system's resilience. Independent procedures are in place to appoint, promote, evaluate and dismiss judges and prosecutors, and ensure the right to appeal against related decisions. The vetting process at appeals level has also advanced and is close to finalisation. Further improvements to the quality and efficiency of justice are still needed. The track record against corruption and organised crime continues to improve for high-level cases but further improvements are needed to deal with other cases such as petty corruption.

##### ***Respect for all human rights obligations***

Albania is a party to the main international human rights instruments, though the country is yet to sign the Optional Protocol to the International Convention on Economic, Social and Cultural Rights. It also needs to develop a comprehensive monitoring and data collection system to assess the level of implementation of human rights legislation, policies, and strategies.

Albania's legal framework provides a good basis for the protection of fundamental rights, although further strengthening of its implementation remains necessary. Effective implementation of laws and by-laws is key, notably in the areas of violence against women, protection of rights of persons belonging to minorities, protection of personal data and of

property rights (reforms related to the latter are foreseen in Albania's Reform Agenda). The adoption of the Gender Equality Law on 6 November 2025, was an important milestone in Albania's alignment with relevant EU *acquis* and international standards. Effective implementation of the newly adopted legislative changes requires the allocation of sufficient administrative and budgetary resources. Albania also needs to make decisive progress on the implementation of the National Agenda on Child Rights and better protect children at risk, by securing relevant budget and capacities.

Further reforms are needed to strengthen freedom of expression, including media freedom and to regulate online media. This is a cornerstone of Cluster 1 negotiations. Positive developments in this field include the adoption of amendments to the law on audiovisual media related to media ownership transparency, launch of a structured dialogue – the Media Open Dialogue Platform (PlatFORMedia) between the Albanian institutions and the media actors, adoption of soft measures on journalists' safety and amended criminal provisions on defamation aiming to protect registered journalists. Further reforms in this area are required including full decriminalisation of defamation, and a broad reform of the media sector to strengthen media ownership transparency, media plurality and editorial independence, transparency of media financing, autonomy of the media regulator and independence of the state broadcaster, and the protection and safety of journalists and media professionals.

**The preconditions are confirmed as met.**

## **2. European Commission assessment of the general conditions for payments**

### **a) Assessment of the macro financial stability**

The **real sector** in Albania demonstrated continued resilience in 2025, though growth decelerated from the robust 4% achieved in 2023–2024 to approximately 3.6% for the first three quarters of 2025, with Q3 recording 3.75%. The European Commission and IMF project growth to continue at 3.5%–3.6% for 2025–2026. Growth was primarily driven by the services sector, particularly tourism, and construction. However, both agriculture and industry registered contractions. Service exports exhibited robust annual growth of 17.7% in Q3-2025, while goods exports contracted significantly by 13.4% during the same period. Labour market conditions improved substantially, with the employment rate reaching 69.6% for the 15–64 age group and unemployment declining to 9% in Q3-2025. Private sector wages rose 9.6% during the first nine months of 2025. Average inflation remained stable at 2.2% in 2025. Albania targets a fiscal deficit of 2.3% of GDP in 2026, with public debt declining to 53.6% of GDP from 54% in 2025. The current account deficit stood at 2.8% of GDP in 2025 and is projected to widen gradually to approximately 3.5% of GDP over the medium term.

The Bank of Albania maintained its policy rate at 2.5%, introduced in July 2025. With inflation at 2.2% in 2025, below the Central Bank's 3% target, **monetary policy** has successfully maintained price stability. Albania's banking sector remains robust, well-capitalised, and profitable. The capital adequacy ratio reached 20.3% at end-September 2025, significantly exceeding the 12% minimum regulatory requirement. Non-performing loans declined to 4.4% in September 2025. Private sector credit growth averaged 12% in the first six months of 2025, with full-year credit growth forecasted at 13%, underpinning economic activity through investment and consumption support.

Albania pursued stability-oriented **fiscal policies**, targeting a deficit of 2.3% of GDP in 2026, consistent with 2025 levels. The 2024 budget deficit reached only 0.7% of GDP while public debt declined to 54% of GDP, down almost 3.6 percentage points from 2023. Public debt is on

a declining trajectory, targeted at 53.6% of GDP in 2026. FDI inflows reached approximately EUR 1.5 billion in 2024, the main financing source of the current account deficit. Standard & Poor's upgraded Albania's sovereign credit rating to BB in March 2025, and Moody's reaffirmed the long-term sovereign credit rating at Ba3 with a stable outlook in October 2025.

Albania faces significant **exposure to external shocks**. Geopolitical tensions, escalating trade measures, and commodity price volatility could affect Albania's key trading partners and weaken external demand. The significant contraction in goods exports of 13.4% in Q3-2025 highlights vulnerability in the manufacturing sector. Continued emigration poses a structural challenge, constraining labour supply despite higher labour force participation rates. Albania has undertaken several measures to enhance resilience. Sustained implementation of the EU reform agenda could boost productivity and growth. Access to funds from the EU Reform and Growth Facility supports investment and structural reforms. Heavy reliance on FDI to finance the current account deficit provides stable, long-term capital inflows, reducing vulnerability to short-term capital flow reversals. Strong banking sector capitalization, declining NPLs, and robust credit growth provide a buffer against financial shocks. Improved sovereign credit ratings enhance market access and reduce financing costs, strengthening fiscal resilience.

Albania's **policy mix is conducive to stability in the near to medium term**, supported by fiscal discipline, prudent monetary management, exchange rate flexibility, and a resilient financial sector. The combination of moderate fiscal expansion through wage increases and capital spending, accommodative monetary policy, and a flexible exchange rate represents a coherent policy mix. However, policymakers must remain vigilant regarding inflation risks from the tight labour market, rising wages, and the minimum wage increase from ALL 40,000 to ALL 50,000 in January 2026, as well as external vulnerabilities linked to a widening current account deficit and limited economic diversification.

**In conclusion, the authorities are pursuing a stability-oriented macroeconomic policy, and the general condition is met.**

#### **b) Assessment of the soundness of the Public Financial Management system(s)**

Albania has established a robust legal framework for sound public financial management (PFM), anchored by a comprehensive organic budget law. The country demonstrates strong commitment to systematic reform through its 2023-2030 PFM Strategy adopted in June 2024, which encompasses all aspects of public financial management and domestic revenue mobilization with a primary focus on medium-term actions for 2023-2026. This strategic framework is complemented by specialized strategies addressing debt management, procurement, external audit, and customs. In December 2024, Albania further strengthened its reform architecture by adopting a Medium-Term Revenue Strategy (MTRS) and Action Plan 2024-2027, targeting a 2.5% of GDP increase in tax revenues between 2019 and 2027 through reforms of tax policy and administration, including enhanced VAT registrations and measures to reduce undeclared work and tax fraud.

The PEFA assessment concluded in July 2025, alongside the OECD SIGMA assessment from early 2025, reveals a mixed but generally improving PFM landscape. On the revenue side, Albania has demonstrated notable strength with total revenues in 2024 exceeding budgeted amounts by 5% and increasing 10% compared to 2023. Tax revenues showed similar robust performance with a 10.1% nominal increase, driven by strong economic performance, public and private sector salary increases, and enhanced tax administration efforts, particularly regarding payroll declaration and tourism sector compliance. The completion of a tax exemptions assessment by June 2025, as committed under the MTRS, further demonstrates progress in revenue policy analysis.

On the expenditure side, the system shows both improvements and persistent challenges. Significant strengths include enhanced public investment management procedures, improved internal control and audit mechanisms, a more robust budget preparation process, and better allocation mechanisms for local government funding. Public expenditure in 2024 increased by 8% compared to 2023, with current expenditure rising 10.5% mainly due to civil service salary reforms and social spending. However, investment spending decreased slightly by 3.1%, primarily due to lower-than-expected implementation of foreign grant-financed projects. Moreover, the work on tax expenditure reduction can be put at risk by the adopted fiscal peace, which provides tax benefits to businesses.

Weaknesses persist in expenditure turnout by economic classification, indicating that while aggregate budget discipline is maintained, excessive reclassifications occur within budget categories. Budget execution reporting also shows deterioration. Additional areas requiring strengthening include financial reporting on entities outside central government, particularly state-owned enterprises and public-private partnerships, public access to fiscal information, public asset management, and legislative scrutiny of audit reports.

The PFM reforms demonstrate strong credibility and relevance, directly addressing identified weaknesses through targeted interventions. The reform of public investment management represents a significant achievement, with Albania approving its first National Single Project Pipeline (NSPP) in July 2023, subsequently refining the approach during 2025 to streamline processes and incorporate Public Private Partnership (PPP) projects. The adoption of a new PPP and concessions law in December 2025, aligned with the EU concessions directive and integrated with the NSPP methodology, addresses previous gaps in managing contingent liabilities and fiscal risks. The submission of a priority projects list for pre-financing under the Reform and Growth Facility through the Western Balkans Investment Framework demonstrates practical application of improved project selection processes.

Since the previous assessment, key achievements include: *first*, the successful fiscal consolidation with the 2024 budget deficit reaching only 0.7% of GDP while public debt declined to 54% of GDP, down almost 3.6 percentage points from 2023, with preliminary 2025 data indicating continued adherence to fiscal rules and targets; *second*, the substantial revenue performance improvement with tax revenues increasing 9% in 2025 over 2024 and capital expenditure trending toward above-target performance; *third*, the establishment of the comprehensive MTRS framework with concrete action plans and the delivery of the tax expenditure assessment report that was submitted in June 2025 (as supporting documentation for a June 2025 Reform Agenda step) and an updated version published in November 2025; and *fourth*, the operationalisation of the NSPP with refined methodologies and alignment with EU-funded investment frameworks.

Regarding internal controls and anti-corruption mechanisms, Albania has established a legal framework for internal control and internal audit largely aligned with international best practices and Public Internal Financial Control standards. The 2024 PIFC report indicates incremental improvement in compliance, though systems remain only partially effective. Internal control compliance has strengthened, but risk management application remains insufficient and managerial delegation is underutilised. While 958 internal audits were conducted in 2024 and recommendations are generally accepted, implementation rates remain relatively low at 53.5% within one year and 61% over two years, suggesting potential vulnerabilities in the accountability chain. The July 2025 ministerial order establishing internal control and verification measures for RGF implementation represents a proactive step, though dedicated RGF audits have not yet been conducted.

The capacity to manage and monitor reforms shows gradual strengthening but faces operational constraints. Internal audit units are 87% staffed, indicating persistent human resource challenges. The re-establishment in October 2025 of an audit subcommittee within the legislature represents progress in oversight mechanisms, though its impact is not yet reflected in performance indicators. The government's annual PIFC reporting demonstrates commitment to systematic monitoring, while ongoing work on instructions for more active internal audit involvement in the RGF review process indicates efforts to strengthen implementation oversight. However, the relatively low rates of audit recommendation implementation and the gaps between legal provisions and their full application suggest that monitoring and enforcement mechanisms require further reinforcement to ensure reform sustainability and effectiveness.

**In conclusion, the soundness of the public finance management system (including the relevant reform strategy) is sufficiently confirmed, and the general condition is met.**

### **c) Assessment of the transparency and oversight of the budget**

Albania's budget transparency is mostly satisfactory, with all key budget documents regularly published. The provisions of the Organic Budget Law are mostly followed, although further improvements in the comprehensiveness and consolidation of budget reporting are needed, including improvements in reporting on SOEs and PPPs. However, budget revisions continue to be done almost exclusively by normative acts by the executive, even in 2025, despite a commitment to use the regular legislative process for budget amendments, when the budget was modified four times through normative acts.

The government has taken steps to improve the monitoring of fiscal risks, which are particularly important when it comes to State Owned Enterprises (SOEs) and PPPs. In November 2025, Albania published its first stand-alone fiscal risk statement, which provides a synthetic overview of fiscal risks. Further improvements in the analytical scope and comprehensiveness of fiscal risk reporting should nevertheless be pursued.

The Supreme Audit Institution (SAI) has an established audit plan, has expanded the scope of audit types, and publishes audit reports in a timely manner. The follow-up of audit recommendations by the executive needs to be improved, though the establishment of a parliamentary subcommittee in 2024 dedicated to audit follow-up is a positive step. The continued existence of this committee under the new legislature was confirmed by Parliament in November 2025.

**In conclusion, budget transparency and oversight of the budget are sufficiently sound and the general condition is met.**

***The general conditions are confirmed as met.***

### 3. European Commission review of the achievement of the steps in the Reform Agendas

The Commission has reviewed the information provided by the beneficiary and has no indication that the implementation of the steps contravenes the general principles outlined in Article 4 and 11(4) of Regulation (EU) 2024/1449 and Article 3 of the Facility Agreement, or the ‘Do No Significant Harm’ principle (DNSH).

#### 1.1.2 Ensure transparency and efficiency of state cadastre services, for investors and citizens and provide clear policy for land usage.

<b>The step under review</b>	<i>Adopt an integrity plan</i>
<b>Baseline</b>	No Integrity Plan in place
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as achieved
<b>Commission assessment of results</b>	<p>The <b>Integrity Plan was approved</b> by the General Director of the State Cadastre Agency by Order No. 1219, dated 25 November 2025. Subsequently, by Order No. 1265, dated 22 December 2025, the General Director appointed an Integrity Coordinator, who acts as an <i>ad hoc</i> monitoring body responsible for overseeing the implementation of the Plan. The Integrity Plan includes a time-bound Action Plan for the period 2025–2027, which defines implementation responsibilities, timelines, and arrangements for monitoring, annual reporting, as well as transparency and public communication. The Integrity Plan implementation is expected to contribute to improved quality, transparency, efficiency and accountability in the delivery of key cadastral services, including the registration of property titles, real rights and liabilities and the issuance of certifications.</p> <p>The development and implementation process has been supported through inter-institutional cooperation, with the General Directorate of Anti-Corruption providing technical expertise. In addition, the preparation of the Action Plan benefited from technical assistance provided under the IPA-funded EU for Good Governance (EU4GG) technical assistance project.</p> <p>The Integrity Plan has been published on the official website of the State Cadastre Agency: <a href="https://www.ashk.gov.al/wp-content/uploads/2025/11/Plani-i-Integritetit-per-Agjencine-Shteterore-te-Kadastres.pdf">https://www.ashk.gov.al/wp-content/uploads/2025/11/Plani-i-Integritetit-per-Agjencine-Shteterore-te-Kadastres.pdf</a></p> <p><b>Based on the above, the Commission considers the step as fully achieved.</b></p>
<b>Checks performed and evidence used in the verification of</b>	<p>In line with the Reform Agenda, the beneficiary provided:</p> <ol style="list-style-type: none"> <li>1. Order No. 1219 of the General Director of the State Cadastre Agency on the Approval of the Integrity Plan of the State Cadastre Agency 2025–2027, dated 25 November 2025</li> </ol>

<b>the step and related findings</b>	<ol style="list-style-type: none"> <li>2. Integrity Plan of the State Cadastre Agency 2025–2027</li> <li>3. Order No. 1769 of the General Director of the State Cadastre Agency on the Establishment of the Working Group for the Draft of the Integrity Plan for the State Cadastre Agency, dated 14 October 2024</li> <li>4. Consultation Report</li> <li>5. List of Participants</li> <li>6. Order No. 1265 of the General Director of the State Cadastre Agency on the Designation of the Integrity Plan Coordinators, dated 22 December 2025</li> </ol>
<b>Double funding</b>	The EU for Good Governance (EU4GG) project provided expert comments on the draft of the Integrity Plan. Based on the Commission’s assessment, the degree of third-party contributions does not constitute a case of double funding.
<b>Clear conclusion on the achievement of the step</b>	<b>Fully achieved</b>

### 1.1.3 Increase the attractiveness and transparency of investments, in line with EU practices, improve State-owned Enterprises and State Aid governance

<b>The step under review</b>	<i>Adopt PPP/concession law in line with EU acquis and EU best practices</i>
<b>Baseline</b>	Existing legislation (Law 125/2013 as amended)
<b>Deadline of the step</b>	June 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as achieved
	<p><b>A new law on Concessions and Public Private Partnership (Law no 88/2025) was adopted</b> by the Albanian Parliament on 12 December 2025. The law was promulgated by the President through Decree no. 7 on 8 January 2026 and published in the Official Journal on 13 January 2026. This law was reviewed by the European Commission prior to its adoption.</p> <p>The Albanian administration states that the new law is partially aligned with Directive 2014/23/EU on the award of concession contracts, and that there are no provisions of the new law that contradict or conflict the Directive, and that the partial alignment only concerns provisions that refer to obligations for EU Member States and are therefore not yet applicable to Albania. This concerns references to the Treaty on the Functioning of the EU, to EU Member States and to aspects on relevant to EU Member States. In addition, Article 4 (scope of application) and in the definition of economic operator, has narrower wording than in the EU Directive. Also, full alignment on monetary thresholds cannot yet be assessed since the</p>

	<p>thresholds are not yet fixed in the law - the law delegates this to the Council of Ministers decision (DCM) which has not yet been adopted, but the intention is to adopt these thresholds in line with the Directive.</p> <p>Overall, the <b>Law can be considered as being aligned with the EU Directive</b> to the extent possible for a non-EU Member State, and this has been confirmed by the relevant Commission service. The Commission will monitor that the remaining provisions are addressed via implementing legislation (especially the DCM on thresholds) to be adopted over the next 9 months and that these remain compliant.</p> <p><b>The draft law is also aligned with EU best practices.</b> The law clarifies the selection process and aims to integrate PPP projects in the broader public investment selection mechanism, abolishes the possibility for unsolicited proposals, clarifies fiscal oversight.</p> <p>Specifically, the new law:</p> <ul style="list-style-type: none"> <li>– Provides more detailed procedures for the award of concessions and PPPs, whereby the selection process will now be embedded in the overall investment project selection procedure under the national single project pipeline (over certain thresholds).</li> <li>– More explicitly specifies the role of the Ministry of Finance in the approval of feasibility studies and PPP contracts as fiscal gatekeeper.</li> <li>– Strengthens transparency and reporting requirements on the implementation of PPPs/concessions through the tightening of reporting provisions, the establishment of a register, and the obligation for contracting authorities to set up contract implementation units.</li> <li>– Abolishes fully the use of unsolicited proposals for PPP projects.</li> <li>– Clarifies to a certain extent the role of different institutional stakeholders: Ministry of Economy, Ministry of Finance and Prime Minister’s office and their subordinate agencies.</li> </ul> <p><b>Based on the above, the Commission considers the step as fully achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<p>In line with the Reform Agenda, the beneficiary provided:</p> <ol style="list-style-type: none"> <li>1. English translation of the adopted law (as part of the submission)</li> <li>2. Correspondence between authorities and relevant Commission’s services on ongoing compliance assessment of the draft law</li> <li>3. Concordance table for the final adopted law</li> </ol> <p>The Commission also consulted the following documentation:</p> <ol style="list-style-type: none"> <li>1. Adopted version of the law by Parliament <a href="https://kuvendiwebfiles.blob.core.windows.net/webfiles/202512241201592485ligj%20nr.%2088%2C%20dt.%2012.12.2025.pdf">https://kuvendiwebfiles.blob.core.windows.net/webfiles/202512241201592485ligj%20nr.%2088%2C%20dt.%2012.12.2025.pdf</a></li> <li>2. Published version of the law in the Official Journal (<a href="https://qbz.gov.al/eli/fz/2026/9/3533bd0e-3a7a-4338-879f-fa0d12fac1b8">https://qbz.gov.al/eli/fz/2026/9/3533bd0e-3a7a-4338-879f-fa0d12fac1b8</a>)</li> </ol>

<b>Double funding</b>	The preparation and drafting of the law benefited from technical support from the EU-funded OECD/SIGMA programme and from the EU co-funded regional IMF/SEE programme. However, the overall process of consultation, drafting and approval of the law was led by the Albanian institutions. Based on the Commission’s assessment, the degree of third-party contributions does not constitute a case of double funding.
<b>Clear conclusion on the achievement of the step</b>	<b>Fully achieved</b>

### 1.1.3 Increase the attractiveness and transparency of investments, in line with EU practices, improve State-owned Enterprises and State Aid governance

<b>The step under review</b>	<i>and PPP/concessions start to be fully integrated into the National Project Pipeline</i>
<b>Baseline</b>	PPP/Concessions not fully integrated into NSPP
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as achieved
<b>Commission assessment of results</b>	<p>This step concerns the regular integration of Public Private Partnership (PPP) and Concessions projects into the structured investment assessment and approval cycle of the Government. In the case of Albania this is the National Single Project Pipeline (NSPP), through which public investments are assessed for maturity and eventual inclusion in the budget process. At the time of the inception of this step, PPP projects were not yet explicitly included in this process.</p> <p>The legal framework determining the approval process of public investments in general, and the inclusion of PPP/concession projects in particular, is determined by the following legal provisions:</p> <ul style="list-style-type: none"> <li>- The law on the management of the budgetary system (9936/2008) which foresees that a procedure for public investment management is established.</li> <li>- The Decision of the Council of Ministers (DCM) on the procedures for the management of public investments (DCM 887 of 27/12/2022, amended in February 2024 and most importantly in March 2025 (DCM180/2025)). This decision implements the law on the budget system. This DCM establishes a single project pipeline and related decision-making procedure that public investment projects with certain characteristics (threshold, strategic nature) need to follow, before inclusion in the budget and implementation.</li> <li>- Orders of the Minister of Finance (MoF) on the determination of thresholds for inclusion of projects in the NSPP (most recently</li> </ul>

updated in May 2025) and on the methodology for the preparation of feasibility studies (most recently updated in September 2025)

- The new PPP and concessions law adopted on 12 December 2025.

The Public Investment Management (PIM) review procedure established by DCM 887 of 2022 initially did not explicitly foresee the inclusion of PPP projects in the NSPP. Indeed, historically and as per the provisions of the previous PPP legislation, the pipeline approval process for PPP projects was mostly separate from that of other public investment projects (using procurement).

This was modified through DCM180/2025 of March 2025, which provides the primary evidence for the integration of PPP/concessions into the NSPP. This modified the definition of public investment used for the NSPP by making it “*regardless of the source of finance*”, thereby opening it up to PPPs. It included a specific provision (Art 3.1) according to which “*strategic investment projects, proposed to be implemented as concession or PPP project, are matured in the National Single Project Pipeline, after the feasibility study is prepared, following the rules provided for the in the applicable legislation for concessions and PPPs.*”

The new law on PPP and concessions adopted in December 2025 clearly confirms and anchors the approval of PPP/concession projects through the provisions of the NSPP. In Art 23 (points 3 and 4) it clearly confirms that investment projects that may take the form of PPPs/concessions are included in the NSPP for pre-approval, if they are covered by the thresholds applicable to the NSPP. The new law also sets specific aspects for feasibility studies that are specific to PPP/concessions projects. Once the projects are mature, they follow the specific approval procedure set under the PPP law, which includes a pre-approval by the MoF before the procedure is announced. The MoF also reviews the PPP/concession contract before it is signed. This, together with a role in the performance and financial review of ongoing PPP/concession contracts, sets the role of the MoF as fiscal gatekeeper.

The orders of the MoF set the thresholds for projects to be included in the NSPP. The thresholds are differentiated per sector. As per the latest DCM update and MoF orders, the thresholds for investment projects to be included as projects in the NSPP have been increased. At the same time, a simplified feasibility assessment has been introduced for smaller investment projects. The Order of the MoF of September 2025 also updates the methodology for the preparation of feasibility studies within the framework of the NSPP. In the latest version of the methodology, specific provisions are included for the calculation of Value for Money for PPP projects. This aligns with the definition of value for money included in the new PPP/concessions law (art 3, point 16).

Therefore, it can be assessed that the legal framework is now in place to require that PPP/concessions are included in the NSPP as part of their review and approval process. Projects are to be included in the

	<p>NSPP as of their inception, in principle before the PPP/concessions modality is selected. The selection of the PPP/concession model should be part of the feasibility assessment conducted under the NSPP provisions.</p> <p>At the same time, the regulatory framework is very novel. The DCM broadening the NSPP to PPP project was adopted in May 2025, the new feasibility study methodology was adopted in September 2025, and the new PPP/Concessions law was adopted in December 2025. At this stage, it is difficult to verify if PPP/concessions are already fully and explicitly integrated in the NSPP and assessed according to the new regulatory framework. The pipeline of projects is relatively slow-moving since projects must go through a maturing process. It will therefore take time to have projects for which it can be demonstrated that the new provisions are applied in full. For instance, the authorities state that the most recent version of the NSPP as adopted by the Council of Minister on 26 November 2025 through DCM 703/2025 contains two projects that are conceived as concession contracts. However, the authorities themselves state in the information provided that these two projects have not yet been subject to the new provisions.</p> <p><b>Based on the above, the Commission considers the step as not yet achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<p>In line with the Reform Agenda, the beneficiary provided:</p> <ol style="list-style-type: none"> <li>1. Law no. 88/2025, dated 12 December 2025 "On concessions and Public Private Partnerships" as published in the Official Journal <a href="https://qbz.gov.al/eli/ligj/2025/12/12/88/f18e479f-bcbc-4129-822d-97490a0a0e96">https://qbz.gov.al/eli/ligj/2025/12/12/88/f18e479f-bcbc-4129-822d-97490a0a0e96</a> alongside its English translation.</li> <li>2. DCM 703 dated 26 November 2025 on an amendment to DCM 91 dated 12 February 2025 on the approval of the "Priority Policy Document 2026-2028" <a href="https://qbz.gov.al/preview/172f66a7-ffd0-467b-85b5-9142825ebcf0">https://qbz.gov.al/preview/172f66a7-ffd0-467b-85b5-9142825ebcf0</a> alongside its English translation.</li> <li>3. DCM 887, as amended by DCM 180 of 20 March 2025 <a href="https://qbz.gov.al/eli/vendim/2024/02/14/70/8bbca64f-1020-417c-927f-d42a72eedd0b;q=VENDIM%20Nr.%2070,%20dat%C3%AB%2014.2.2024">https://qbz.gov.al/eli/vendim/2024/02/14/70/8bbca64f-1020-417c-927f-d42a72eedd0b;q=VENDIM%20Nr.%2070,%20dat%C3%AB%2014.2.2024</a> alongside its English translation.</li> <li>4. Technical Annex explaining the procedural flow for PPP/Concession projects.</li> <li>5. Instruction of the Minister of Finance No. 22 dated 15 September 2025 <a href="https://qbz.gov.al/eli/udhezim/2025/09/15/22/fef2c923-786c-49d6-8aae-2f9491db0858">https://qbz.gov.al/eli/udhezim/2025/09/15/22/fef2c923-786c-49d6-8aae-2f9491db0858</a> alongside its English translation.</li> <li>6. Information regarding the application of the new legal provisions on the two PPP/concession projects included in the most recent version of the NSPP as adopted in November 2025.</li> </ol> <p>The Commission also consulted the following:</p> <ol style="list-style-type: none"> <li>1. Instruction of the Minister of Finance of May 2025 regarding thresholds for the NSPP.</li> </ol>

<b>Double funding</b>	<p>No contributions from third parties were reported in support of the achievement of this step.</p> <p>It should be noted that the EU has over the years provided some funding for technical assistance to the establishment of Public Investment Management (PIM) and NSPP procedures. This included support provided by the EU regional programmes with the IMF (SEE South-Eastern Europe) and World Bank (Fiscal Governance Programme). Technical support has also been provided through the EU for Good Governance programme under IPA 2020.</p> <p>Based on the Commission’s assessment, the degree and type of third-party contribution in this instance does not constitute a case of double funding.</p>
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

### 1.1.3 Increase the attractiveness and transparency of investments, in line with EU practices, improve State-owned Enterprises and State Aid governance

<b>The step under review</b>	<i>Adopt legal base to ensure an operationally independent State Aid Authority and operational arrangements (budget)</i>
<b>Baseline</b>	No legal base in place on an operationally independent State Aid Authority
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary has not reported this step as fully achieved
<b>Commission assessment of results</b>	<p>In November 2025, Albania shared a package of draft legal acts related to state aid and the organisation and functioning of the national authority for the control of state aid. This was followed by further consultations with the Commission. This process is still ongoing, and the legal acts have not been adopted yet.</p> <p><b>On this basis, the Commission considers this step as not achieved within the applicable deadline of 31 December 2025.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	No evidence was provided. The assessment was based on the discussions held with the authorities and other relevant stakeholders in the context of the implementation of the Reform Agenda.
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.

<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.
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### 1.1.3 Increase the attractiveness and transparency of investments, in line with EU practices, improve State-owned Enterprises and State Aid governance

<b>The step under review</b>	<i>[and] amend relevant regulations to introduce rules on the appointment of board members of SOEs, subject to open and merit-based recruitment processes</i>
<b>Baseline</b>	Existing regulations
<b>Deadline of the step</b>	June 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary has not reported this step as fully achieved
<b>Commission assessment of results</b>	Albania provided further information following the Commission’s assessment of the payment conditions for Albania ( <i>Commission Implementing Decision C (2025)6876 final of 8 October 2025</i> ). The policy dialogue on the Commission’s recommendations is still ongoing.  <b>On this basis, the Commission considers this step as not achieved within the applicable deadline of 31 December 2025.</b>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	No evidence was provided. The assessment was based on the discussions held with the authorities and other relevant stakeholders in the context of the implementation of the Reform Agenda.
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 30 June 2026.

**1.1.4 Improve the investment attractiveness framework and in particular the FDI framework and business environment by deregulation and modernisation of business services**

<b>The step under review</b>	<i>Adopt legal amendments to facilitate administrative procedures for businesses</i>
<b>Baseline</b>	Existing regulations
<b>Deadline of the step</b>	December 2024
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary has not reported this step as fully achieved
<b>Commission assessment of results</b>	<p>The deregulation process remains incomplete. Relevant legal amendments are not yet in place. Albania informed the Commission of the planned initiatives and provided the third quarter of 2026 as the tentative timeframe in which different measures under this step will be achieved.</p> <p><b>Based on the above, the Commission considers this step as not achieved within the applicable deadline of 31 December 2025.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	No evidence was provided. The assessment was based on the discussions held with the authorities and other relevant stakeholders in the context of the implementation of the Reform Agenda.
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

**1.1.4 Improve the investment attractiveness framework and in particular the FDI framework and business environment by deregulation and modernisation of business services**

<b>The step under review</b>	<i>Adopt legal amendments to improve and facilitate inspection praxis for businesses</i>
<b>Baseline</b>	Existing inspection procedures
<b>Deadline of the step</b>	December 2025

<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary has not reported this step as fully achieved
<b>Commission assessment of results</b>	<p>The Commission Implementing Decision (CID) C(2024) 7375 final Annex I requires the adoption of legal amendments to improve and facilitate inspection praxis for businesses. The Reform Agenda narrative further clarifies that this step is expected to be implemented through three sub-actions:</p> <ol style="list-style-type: none"> <li>1. Analysis of the Inspectorates Report (December 2024)</li> <li>2. Adoption of a package of legal amendments (December 2025)</li> <li>3. Publication of a checklist on the websites of QKB (National Business Centre – Qendra Kombëtare e Biznesit), Central Inspectorate (December 2025)</li> </ol> <p>The authorities have not provided the abovementioned evidence demonstrating the adoption and entry into force of legal amendments within the meaning of the CID Annex I requirement. <b>On this basis, the Commission considers this step as not achieved within the applicable deadline of 31 December 2025.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	No evidence was provided. The assessment was based on the discussions held with the authorities and other relevant stakeholders in the context of the implementation of the Reform Agenda.
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

**1.1.4. Improve the investment attractiveness framework and in particular the FDI framework and business environment by deregulation and modernisation of business services.**

<b>The step under review</b>	<i>Prepare the Road Map to improve and facilitate reporting praxis of business to government</i>
<b>Baseline</b>	No roadmap in place on improving reporting praxis of business
<b>Deadline of the step</b>	December 2025

<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as achieved
<b>Commission assessment of results</b>	<p>According to the Reform Agenda, this step consists of two sub-steps:</p> <ol style="list-style-type: none"> <li>1. Analysis of Business Praxis Report (December 2024)</li> <li>2. Design a simplified reporting framework (December 2025)</li> </ol> <p>Regarding these sub-steps, in the current reporting period Albania achieved the following:</p> <p>The Analysis of Business Praxis Report was completed in December 2024. It constituted the analytical baseline for the preparation of the roadmap and supported the identification of priority reform areas. It was based on a diagnostic assessment report conducted by means of desk research and surveys among the ministries.</p> <p>In line with the requirement to prepare a Road Map, Albania adopted by Ministerial Order No. 182 dated 30 December 2025 a Roadmap on how to Improve and Facilitate Business-to-Government (B2G) Reporting. The roadmap provides a thorough analysis of the state of business reporting to state agencies, describing it as fragmented and at times overlapping. The roadmap also provides a good description of how the architecture of B2G reporting can be built to simplify and streamline procedures. It is designed as an implementation-oriented instrument that establishes a sequence of actions and assigns institutional responsibilities through a 5- stage model: i) governance and planning; ii) legal and process reforms; iii) development of a digital platform; iv) piloting of the system and training; v) full digital roll-out. The entire system is foreseen to be built over the next two years (2026-2027) and proposes full digitalisation of reporting from businesses to institutions and establishment of data interoperability.</p> <p>However, in order to “improve and facilitate” reporting praxis of businesses to government, the design of a simplified reporting framework is also needed. This simplified framework will be part of a multi-phase plan laid out in the roadmap itself. According to this plan, the design is expected to be further discussed, consulted and presented for endorsement by the Steering Committee by mid-2026.</p> <p>While the Commission acknowledges the progress made and the results so far achieved in the preparation of the Road Map, it also considers that the step cannot be deemed as achieved without the completion of the second Reform Agenda sub-step on the design of a simplified reporting framework.</p>

	<b>Based on the above, the Commission considers this step as not achieved.</b>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	<p>In line with the Reform Agenda, the Beneficiary provided:</p> <ol style="list-style-type: none"> <li>1. Establishment of Working Group Startup Albania Agency - Order no.49, date 13.10.2025</li> <li>2. Working group Verbal/Minutes</li> <li>3. Ministerial Order No. 182 dated 30.12.2025 on the adoption of the “<i>Roadmap to Improve and Facilitate Business-to-Government Reporting</i>”. <a href="https://qbz.gov.al/share/kwKBAfyuT_mnBgJZmrnh-g">https://qbz.gov.al/share/kwKBAfyuT_mnBgJZmrnh-g</a></li> <li>4. Roadmap to Improve and Facilitate Business-to-Government Reporting</li> </ol> <p>The beneficiary also provided some additional information following a request for clarifications:</p> <ol style="list-style-type: none"> <li>1. Diagnosis report/Analysis of Business Praxis Report</li> <li>2. Template questionnaire shared with state institutions as regards B2G reporting</li> <li>3. Clarification that “Roadmap to Improve and Facilitate Business-to-Government Reporting” and the Action Plan for the Improvement of the Framework for Increasing the Attractiveness of Investments, Particularly Foreign Direct Investments, as well as the Business Environment, through Deregulation and Modernisation of Business Services, as approved by Ministerial Order No. 182 dated 30.12.2025, refer to the same document. The difference in wording reflects a broader policy framing used in the title of the Ministerial Order.</li> </ol>
<b>Double funding</b>	<p>The Beneficiary reports that the EU-funded project <i>European Union Integration Support Facility in Albania</i> (EUIS) supported the achievement of this step in a complementary manner, i.e. technical assistance was provided to support the methodological aspects of the drafting process and to facilitate institutional consultation. This support was limited to preparatory and advisory activities, in line with the EUIS Terms of Reference. The drafting, adoption and finalisation of the roadmap and related legal acts were conducted and financed by the national authorities. Based on the Commission assessment, therefore, this support does not constitute a case of double funding.</p>
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

**1.1.4. Improve the investment attractiveness framework and in particular the FDI framework and business environment by deregulation and modernisation of business services.**

<b>The step under review</b>	<i>Adopt an action plan for improving the ranking of Albania in the OECD Policy SME Index</i>
<b>Baseline</b>	No Action Plan for improving the ranking in OECD Policy SME Index
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as achieved
<b>Commission assessment of results</b>	<p>The Albanian Government created an inter-institutional working group to draft an Action Plan on improving Albania’s assessment under the OECD SME Policy Index. <b>The Action Plan was adopted</b> by the Minister of Economy and Innovation (MEI) Order No.178 on 30 December 2025.</p> <p>The Action Plan, based on the findings and recommendations of the OECD SME Policy Index 2022, is therefore expected to improve the ranking of Albania in the Index, as specified in the step requirements. It is structured around policy dimensions covering the full SME life cycle, from entrepreneurship and start-ups to innovation, internationalisation, green transition, and digital transformation. It combines regulatory reforms, institutional strengthening, digitalisation of services and targeted support programmes. It provides for clear responsibilities assigned to line ministries, agencies and regulators. The text, however, does not indicate if the identified measures would need additional financial resources, whether through the state budget or through the donor support, or what might be the potential risks to ensure their implementation as well as actions to mitigate those risks.</p> <p>The Action Plan presents recommendations and tasks for different state institutions, including the MEI, the Albanian Investment Development Agency, the Bank of Albania, universities and other educational institutions, etc. The level of commitment of the relevant state institutions and agencies in its implementation may be challenging, depending on the level of financial and human resources. While there remains room for improvement, the overall Government’s commitment to improve the SME policy Framework is confirmed through the adoption of this Action Plan.</p> <p><b>Based on the above, the step can be considered as fully achieved.</b></p>

<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<p>In line with the Reform Agenda, the Beneficiary provided:</p> <ol style="list-style-type: none"> <li>1. Order of the former Ministry of Economy, Culture and Innovation (today Ministry of Economy and Innovation) No. 258, dated 26.02.2025, for the “<i>Establishment of the Working Group for Drafting the Action Plan for Improving Albania’s Ranking in the OECD SME Policy Index</i>” alongside its English translation.</li> <li>2. Order of the Prime Minister No. 211 dated 10.11.2025 “<i>On the establishment of the Inter-institutional Working Group for the Drafting and Approval of the Action Plan for improving Albania's ranking in the OECD index for SME policies, within the framework of the policy document “National Reform Agenda 2024-2027”</i>” alongside its English translation.</li> <li>3. Order Nr.178 dated 30.12.2025 of the Minister of Economy and Innovation on “<i>The Action Plan for Improving Albania’s Ranking in the OECD SME Policy Index</i>” as published in the Official Journal <a href="https://qbz.gov.al/eli/urdher/2025/12/30/178">https://qbz.gov.al/eli/urdher/2025/12/30/178</a> alongside its English translation.</li> <li>4. “<i>Brief Paper – OECD SME Policy Index Report</i>”: The document analytically summarises the main findings of the OECD 2022 SME Policy Report.</li> <li>5. “<i>Policy Orientation Paper</i>”: This document sets out the main strategic orientations based on the OECD analysis and the recommendations of the “<i>Brief Paper</i>”.</li> <li>6. Lists of participants of the consultative meetings.</li> </ol>
<p><b>Double funding</b></p>	<p>The Ministry of Economy and Innovation (MEI) led the implementation of this step and benefited from the assistance of GIZ (Deutsche Gesellschaft für Internationale Zusammenarbeit) during the preparatory work and during the consultation process on drafting the Action Plan. The Beneficiary reported that this step benefited from approx. EUR 7,400 in targeted technical assistance under GIZ’s SANECA II project, which supported the process through:</p> <ul style="list-style-type: none"> <li>- methodological guidance and analytical support for the preparation of two key background documents, namely the Inception Report / Concept Note for the Policy Orientation Paper and the Policy Orientation Paper underpinning the Action Plan to improve Albania’s performance in the OECD-SIGMA SME Policy Index; and</li> <li>- support to the MEI in the organisation, facilitation, and technical guidance of meetings of the inter-institutional working group, contributing to the coordinated preparation and completion of the Action Plan.</li> </ul> <p>However, the finalisation of the Action Plan’s content and its adoption were the responsibility of and financed by the Albanian government. Based on the Commission’s assessment, the degree of third-party</p>

	contribution in this instance does not constitute a case of double funding.
<b>Clear conclusion on the achievement of the step</b>	<b>Fully achieved</b>

### 1.1.5 Deployment of e-freight and Intelligent Transport Systems

<b>The step under review</b>	<i>Adopt relevant legislation to align with the Regulation of EU 2020/1056 on electronic freight transport information (eFTI)</i>
<b>Baseline</b>	Existing legislation
<b>Deadline of the step</b>	June 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary has not reported this step as achieved
<b>Commission assessment of results</b>	<p>Albania reported that the Inter-Institutional Working Group (IIWG), which was set up in June 2025, had prepared a draft decision for the Council of Ministers (DCM) “<i>On Electronic Freight Transport Information</i>” and its explanatory memorandum. The Commission services provided guidance on some technical and legal questions raised by the IIWG. According to the communicated planning, the adoption of the DCM is expected in the second quarter of 2026.</p> <p><b>On this basis, the Commission considers this step as not achieved within the applicable deadline of 31 December 2025.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	No evidence was provided. The assessment was based on the discussions held with the authorities and other relevant stakeholders in the context of the implementation of the Reform Agenda.
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 30 June 2026.

### 1.1.5 Deployment of e-freight and Intelligent Transport Systems

<b>The step under review</b>	<i>Ratify the added Protocol to the United Nations Convention for the carriage of goods, on the “electronic consignment-note” (eCMR) for International Carriage of Goods by Road needed to deploy eFTI</i>
<b>Baseline</b>	Existing legislation
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as achieved
<b>Commission assessment of results</b>	<p>In line with the Reform Agenda narrative, this step entails two sub-actions:</p> <ol style="list-style-type: none"> <li><b>1. Formal adoption of the ‘Additional Protocol to the Convention on the Contract for the International Carriage of Goods by Road (CMR) Concerning Electronic Consignment Note, as adopted in Geneva on 20 February 2008’ by the Government (June 2025)</b></li> </ol> <p>Council of Ministers adopted the Decision approving the draft Law on Adherence to the Additional Protocol on 30 June 2025 and submitted it to the Parliament for ratification. This constitutes the first procedural step towards ratification. Under this Protocol, the electronic consignment note is granted the same legal status as its paper equivalent, provided it includes all the data required under the original CMR Convention. By promoting the use of e-CMR, the Protocol contributes to efficiency, transparency, and sustainability in logistics operations. It reduces paperwork, improves border crossing procedures, and supports digital innovation in the transport sector.</p> <ol style="list-style-type: none"> <li><b>2. Ratification of the Additional Protocol by the Parliament (December 2025)</b></li> </ol> <p>On 30 October 2025, the Albanian Parliament adopted the Law No. 39/2025 on “<i>Adherence of the Republic of Albania to the Additional Protocol to the Convention on the Contract for the International Carriage of Goods by Road (CMR) Concerning Electronic Consignment Note</i>”, as adopted in Geneva in 2008. The Law was decreed by the President of the Republic of Albania on 17 November 2025 and published in the Official Journal on 19 November 2025.</p> <p><b>Based on the above, the Commission considers the step as fully achieved.</b></p>

<b>Checks performed and evidence used in the verification of the step and related findings</b>	In line with the Reform Agenda, the Beneficiary provided: 1. Law No. 39/2025 adopted on 30.10.2025 2. The link to the published Law in the Official Journal: <a href="http://qbz.gov.al/eli/ligj/2025/10/30/59">http://qbz.gov.al/eli/ligj/2025/10/30/59</a>
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Fully achieved</b>

### **1.1.6 Promotion of export and internationalisation of enterprises, including the facilitation of exports and trade, and value chain support to selected industries with growth potential.**

<b>The step under review</b>	<i>Export promotion and facilitation programme is adopted</i>
<b>Baseline</b>	No existing programme on exports' promotion and facilitation
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as achieved
<b>Commission assessment of results</b>	<p>As only a small percentage of Albanian SMEs export their goods, the government decided to introduce targeted assistance for these enterprises by expanding export promotion programmes, thereby creating a more diversified and robust export ecosystem, and ultimately, contributing to the overall economic growth.</p> <p>In February 2025 the government established an inter-institutional working group to oversee the preparation of a national export programme, ensuring inter-institutional coordination and structured engagement with stakeholders. This led to the <i>2025-2030 Export Promotion and Facilitation Programme (EPFP)</i>, which was adopted by the Ministerial Order No.180 of 30 December 2025.</p> <p>The EPFP presents an analysis of challenges to the export sectors in Albania and identifies priority sectors for both goods and services, including agri-food products, construction materials, textiles and leather, metals, tourism, ICT and business process outsourcing. It proposes measures across four priorities: i) expanding access to new</p>

	<p>markets; ii) facilitating trade and removing administrative technical and financial barriers, iii) improving exporter’s access to finance and iv) strengthening capacities of SMEs and institutions dealing with SMEs. The programme document is accompanied by a monitoring matrix, though it does not include budgeting of each measure.</p> <p>The EPFP document presents an assessment of the current institutional framework and instruments to support exporting SMEs, in line with the existing strategic documents and policies. Its conclusion is that non-exporting Albanian companies, often referred to as potential exporters, may lack awareness, resources or the necessary knowledge to enter international markets, and that extending the reach of export promotion programmes to these potential exporters could provide them with the support and resources needed to explore and enter global markets.</p> <p>The EPFP will implement measures related to: (i) SME-Specific Support; (ii) access to finance for SMEs (financial assistance, grants, or subsidies to help SMEs cover the costs associated with entering and expanding in foreign markets); (iii) quality infrastructure support for exports; and (iv) promoting Networking and Linkages (facilitating connections between SMEs and multinational companies to create partnerships, joint ventures, and integration into global supply chains). While the Programme could have had a better focus on issues such as quality infrastructure, market surveillance, establishment of national traceability system for sectors targeting exports and setting concrete implementation deadlines for each of the planned actions, it lays down concrete targets for each measure and identifies responsible institutions and agencies in charge of coordinating the implementation.</p> <p><b>Based on the above, the Commission considers the step as fully achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<p>In line with the Reform Agenda, the Beneficiary provided:</p> <ol style="list-style-type: none"> <li>1. The Ministry of Economy, Culture, and Innovation approved, by Order of the Minister No. 193, dated 7 February 2025, “<i>The establishment of the working group for the drafting of the program 'For the Promotion and Facilitation of Exports 2030'</i>” alongside its English translation.</li> <li>2. Order of the Minister of Economy and Innovation Nr.180, dated 30 December 2025 “<i>On the approval of the Program for the promotion and facilitation of exports 2026-2030</i>” as published in the Official Journal: <a href="https://qbz.gov.al/eli/urdher/2025/12/30/180">https://qbz.gov.al/eli/urdher/2025/12/30/180</a> alongside its English translation.</li> <li>3. The NATIONAL EXPORT PROGRAM (2025-2030) document in English</li> </ol>

	4. Lists of participants in the consultative meetings held, grouped by economy sectors.
<b>Double funding</b>	<p>The Beneficiary reported that this step benefited from EUR 15,000 in technical assistance financed under the ProSEED 2.0 project implemented by the Deutsche Gesellschaft für Internationale Zusammenarbeit (GIZ), which supported:</p> <ul style="list-style-type: none"> <li>• drafting of the programme and the accompanying documents,</li> <li>• the Ministry of Economy and Innovation in organising and facilitating the meetings with the inter-institutional working group and key stakeholders.</li> </ul> <p>However, the input provided by the Albanian stakeholders was critical to this process and without their input the programme could not have been produced. Moreover, the finalisation of the programme’s content and the adoption of the programme, as well as of the Action Plan, were the responsibility of and financed by the Albanian Government. Based on the Commission’s assessment, therefore, this support does not constitute a case of double funding.</p>
<b>Clear conclusion on the achievement of the step</b>	<b>Fully achieved</b>

### 1.1.6 Promotion of export and internationalisation of enterprises, including the facilitation of exports and trade, and value chain support to selected industries with growth potential

<b>The step under review</b>	<i>Progress in regulatory initiatives related to industrial value chain partnerships with European Union is made</i>
<b>Baseline</b>	No existing legal initiatives
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary has not reported this step as fully achieved
<b>Commission assessment of results</b>	Albania reported on the progress made in mapping and analysing priority value chains, with a specific focus on the textile industry. This should be followed up with enlarging the scope to include other industrial sectors as well as with formulation and adoption of the relevant regulatory acts that will effectively operationalise the

	reform’s objective of promoting export growth, internationalisation, and sustainable value chain integration for Albanian enterprises.  <b>On this basis, the Commission considers this step as not achieved within the applicable deadline of 31 December 2025.</b>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	No evidence was provided. The assessment was based on the discussions held with the authorities and other relevant stakeholders in the context of the implementation of the Reform Agenda.
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

**1.1.6 Promotion of export and internationalisation of enterprises, including the facilitation of exports and trade, and value chain support to selected industries with growth potential.**

<b>The step under review</b>	<i>Continuous progress with Green Lanes initiatives for trade facilitation by adopting the Trade and Transport Facilitation Programme</i>
<b>Baseline</b>	Existing TTFP programme
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as achieved
<b>Commission assessment of results</b>	As part of this step, Albania is committed to adopt a Trade and Transport Facilitation Programme (TTFP) that includes as a component the Green Lanes/Green Corridors, with respective soft and hard measures, costed actions and interventions for implementation. The aim is to enhance and improve the corridors and border crossing points to facilitate trade reforms at the border and improve transport efficiency at key nodes.  <i>I. Continuous progress with Green Lanes initiatives for trade promotion [...]</i>  During the reporting period, Albania adopted an Action Plan on Green Lanes (30 December 2025). On 17 December 2025 it also signed a

	<p>Memorandum of Understanding between the Albanian Customs Directorate and the Hellenic Independent Authority for Public Revenue on facilitating the road traffic at the green corridors and on data exchange at customs by using Systematic Electronic Exchange Data system with Greece. The Albanian Government has also formally reconfirmed to the Commission the strategic priority of the Kakavija Border Crossing Point with Greece under the Green Lanes Initiative and expressed its interest in receiving targeted technical assistance under the EU-WB Safe and Sustainable Transport Program.</p> <p><i>II. [...] by adopting the Trade and Transport Facilitation Programme</i></p> <p>However, for this specific Reform Agenda step to be considered as fully achieved, the Trade and Transport Facilitation Programme (TTFP) II needs to be adopted. The step will be considered achieved when the TTFP II is signed and adopted by both parties (Albania and the World Bank), but this had not taken place by the reporting deadline.</p> <p><b>Based on the above, the Commission considers this step as not achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<p>In line with the Reform Agenda, the Beneficiary provided:</p> <ol style="list-style-type: none"> <li>1. The MoU between Greece and Albania signed on 17.12.2025.</li> <li>2. The Customs Risk Management Strategy 2025-2025 approved with the Recommendation No. 1/2025, of 2.12.2025, of the Joint Committee of CEFTA <a href="https://cefta.int/wp-content/uploads/2025/12/JC-RECOMMENDATION-No-1_2025-on-the-CEFTA-Customs-Risk-Management-Strategy-2025-2028.pdf">https://cefta.int/wp-content/uploads/2025/12/JC-RECOMMENDATION-No-1_2025-on-the-CEFTA-Customs-Risk-Management-Strategy-2025-2028.pdf</a></li> <li>3. The Action Plan on Green Lanes was approved on 30.12.2025 <a href="https://qbz.gov.al/eli/urdher/2025/12/30/183">https://qbz.gov.al/eli/urdher/2025/12/30/183</a> alongside its translation in English.</li> <li>4. Decision no. 703, dated 26.11.2025, on an amendment of the Decision no. 91, dated 12.02.2025, of the Council of Ministers “On the approval of the Priority Policy Document 2026–2028” <a href="https://qbz.gov.al/preview/172f66a7-ffd0-467b-85b5-9142825ebcf0">https://qbz.gov.al/preview/172f66a7-ffd0-467b-85b5-9142825ebcf0</a> alongside its English translation.</li> <li>5. Letter of confirmation of strategic priority Kakavia BCP/VVP Investment in the Framework of Green Lanes Initiative.</li> </ol>
<p><b>Double funding</b></p>	<p>No contributions from third parties were identified or reported in support of the achievement of this step.</p>

<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.
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### 2.1.2. Update of the curricula in primary and secondary education

<b>The step under review</b>	<i>Professional Development Programs for 50% of SPs</i>
<b>Baseline</b>	Current status of Professional Development Programs for Subject Programmes (SPs)
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as achieved
<b>Commission assessment of results</b>	<p>The Albanian Agency for the Assurance of Quality in Pre-University Education (ASCAP) drew up and implemented the professional development programme (ZHVP) for the implementation of effective methodologies in the educational process. Albania reported that it carried out teacher training in accordance with the curriculum implementation classes for the updated subject programmes, in line with the STEM approach. ASCAP carried out a comprehensive and structured process for updating all curriculum documents and for designing the corresponding professional development framework (Ministerial Order No. 610, dated 20 December 2024).</p> <p>The professional development programme was formally approved and operationalised through the National Programme for the Professional Development of Teachers (NPPDT) 2024–2025, approved by the Ministry of Education and Sports through official letter No. 1215/1, dated 19 February 2024, which serves as the national, institutionally endorsed framework for professional development linked to curriculum implementation. In parallel, ASCAP developed:</p> <ul style="list-style-type: none"> <li>• Core Curriculum for Primary Education (Grades I–V – Order 553 + Core Curriculum PE);</li> <li>• Core Curriculum for Lower Secondary Education (Grades VI–IX – Order 551+ Core Curriculum LSE);</li> <li>• Core Curriculum for Upper Secondary Education (Grades X–XII – Order 552 + Core Curriculum HSE).</li> </ul> <p>In addition, the Ministry approved the “National Program of Teacher Professional Development 2026-2028” that refers to “Core Curricula</p>

	<p>and Innovations in Curricular Documents, ASCAP 2025” and “Updated Syllabi, ASCAP 2025”.</p> <p>Considering that the entire core curricula for grades I-XII was updated in 2025 and that the “National Program of Teacher Professional Development 2026-2028” refers to new curricula, <b>the Commission considers the step as fully achieved.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	<p>In line with the Reform Agenda, the Beneficiary provided:</p> <ol style="list-style-type: none"> <li>1. Order of the Minister of Education and Sports, No. 610, dated 20.12.2024.</li> <li>2. Core Curriculum for Primary Education (Grades I–V – Order 553 + Core Curriculum PE).</li> <li>3. Core Curriculum for Lower Secondary Education (Grades VI–IX – Order 551+ Core Curriculum LSE).</li> <li>4. Core Curriculum for Upper Secondary Education (Grades X–XII – Order 552 + Core Curriculum HSE).</li> <li>5. “NATIONAL PROGRAM OF TEACHER PROFESSIONAL DEVELOPMENT 2026-2028”.<a href="https://www.ascap.edu.al/wp-content/uploads/2025/01/Korniza-Kurrikulare-e-miratuar-2024.pdf">https://www.ascap.edu.al/wp-content/uploads/2025/01/Korniza-Kurrikulare-e-miratuar-2024.pdf</a><a href="https://www.ascap.edu.al/kurrikula-e-perditesuar-2025/">https://www.ascap.edu.al/kurrikula-e-perditesuar-2025/</a></li> </ol>
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Fully achieved</b>

**2.1.3. Update the national Qualifications Framework by establishing a clear and transparent relationship between national qualification levels and the relevant European QF levels.**

<b>The step under review</b>	<i>Partly implementing, the ESGs [respectively ESG 3.3 and ESG 2.7] and introduce clear references in the respective bylaws and regulations of QA as criteria for accreditation</i>
<b>Baseline</b>	Status of ESG 2.7 and ESG 3.3 - not implemented
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as achieved
<b>Commission assessment of results</b>	<i>I. Partial implementation of ESG 3.3 and ESG 2.7</i>

The Beneficiary adopted the ‘*Higher Education Policy Document 2030*’ through Order No. 109, dated 12 March 2025. The Policy Document sets out strategic objectives and measures aimed at strengthening quality assurance in higher education and explicitly refers to alignment with the European Standards and Guidelines (ESGs), including ESG 3.3 (Independence of quality assurance agencies) and ESG 2.7 (Complaints and appeals).

The Beneficiary revised ‘*The Higher Education Quality Code*’ through a decision of the Council of Ministers (DCM) No. 600, dated 15 October 2025. The revised Code introduces explicit references to the ESG framework and incorporates key structural elements of ESG 3.3 and ESG 2.7 into the national quality assurance framework.

In particular:

- Regarding ESG 3.3 (Independence), the revised Code strengthens provisions related to the organisational and operational independence of the Quality Assurance Agency in Higher Education (ASCAL), including clearer delineation of responsibilities and safeguards against undue external influence.
- Regarding ESG 2.7 (Complaints and appeals), the revised Code reinforces procedural guarantees enabling higher education institutions to challenge accreditation decisions on the basis of due process and procedural fairness.

In addition to the revised Quality Code, the Quality Assurance Agency in Higher Education (ASCAL) partially completed the implementation of ESG requirements by updating its internal operational framework and by introducing mechanisms that enable stakeholder participation in external quality assurance processes.

ASCAL revised and formally adopted its Quality Assurance Procedures Manual 2025, approved by Order No. 150, dated 23 December 2025. The Manual constitutes the core operational reference document for the implementation of external quality assurance processes and defines, in a structured and detailed manner, the procedures, timelines and responsibilities applicable to the evaluation and accreditation of higher education institutions and study programmes. The Manual further operationalises ESG 2.7 by setting out a structured complaints and appeals procedure, including the right of higher education institutions to appeal decisions of the Accreditation Board where procedural principles, impartiality,

	<p>transparency or due administrative process are alleged to have been violated.</p> <p><i>II. Introduction of clear references to ESGs in bylaws and regulations as accreditation criteria</i></p> <p>The CID Annex I further requires that clear references to ESG 3.3 and ESG 2.7 be introduced in the relevant bylaws and QA regulations as criteria for accreditation.</p> <p>The revised Higher Education Quality Code (DCM No. 600, dated 15 October 2025) contains explicit references to the ESG framework within the accreditation standards and procedures, thereby integrating ESG-based criteria into the national accreditation framework.</p> <p>The Quality Assurance Procedures Manual 2025, approved by Order No. 150 of 23 December 2025, further embeds ESG-based standards into the practical conduct of accreditation procedures, ensuring that ESG 3.3 and ESG 2.7 are reflected in the evaluation criteria applied during external quality assurance processes.</p> <p><b>Based on the above, the Commission considers the step as fully achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<p>In line with the sources of verification, the following evidence was provided:</p> <ol style="list-style-type: none"> <li>1. Higher Education Policy Document 2030: <a href="https://arsimi.gov.al/wp-content/uploads/2025/06/Dokumenti-i-Politikave-te-Arsimit-te-Larte-18022025.pdf">https://arsimi.gov.al/wp-content/uploads/2025/06/Dokumenti-i-Politikave-te-Arsimit-te-Larte-18022025.pdf</a></li> <li>2. The Revised Higher Education Quality Code, DCM No. 600, dated 15.10.2025: <a href="https://qbz.gov.al/eli/vendim/2025/10/15/600/a157babb-f8b2-43f7-ba75-58c3b5dc6a18;q=vendim%20nr.600%20date%2015%2010%202025">https://qbz.gov.al/eli/vendim/2025/10/15/600/a157babb-f8b2-43f7-ba75-58c3b5dc6a18;q=vendim%20nr.600%20date%2015%2010%202025</a></li> <li>3. Quality Assurance Procedures Manual 2025 approved by Order No. 150, dated 23.12.2025 of ASCAL: <a href="https://www.ascal.al/sq/">https://www.ascal.al/sq/</a></li> </ol>
<p><b>Double funding</b></p>	<p>No contributions from third parties were identified or reported in support of the achievement of this step.</p>
<p><b>Clear conclusion on the achievement of the step</b></p>	<p><b>Fully achieved</b></p>

### 2.1.4 Advance digital skills and literacy for youth and ensure the provision of sufficient ICT equipment to public schools and universities

<b>The step under review</b>	<i>Connect 95% of public schools with high-speed (at least 30Mbps) broadband connection</i>
<b>Baseline</b>	Connection rate 33.2% in 2023
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary has not reported this step as fully achieved
<b>Commission assessment of results</b>	<p>The process is still in the public procurement phase. The implementation can start only once the contractor has been selected and contracted.</p> <p><b>Based on the above, the Commission considers this step as not achieved within the applicable deadline of 31 December 2025.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	No evidence was provided. The assessment was based on the discussions held with the authorities and other relevant stakeholders in the context of the implementation of the Reform Agenda.
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

### 2.3.1 Strengthen the R+I national environment by adopting enabling strategic framework

<b>The step under review</b>	<i>Adopt law and implementing legislation on science and research aligned with European Research Area policy</i>
<b>Baseline</b>	Status of current legislation on science and research (no law in place)
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary has not reported this step as fully achieved

<b>Commission assessment of results</b>	<p>In the context of the accession negotiations on Chapter 25 (Science and Research), Albania provided several draft sub-legal acts implementing the legislation on science and research. The acts are currently undergoing consultation with the responsible Commission services. The process is expected to be finalised in late spring 2026.</p> <p><b>Based on the above, and in relation to the specific requirements under the Reform Agenda, the Commission considers this step as not achieved within the applicable deadline of 31 December 2025.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	No evidence was provided. The assessment was based on the discussions held with the authorities and other relevant stakeholders in the context of the implementation of the Reform Agenda.
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

### 2.3.1. Strengthen the R+I national environment by adopting enabling strategic framework

<b>The step under review</b>	<i>Adopt an Action Plan with measures to ensure progress, for Albania to be classified as a moderate innovator in the European Innovation Scoreboard, resulting to the improvement of Albania’s reporting of the EIS indicators</i>
<b>Baseline</b>	No Action Plan on European Innovation Scoreboard (EIS) in place currently
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as achieved
<b>Commission assessment of results</b>	<p>The Beneficiary adopted an action plan with several measures intended to lead Albania towards being classified as a moderate innovator in the European Innovation Scoreboard (EIS) by 2030.</p> <p>The adoption of the Action Plan was preceded by a comprehensive analysis of Albania’s performance in the EIS. The evaluation</p>

	<p>identified areas of relative strength, including selected innovation outputs and business-level innovation activity, as well as persistent structural weaknesses affecting long-term innovation capacity, notably in research and development expenditure, public–private research collaboration, internationalisation of research and knowledge-intensive exports.</p> <p>Particular attention was paid to methodological and reporting gaps, including incomplete indicator coverage, inconsistencies between national data collection methodologies and EIS requirements, and limitations in the use of administrative data for certain indicators. The Commission agrees that these are fundamental issues to address to improve Albania’s position in the scoreboard and consequently should have been addressed through dedicated measures in the action plan.</p> <p>The Action Plan broadly reflects the structure of EIS indicators. However, the Commission considers that it does not include sufficiently concrete and operational measures capable of ensuring measurable progress towards the stated objective. In particular:</p> <ul style="list-style-type: none"> <li>- The Plan does not include baseline figures, making the monitoring of progress very challenging.</li> <li>- Many of the indicators are unclear and lack measurable targets. As for example indicator 2.3.1 simply says ‘cloud computing’.</li> <li>- The timelines for implementation of the measures are frequently simply stated as a year – very often 2030, not mentioning what is to happen between now and 2030 for the measures to be achieved. For several measures, no timeline is included at all.</li> <li>- There are several activities in the Action Plan that are repeated under different indicators, this could lead to a diffusion of responsibility and should be streamlined. For example, 3.2.2 M3 and 3.2.1 M2 or 3.2.2 M1 and 3.2.1 M1.</li> <li>- There is no budget provided for the implementation of the Plan.</li> <li>- The monitoring mechanism should be further explained, to ensure that the progress towards the set objective is achieved.</li> </ul> <p>Taken together, these limitations undermine the Plan’s capacity to ensure progress towards improved EIS reporting and moderate innovator status. <b>On this basis, the Commission considers this step as not achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<p>In line with the Reform Agenda, the Beneficiary provided:</p> <ol style="list-style-type: none"> <li>1. Prime Ministerial Order no. 142, dated 29.08.2025 “<i>On the establishment of the inter-institutional working group for the drafting of an action plan with measures to ensure progress for Albania to qualify as an average innovator in the European</i></li> </ol>

	<p><i>Innovation Scoreboard, resulting in improving Albania's reporting on TEI indicators, within the framework of the policy document 'National Reform Agenda 2024-2027'</i></p> <p>2. Order to the Minister responsible for innovation No. 179, dated 30.12.2025, for the “<i>Approval of the Action Plan with measures to ensure progress for Albania to qualify as an average innovator in the European Innovation Scoreboard, resulting in improving Albania's reporting on TEI indicators</i>”.</p> <p>3. The Action Plan was published in the Official Journal on 30.12.2025: <a href="https://qbz.gov.al/eli/fz/2025/247/620f3ecc-849c-42d0-9393-87c8fb7d6130">https://qbz.gov.al/eli/fz/2025/247/620f3ecc-849c-42d0-9393-87c8fb7d6130</a></p> <p>4. Minutes of meetings of the inter-institutional working group</p>
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

### 3.1.1. Comply with the Digital Identity regulation and implement Digital eWallet for public services

<b>The step under review</b>	<i>Join the EU Third Countries trusted list for the validation of electronic signatures as advanced electronic signature to achieve legal effect of handwritten signature in the EU, first step towards pursuing mutual recognition of qualified trust services</i>
<b>Baseline</b>	Albania is not part of the EU Third Countries trusted list for the validation of electronic signatures
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as achieved
<b>Commission assessment of results</b>	On 27 December 2024, the National Cyber Security Authority (NCSA), acting as the competent authority for electronic identification and trust services, formally submitted an Expression of Interest to the European Commission. With this request, Albania initiated the technical and legal assessment process for inclusion in the EU Trusted List of Third Countries. On 5 December 2025, NCSA confirmed that all technical recommendations issued by the Commission had been addressed at the national level.

	<p>However, the requirement under the CID Annex I is not limited to initiating the process or addressing technical recommendations. It requires the actual joining of the EU Third Countries Trusted List. As of the deadline of 31 December 2025, Albania had not been formally included in the EU Third Countries Trusted List. The technical assessment and decision-making procedure at EU level had not yet been finalised.</p> <p>Following the technical assessment, Albania will need to close any further gaps that may be identified, bringing its trust service providers' technical systems into conformity with the EU standards. Once those gaps are addressed, Albania can be added to the List. It is only at that stage that this reform step can be considered as fully achieved.</p> <p><b>[On this basis, the Commission considers the step as not achieved.]</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	<p>In line with the Reform Agenda, the Beneficiary provided:</p> <ol style="list-style-type: none"> <li>1. Official request letter dated 27.12.2024.</li> <li>2. DG CNECT reply by email and official letter</li> <li>3. Email exchanges (May–December 2025) between DG CNECT and the Albanian institutions</li> <li>4. Legal self-assessment, eIDAS Article 14 Checklist</li> <li>5. Technical documentation package, XML file</li> </ol>
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

### 3.1.2. Update the framework for cyber resilience, by introducing requirements of NIS2 Directive and strengthening relevant institutions

<b>The step under review</b>	<i>National and governmental CERTs are fully operational in line with NIS2 requirements</i>
<b>Baseline</b>	Existing legislation on CERT
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as achieved
<b>Commission assessment of results</b>	The CID Annex I requires that national and governmental CERTs (CSIRTs) be fully operational in line with NIS2 requirements. This

entails both the completion of the legal framework and the effective operationalisation of the relevant structures.

In line with the entry into force of Law No. 25/2024 “*On Cybersecurity*”, the Beneficiary undertook a broad legislative and institutional reform to strengthen the national cybersecurity framework and to align it with the requirements of the NIS2 Directive.

### *I. Legal designation and establishment of National and Governmental CSIRTs*

The establishment and functioning of the Computer Emergency Response Team (CERT) were approved by the Decision of the Council of Ministers (DCM) no. 723 dated 3 December 2025 “*On the Establishment, Organisation, and Functioning of the Cybersecurity Emergency and Crisis Response Team*”. The legal designation of the National and Governmental Cybersecurity Incident Response Teams (CSIRTs) is in place and broadly aligned with the NIS2 governance model.

This fulfils the requirement of formal establishment of the relevant CSIRT structures.

### *II. Completion of the legal framework (subordinate legislation)*

The Reform Agenda clarifies that the step requires completion of the legal framework, including relevant subordinate acts. While more than 19 subordinate acts have been adopted, the legal framework cannot be considered fully complete.

In particular, in line with the Reform Agenda:

- The DCM defining the manner of establishment of sectoral CSIRTs has not yet been adopted, as required under Article 15(5) and Article 48(8) of Law No. 25/2024.
- The Annual Inspection Plan foreseen under Article 30(2)(b) of Law No. 25/2024 has not been published.

As a result, the regulatory framework necessary to ensure full operationalisation of sectoral and governmental CSIRTs remains incomplete.

### *III. Operational capacity and full operational status in line with NIS2*

Prime Minister’s Order No.239 dated 16 December 2024 “*On the approval of the structure and organigram of the National Cyber Security Authority (AKSK)*” formally integrates a sub-unit with Security Operations Centre (SOC) responsibilities. Furthermore, the national plan for responding to large-scale cybersecurity incidents and

	<p>crises has been implemented via the Order of the Director General of the National Cyber Security Authority No. 534, dated 27 December 2024. Procedures for identifying, classifying, escalating, and managing cyber crises have been implemented via a series of legal acts (DCM No. 814 dated 30.12.2025, the Order of AKSK No. 534 dated 27.12.2024, the Order of AKSK No. 458 dated 18.12.2024 and the Order of AKSK No. 299, dated 21.08.2024).</p> <p>However, while legislative, technical and some operational guidance exist, the procedures and operational criteria for sectoral CSIRTs, including the Governmental CSIRT, are not yet fully formalised through a legally required DCM, creating a regulatory gap.</p> <p>In conclusion, while significant progress has been made in strengthening the national cybersecurity framework and operationalising the National CSIRT and the emergency CERT, the step cannot be considered as fully achieved as, as stated above, two of the sub-steps necessary to complete the step have not yet been achieved.</p> <p><b>Based on the above, the Commission considers the step as not achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<p>In line with the Reform Agenda, the Beneficiary provided:</p> <ol style="list-style-type: none"> <li>1. Decision No. 723 of the Council of Ministers (CoM) on the Establishment, Organisation, and Functioning of the Cybersecurity Emergency and Crisis Response Team, dated 3.12.2025</li> <li>2. Decision No. 783 of the CoM on the Organisation and Functioning of the National Cyber Security Authority, dated 18.12.2024</li> <li>3. Decision No. 308 of the CoM on the Adoption of Methodology for Assessing and Analysing Cybersecurity Risk, dated 4.06.2025</li> <li>4. Decision No. 531 of the CoM on the Content and Method of Documenting the Organisational, Technical, and Operational Cybersecurity Measures and the Categorisation of Deadlines for Corrective Measures in Critical and Important Information Infrastructures, dated 25.09.2025</li> <li>5. Decision No. 408 of the National Cyber Security Authority on the Regulation on the Methods and Deadlines for Storing Cybersecurity Incident Logs, dated 7.11.2024</li> <li>6. Decision No. 458 of the National Cyber Security Authority on the Regulation on Procedures for the Management of Cybersecurity Incidents, Countermeasures, and Playbooks dated 18.12.2024</li> </ol>

	<ol style="list-style-type: none"> <li>7. Order No. 299 of the National Cyber Security Authority on the Approval of the Regulation on the Categorization of Cyber Security Incidents, dated 21.08.2024</li> <li>8. Order No.534 of the National Cyber Security Authority on the Approval of the National Plan for Response to Large-Scale Cybersecurity Incidents and Cyber Crisis, dated 27.12.2024</li> <li>9. Order No.181 of the National Cyber Security Authority on the Approval of the Regulation on the Technical Functioning of Sectoral CSIRTs and CSIRTs within Information Infrastructure Operators, dated 27.06.2025</li> <li>10. Directive No.1 of the National Cyber Security Authority on the Approval of the Methodology for Infrastructure Risk Assessment Following a Cyber Incident, dated 11.06.2025</li> <li>11. List of Job Descriptions for National Authority for Cyber Security</li> <li>12. List of platforms used by the Cyber Incident Monitoring and Response Sector</li> <li>13. Certificate of Membership in the Forum of Incident Response and Security Teams (FIRST) for NAIS G-CSIRT, May 2025</li> </ol> <p>The beneficiary additionally submitted:</p> <ol style="list-style-type: none"> <li>1. Decision No.683 of the CoM on the Approval of the Methodology for the Identification of Operators of Critical and Important Information Infrastructures, dated 6.11.2024</li> <li>2. Decision No.351 of the CoM on the Approval of the Registration Fee for Conformity Assessment Bodies on Cybersecurity, dated 25.06.2025</li> <li>3. Decision No.606 of the CoM on the Approval of the National Cybersecurity Strategy 2025–2030 and the Action Plan 2025-2027, dated 23.10.2025</li> <li>4. Order No.200 of the Prime Minister on the Establishment of the Interinstitutional Working Group for the Drafting of the National Cyber Security Strategy 2025-2030 and the Action Plan 2025-2027, dated 10.10.2024</li> <li>5. Decision No.814 of the CoM on the Adoption of Procedures for the Identification, Classification, Escalation, and Management of Cyber Crises, dated 30.12.2025</li> <li>6. Decision No.813 of the CoM on the Approval of the National Cybersecurity Certification Scheme as Well as the Security Levels of the Scheme, dated 30.12.2025</li> <li>7. Order No.316 of the National Cyber Security Authority on the Approval of the Methodology for Determining the Amount of the Administrative Fine, dated 3.11.2025</li> <li>8. Directive No.2 of the National Cyber Security Authority on the Procedure and Criteria for the Application and Registration of</li> </ol>
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	<p>Conformity Assessment Bodies with the National Cyber Security Authority, dated 27.06.2025</p> <p>9. Order No.239 of the Prime Minister on the Approval of the Structure and Organigram of the National Cyber Security Authority, dated 16.12.2024</p> <p>10. Employee Attendance List for the Directorate of Incident Monitoring and Response, SOC C-SIRT Operations Center (November 2025), National Cyber Security Authority</p> <p>11. List of trainings and certificates obtained by the National Cyber Security Authority personnel</p> <p>12. Clarification (Order No.13 of the Prime Minister) on the Approval of the Structure and Organigram of the National Agency of Information Society, dated 25.01.2024</p> <p>13. Evidence of reported incidents</p> <p>14. Control Plans 2025 and 2026</p>
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

### 3.1.2. Update the framework for cyber resilience, by introducing requirements of NIS2 Directive and strengthening relevant institutions

<b>The step under review</b>	<i>Frameworks introduced by NIS2 alignment (CVD framework, crisis management framework), are in place and fully operational</i>
<b>Baseline</b>	No ad hoc CERT structure/Forum of Experts in place
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as achieved
<b>Commission assessment of results</b>	<p>Albania has continued to consolidate its NIS2-aligned framework, adopting a broad package on crisis management, incident handling, Coordinated Vulnerability Disclosure (CVD), risk assessment, Computer Security Incident Response Teams (CSIRT) operation, and enforcement. While crisis procedures exist on paper, governance alignment remains incomplete and nation-wide operational fullness is not yet evidenced.</p> <p>The operability has been assessed as follows:</p>

**Regulatory framework:** As established in the previous step (see above), the procedures and operational criteria for sectoral CSIRTs, including the Governmental CSIRT, have not yet been fully formalised through a legally required DCM, creating a regulatory gap.

**Crisis management framework:** The procedures for managing cyber crises, including identification, classification, escalation, and management, have been formally adopted; however, full implementation and operational roll-out of these procedures are incomplete.

**CVD framework:** While the CVD framework defines the National Cybersecurity Authority as the coordinator and outlines intake channels, triage processes and anonymity protocols, the missing crucial elements (key performance indicators, public advisories, or practices for Common Vulnerabilities and Exposures (CVE)) should be systematised to meet EU good practice and demonstrate full operationalisation.

**Incident management and logging:** Incident management procedures are adopted and aligned with the European Union Agency for Cybersecurity (ENISA) standards. However, partial implementation and lack of sufficient time-related elements prevent the verification of compliance.

**Risk management and CSIRT operation:** The absence of publicly available or shareable risk outputs indicates that, while internal risk assessment activities may exist, their implementation through periodic, measurable and verifiable outputs remains unsubstantiated.

**Supervision and enforcement:** The provided information demonstrates that appropriate mechanisms are in place.

**Accreditation and conformity assessment:** Article 42(2) of Law no. 25/2024 assigns accreditation powers to the Director-General of AKSK, creating an overlap with the legally mandated role of the General Directorate of Accreditation and resulting in a conflict with accreditation legislation, which is not fully aligned with the EU framework.

**Trusted services context:** A national cybersecurity conformity assessment bodies (CAB) does not exist; where no national CAB exists, EU practice allows use of EU accredited bodies.

The initiation of steps and coordination to amend the law “*On accreditation*” and the law “*On permits and licenses*” has been confirmed through the exchange of letters (see evidence below, nos. 19-21).

	<p>Overall, Albania is at a moderate level of preparedness with some to good progress on setting up frameworks, but further efforts are required to (i) harmonise accreditation governance in line with EU rules, and (ii) demonstrate routine operational use of the crisis/CVD frameworks and effective institutionalisation of CERT and sectoral CSIRTs.</p> <p><b>Based on the above and given that the step requires all NIS2-aligned frameworks to be fully operational, the step cannot be considered as fully achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<p>In line with the Reform Agenda, the Beneficiary provided:</p> <ol style="list-style-type: none"> <li>1. Decision No. 783 of the Council of Ministers on the Organization and Functioning of the National Cyber Security Authority, dated 18 December 2024</li> <li>2. Decision No. 683 of the Council of Ministers on the Approval of the Methodology for the Identification of Operators of Critical and Important Information Infrastructures, dated 6 November 2024</li> <li>3. Decision No. 308 of the Council of Ministers on the Adoption of Methodology for Assessing and Analysing Cybersecurity Risk, dated 4 June 2025</li> <li>4. Decision No. 351 of the Council of Ministers on the Approval of the Registration Fee for Conformity Assessment Bodies on Cybersecurity, dated 25 June 2025</li> <li>5. Decision No. 531 of the Council of Ministers on the Content and Method of Documenting the Organizational, Technical, and Operational Cybersecurity Measures and the Categorization of Deadlines for Corrective Measures in Critical and Important Information Infrastructures, dated 25 September 2025</li> <li>6. Decision No. 606 of the Council of Ministers on the Approval of the National Cybersecurity Strategy 2025–2030 and the Action Plan 2025–2027, dated 23 October 2025</li> <li>7. Decision No. 723 of the Council of Ministers on the Establishment, Organization, and Functioning of the Cybersecurity Emergency and Crisis Response Team, dated 3 December 2025</li> <li>8. Decision No. 814 of the Council of Ministers on the Adoption of Procedures for the Identification, Classification, Escalation, and Management of Cyber Crises, dated 30 December 2025</li> <li>9. Decision No. 813 of the Council of Ministers on the Approval of the National Cybersecurity Certification Scheme as Well as the Security Levels of the Scheme, dated 30 December 2025</li> <li>10. Decision No. 408 of the National Cyber Security Authority on the Regulation on the Methods and Deadlines for Storing Cybersecurity Incident Logs, dated 7 November 2024</li> <li>11. Decision No. 458 of the National Cyber Security Authority on the Regulation on Procedures for the Management of Cybersecurity</li> </ol>

	<p>Incidents, Countermeasures, and Playbooks dated 18 December 2024</p> <p>12. Order No. 299 of the National Cyber Security Authority on the Approval of the Regulation on the Categorization of Cyber Security Incidents, dated 21 August 2024</p> <p>13. Order No. 534 of the National Cyber Security Authority on the Approval of the National Plan for Response to Large-Scale Cybersecurity Incidents and Cyber Crisis, dated 27 December 2024</p> <p>14. Order No. 181 of the National Cyber Security Authority on the Approval of the Regulation on the Technical Functioning of Sectoral CSIRTs and CSIRTs within Information Infrastructure Operators, dated 27 June 2025</p> <p>15. Order No. 316 of the National Cyber Security Authority on the Approval of the Methodology for Determining the Amount of the Administrative Fine, dated 3 November 2025</p> <p>16. Directive No. 1 of the National Cyber Security Authority on the Approval of the Methodology for Infrastructure Risk Assessment Following a Cyber Incident, dated 11 June 2025</p> <p>17. Directive No. 2 of the National Cyber Security Authority on the Procedure and Criteria for the Application and Registration of Conformity Assessment Bodies with the National Cyber Security Authority, dated 27 June 2025</p> <p>18. Order No. 239 of the Prime Minister on the Approval of the Structure and Organigram of the National Cyber Security Authority, dated 16 December 2024</p> <p>19. Evidence 20 – Response Letter No. 368, prot., dated 08.07.2024</p> <p>20. Evidence 21 – Sent Letter No. 307, prot., dated 08.04.2024</p> <p>21. Evidence 22 – Letter No. 3139, prot., dated 30.12.2025</p> <p>22. Order No. 317 of the Director General “On the approval of the policy for coordinated vulnerability disclosure (CVD)”, dated 3.11.2025</p> <p>23. Official notification to CII Operators</p> <p>24. Risk Assessment Process Overview</p>
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

### 3.2.1 Improve enabling environment for innovative businesses and their take up of the potential of the green and digital agenda, including enabling relevant financial support

<b>The step under review</b>	<i>Adopt legal act(s) on Innovation support instruments by improving current practice in line with EU practices</i>
<b>Baseline</b>	Existing legislation not in line with EU practices on innovation and innovative companies
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as achieved
<b>Commission assessment of results</b>	<p>During 2024, the Ministry of Economy and Innovation (MEI) and the State Agency for the Support and Development of Startups (Startup Albania) initiated a legal and policy review to identify gaps and inconsistencies in the national framework governing innovation and startup support. The review focused primarily on Law No. 25/2022 “<i>On the Support and Development of Start-ups</i>”, as the core legal act regulating the innovation ecosystem, and assessed its alignment with EU practices on innovation financing, equity-related instruments, and state-supported risk-sharing mechanisms.</p> <p>A preliminary package of amendments to Law No. 25/2022 and the related innovation support framework was finalised in October 2025 and submitted for parliamentary consultation in November 2025.</p> <p>The European Commission services also reviewed the package and confirmed in December 2025 that the approach was aligned with EU practices. The framework is aligned with EU State aid rules for Research, Development and Innovation, notably Commission Regulation (EU) No 651/2014 (GBER) and the De Minimis Regulation, and reflects EU innovation financing practices.</p> <p>The Parliament adopted the Law No.97/2025 amending Law No.25/2022 on 18 December 2025.</p> <p>The sub-legal act was revised through the Decision of the Council of Ministers No.844 of 30 December 2025 to ensure updated eligibility criteria promoting green and digital innovation, amongst other. In general, the adopted legal upgrades improve the current situation and bring the legislation in line with relevant EU practices.</p> <p>By integrating startup development and innovation policy within a unified framework, the amended law explicitly recognises innovation as a distinct policy domain with clearly defined objectives, instruments, and governance arrangements.</p>

	<p>In addition to the legal changes, the Beneficiary introduced a concept note for a new Albania innovation Fund that will further strengthen access to finance for innovative businesses in Albania.</p> <p><b>On this basis, the Commission considers the step as achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<p>In line with the Reform Agenda, the Beneficiary provided:</p> <ol style="list-style-type: none"> <li>1. Law No. 97, dated 18 December 2025 “On the amendment of Law 25/2022 “On the Support and Development of Start-ups” - <a href="https://qbz.gov.al/eli/fz/2026/4/1a6e3938-7c80-4d5a-b2bf-1fba37a2a069">https://qbz.gov.al/eli/fz/2026/4/1a6e3938-7c80-4d5a-b2bf-1fba37a2a069</a></li> <li>2. Presidential decree number 517, dated 31.12.2025 <a href="https://president.al/presidenti-begaj-dekreton-shpallje-ligji-nr-97-2025/">https://president.al/presidenti-begaj-dekreton-shpallje-ligji-nr-97-2025/</a> See also: <a href="https://qbz.gov.al/eli/dekret/2025/12/31/517/c2ab75e6-5926-4989-88e7-a5109a294ba2;q=97%2F2025">https://qbz.gov.al/eli/dekret/2025/12/31/517/c2ab75e6-5926-4989-88e7-a5109a294ba2;q=97%2F2025</a></li> <li>3. <a href="https://kuvendiwebfiles.blob.core.windows.net/webfiles/202601071330418246ligj%20nr.%2097%20dt.%2018.12.2025.pdf">https://kuvendiwebfiles.blob.core.windows.net/webfiles/202601071330418246ligj%20nr.%2097%20dt.%2018.12.2025.pdf</a></li> <li>4. Order No 61 dated 23 December 2025 by the General Director Startup Albania Agency - <a href="https://startupalbania.gov.al/laws/14">https://startupalbania.gov.al/laws/14</a></li> </ol> <p>The beneficiary additionally submitted:</p> <ol style="list-style-type: none"> <li>1. Order No 49 dated 13.10.2025 by the General Director Startup for constitution of the working group: <a href="https://startupalbania.gov.al/laws/13">https://startupalbania.gov.al/laws/13</a></li> <li>2. Investment Fund Business Model – Adopted by order of the General Director Startup Albania state agency No 61., dated 23.12.2025 – Report on Albanian Startup Ecosystem document <a href="https://startupalbania.gov.al/publications/notification/47">https://startupalbania.gov.al/publications/notification/47</a></li> <li>3. Written communication with the European Commission services</li> <li>4. Decision of Council of Ministers, No.844 “On the Approval of the Criteria, Procedures, and Deadlines for the Support of Startup-Ups and Facilitators”, dated 30.12.2025 <a href="https://qbz.gov.al/eli/fz/2026/12/19d4f0cb-746d-44bb-a279-c7ce684c074e">https://qbz.gov.al/eli/fz/2026/12/19d4f0cb-746d-44bb-a279-c7ce684c074e</a></li> </ol>
<p><b>Double funding</b></p>	<p>The Swedish International Development Cooperation Agency (SIDA), under the EU4Innovation project, provided technical assistance to the process of drafting of the amendments to the relevant legislation. However, the degree of such contributions does not constitute a case of double funding.</p>
<p><b>Clear conclusion on the achievement of the step</b></p>	<p><b>Fully achieved</b></p>

### 3.2.1 Improve enabling environment for innovative businesses and their take up of the potential of the green and digital agenda, including enabling relevant financial support

<b>The step under review</b>	<i>Prepare [and execute] a grants scheme with focus on incubators/accelerators, targeting green and/or digital solutions</i>
<b>Baseline</b>	Existing grant scheme does not focus on incubators and accelerators.
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as achieved
<b>Commission assessment of results</b>	<p><i>This step is the first part of a two-part series, consisting in the preparation of a grant scheme for accelerators and incubators, targeting green and digital solutions. The execution of the grant scheme is envisaged under a subsequent step due in December 2026.</i></p> <p>To prepare the grant scheme, the State Agency for the Support and Development of Startups (Startup Albania) initiated regulatory improvements to enable thematic prioritisation and to adapt eligibility and procedural rules for a facilitators' grant scheme.</p> <p>A review of the applicable legal and regulatory framework was completed. This review covered Law No. 97/2025 “<i>On the Support and Development of Startups and Innovation</i>” as amended, and the relevant secondary legislation, in particular Decision of the Council of Ministers No. 844 adopted on 30 December 2025.</p> <p>Startup Albania completed the design of a dedicated grant scheme concept for incubators and accelerators promoting green and digital innovation. The thematic focus of the new scheme is aligned with the Smart Specialisation Strategy, the EU Green Deal and the EU Digital Agenda, covering areas such as renewable energy, circular economy, sustainable agriculture, energy efficiency, digital technologies, artificial intelligence and data-driven solutions. The preparatory design also defined the principles for potential co-financing arrangements with corporates active in green and digital sectors.</p> <p>As part of the preparation phase, a draft call regulation (guidelines) document was prepared. The guidelines set out the evaluation criteria that take into account whether proposals include specific modules for green/digital economy (AI, renewable energy, circular economy). The prepared call (evidence no.4 below) has two components, one for start-ups and one for facilitators. While the step only concerns the facilitators, it is noted as a positive development that the call initiated last year for start-ups is being repeated.</p>

	<p>Based on the information received, the Commission considers that the necessary preparations for a grant scheme with a focus on incubators/accelerators, targeting green and/or digital solutions have been achieved.</p> <p><b>On this basis, the Commission considers the step as achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<p>In line with the Reform Agenda, the Beneficiary provided:</p> <ol style="list-style-type: none"> <li>1. Law No. 25/2022 “On the Support and Development of Start-ups”, as amended - <a href="https://qbz.gov.al/eli/fz/2026/4/1a6e3938-7c80-4d5a-b2bf-1fba37a2a069">https://qbz.gov.al/eli/fz/2026/4/1a6e3938-7c80-4d5a-b2bf-1fba37a2a069</a></li> <li>2. Presidential decree number 517, dated 31.12.2025 <a href="https://president.al/presidenti-begaj-dekreton-shpallje-ligji-nr-97-2025/">https://president.al/presidenti-begaj-dekreton-shpallje-ligji-nr-97-2025/</a></li> <li>3. Decision of Council of Ministers, No. 844 “On The Approval of the Criteria, Procedures, and Deadlines for the Support of Start-Ups and Facilitators” dated 30.12.2025 - <a href="https://qbz.gov.al/eli/fz/2026/12/19d4f0cb-746d-44bb-a279-c7ce684c074e">https://qbz.gov.al/eli/fz/2026/12/19d4f0cb-746d-44bb-a279-c7ce684c074e</a></li> <li>4. Call Regulation “<i>For the implementation and monitoring of the winning projects of the call for financing and/or support measures</i>” GRANT 2026 – Approved by Order of the Director General of the Startup Agency, No. 62, dated 31.12.2025</li> </ol> <p>The beneficiary additionally submitted:</p> <ul style="list-style-type: none"> <li>- Consultations - Written communication with the European Commission services (draft submitted on 16.11.2025, comments received on 5.12.2025)</li> </ul>
<p><b>Double funding</b></p>	<p>Contributions from third parties were identified in support of the achievement of this step. SIDA, under EU4Innovation project, have been providing technical assistance to the process of amending the relevant legislation. On the basis of the Commission’s assessment, the degree of such contributions does not constitute a case of double funding, as the support was primarily focused on enhancing expertise, while the beneficiary delivered the main objectives of the step.</p>
<p><b>Clear conclusion on the achievement of the step</b></p>	<p><b>Fully achieved</b></p>

**4.1.1 Align with electricity integration package to enable electricity market coupling of the EU and Albania, establish the intraday electricity market, operationalise the package in line with the market coupling operator integration plan by 2026**

<b>The step under review</b>	<i>Adopt legal amendments to align with the electricity integration package in line with the Energy Community requirements and start implementation</i>
<b>Baseline</b>	No legal amendments for alignment with the electricity integration package
<b>Deadline of the step</b>	June 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary has not reported this step as fully achieved
<b>Commission assessment of results</b>	<p>The amendments to Law nr.43/2015 “On Power Sector” have been drafted and are undergoing consultation with the Commission services and the Energy Community Secretariat.</p> <p><b>Based on the above, and in relation to the specific requirements under the Reform Agenda, the Commission considers this step as not achieved within the applicable deadline of 31 December 2025.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	No evidence was provided. The assessment was based on the discussions held with the authorities and other relevant stakeholders in the context of the implementation of the Reform Agenda.
<b>Double funding</b>	Contributions from third parties were identified for the preparation of the draft law. The European Bank for Reconstruction and Development provided technical assistance to assist the Ministry of Infrastructure and Energy (MoIE) staff in drafting the amendments. Based on the Commission’s assessment, the degree of such contributions does not constitute a case of double funding.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 30 June 2026.

**4.1.1. Align with electricity integration package to enable electricity market coupling of the EU and Albania, establish the intraday electricity market, operationalise the package in line with the market coupling operator integration plan by 2025**

<b>The step under review</b>	<i>Continue implementation of the electricity integration package by the Transmission System Operator (TSO) and the Nominated Electricity Market Operator (NEMO) by taking the necessary national actions to</i>
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	<i>join day ahead market coupling with the EU in line with Energy Community requirements</i>
<b>Baseline</b>	Day ahead market coupling with the EU
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as achieved.
<b>Commission assessment of results</b>	<p>The adoption of the Electricity Integration Package (EIP) into the national legal framework remains pending, and not all national actions and sub-steps foreseen under this reform measure have been implemented within the reporting timeline. These actions are required for effective implementation by the TSO and NEMO and for joining the EU Day-ahead market coupling, in line with the Energy Community requirements.</p> <p>Although the Energy Regulatory Authority (ERE) adopted the Board Decision No. 45 on 27 February 2025, requiring the introduction of 15-minute time intervals and obliging the Albanian Power Exchange (ALPEX) to ensure technical readiness for 15-minute Day-Ahead Market products in line with the Single Day-Ahead Market Coupling (SDAC) requirements, the implementation is not yet completed. The relevant procurement and contractual arrangements foresee a “go-live” date at the end of the second quarter of 2026.</p> <p>Accordingly, the Reform Agenda’s sub-step on <i>“Implementing electricity product trading with 15-minute resolution for the Day-Ahead Market”</i> is not completed.</p> <p>While ERE adopted the Board Decision No. 291 of 13 November 2025, designed to align with Commission Regulation 2017/2195 establishing a Guideline on Electricity Balancing, in line with Energy Community Ministerial Council Decision No. 2022/03/MC-EnC, the additional evidence provided (document E21) indicates that the transmission system operator OST has only started to identify the legal and technical steps and gaps required for joining the EU balancing platforms. In addition, the application process for observership is conditioned by the positive opinion of the Energy Community Secretariat for the successful transposition of the electricity Integration Package, which is not fully adopted yet by Albania.</p>

	<p>Accordingly, the Reform Agenda’s sub-step “<i>OST to identify and fulfil the legal and technical gaps necessary for joining EU balancing platforms and to apply</i>” is not completed.</p> <p>Albania’s Energy Regulatory Authority (ERE) adopted Board Decision No. 93 of 28 April 2025 approving the Regulation on Capacity Allocation and Congestion Management (CACM), designed to align with Commission Regulation (EU) 2015/1222 of 24 July 2015, in line with Energy Community Ministerial Council Decision No. 2022/03/MC-EnC. However, in its Board Decision No. 293 of 13 November 2025, ERE postponed the entry into force of Decision No. 93 until 1 July 2026.</p> <p>In addition, based on the supplementary evidence provided, the kick-off meeting for the technical assistance supporting OST in the preparation and approval of the Terms and Conditions and Methodologies (TCMs) required for integration into SDAC took place in January 2026, after the step deadline.</p> <p>Accordingly, the Reform Agenda’s sub-step “<i>Prepare and approve the necessary TCMs to join day-ahead market coupling with the EU</i>” is not completed.</p> <p>Nevertheless, progress has been achieved for fulfilling most of the sub-steps related to preparation and adoption of legal, regulatory, institutional, operational, and technical actions, implemented by Albanian authorities and market operators within their respective mandates related to:</p> <ul style="list-style-type: none"> <li>- Regulatory framework and electricity market rules,</li> <li>- Market coupling governance and CACM framework,</li> <li>- Intraday market integration and balancing readiness,</li> <li>- Transposition and approval of EU network codes and guidelines,</li> <li>- Regional coordination and cross-border arrangements.</li> </ul> <p><b>Based on the above, the Commission considers the step as not achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<p>In line with the Reform Agenda, the beneficiary provided:</p> <p><i>Evidence related to Regulatory framework and electricity market rules</i></p> <ol style="list-style-type: none"> <li>1. E1. Decision of the Energy Regulatory Authority (ERE) Board No. 265, dated 10.12.2024, “On approving some additions and amendments to the Electricity Market Rules approved with ERE Board Decision No. 347, dated 27.12.2022, as amended”</li> </ol>

[https://ere.gov.al/media/files/2024/12/30/Vendimi\\_Nr\\_265\\_2024.pdf](https://ere.gov.al/media/files/2024/12/30/Vendimi_Nr_265_2024.pdf) alongside its English translation.

2. E2. Albania Annual Implementation Report 2025 – Energy Community Secretariat – Markets and Integration Pg 3.

*Evidence related to Trading products and implementation of 15-minute granularity*

3. E3. ERE Board Decision No. 45, dated 27.02.2025, “On the implementation of the 15-minute time interval in the operation of balancing market processes”.

[https://ere.gov.al/media/files/2025/03/12/Vendim\\_Nr\\_45\\_2025.pdf](https://ere.gov.al/media/files/2025/03/12/Vendim_Nr_45_2025.pdf) alongside its English translation.

4. E4. ALPEX procurement documentation for the trading and clearing platform service provider, including technical specifications requiring support for 15-minute auction products - Terms of Reference Electronic Platforms for Trading and Clearing, Albania–Kosovo Bidding Zones, for ALPEX Markets and Market Coupling – Point 6 “Service Implementation”, Pg. 26

*Evidence related to Market coupling governance and CACM framework*

5. E5. Single Day-Ahead and Intraday Coupling Observership and Non-Disclosure Agreement (CACM NDA) signed by ALPEX on 14.01.2025.

6. E6. Supporting correspondence and documentation confirming Albania’s participation in SDAC and SIDC governance structures.

7. E7. Documentation evidencing Albania’s participation in the preparation of the Market Coupling Operator Integration Plan (MCO IP) through the Joint Electricity Team of the Energy Community (JET-EnC).

8. E8. Intraday Market Union Operational Agreement between ALPEX, OST, and KOSTT. (pages 108-109 of the Annual ERE Report 2024)

[https://www.ere.gov.al/media/files/2025/04/10/media/files/2025/03/05/Raporti\\_Vjetor\\_2024.pdf](https://www.ere.gov.al/media/files/2025/04/10/media/files/2025/03/05/Raporti_Vjetor_2024.pdf) alongside the English translation of the relevant pages.

*Evidence related to Intraday market integration and balancing readiness.*

9. E9. Albania Annual Implementation Report 2025 – Energy Community Secretariat – Markets and Integration Pg 3.

10. E10. Test reports and documentation covering connectivity tests, Functional Integration Tests (FIT), and simulation/procedure tests

for the Albania–Kosovo intraday market (July–August 2024) pages 108-109 of the Annual ERE report [https://www.ere.gov.al/media/files/2025/04/10/media/files/2025/03/05/Raporti\\_Vjetor\\_2024.pdf](https://www.ere.gov.al/media/files/2025/04/10/media/files/2025/03/05/Raporti_Vjetor_2024.pdf) alongside the English translation of the relevant pages.

*Evidence related to Transposition and approval of EU network codes and guidelines*

11. E11-E12. ERE Decision No. 93, dated 28 April 2025, approving Regulation (EU) 2015/1222 (CACM), as amended by ERE Decision No. 293, dated 13 November 2025.
12. [https://ere.gov.al/media/files/2025/05/13/Vendim\\_Nr\\_93\\_2025.pdf](https://ere.gov.al/media/files/2025/05/13/Vendim_Nr_93_2025.pdf) and [https://ere.gov.al/media/files/2025/11/18/Vendim\\_Nr\\_293\\_2025.pdf](https://ere.gov.al/media/files/2025/11/18/Vendim_Nr_293_2025.pdf) alongside its English versions.
13. E13. ERE Decision No. 290, dated 13 November 2025, approving Regulation (EU) 2016/1719 on Forward Capacity Allocation (FCA).  
[https://ere.gov.al/media/files/2025/11/18/Vendim\\_Nr\\_290\\_2025.pdf](https://ere.gov.al/media/files/2025/11/18/Vendim_Nr_290_2025.pdf) alongside its English version:  
[https://www.ere.gov.al/media/files/2025/12/19/Decision\\_no.\\_290\\_2025.pdf](https://www.ere.gov.al/media/files/2025/12/19/Decision_no._290_2025.pdf)
14. E14. ERE Decision No. 291, dated 13 November 2025, approving Regulation (EU) 2017/2195 on Electricity Balancing.  
[https://ere.gov.al/media/files/2025/11/18/Vendim\\_Nr\\_291\\_2025.pdf](https://ere.gov.al/media/files/2025/11/18/Vendim_Nr_291_2025.pdf) alongside its English version:
15. E15. ERE Board decisions No. 347, dated Regulation (EU) 2017/2196 on Emergency and Restoration [https://www.ere.gov.al/media/files/2026/01/13/Vendim\\_Nr\\_347\\_2025.pdf](https://www.ere.gov.al/media/files/2026/01/13/Vendim_Nr_347_2025.pdf); alongside its English translation
16. E.16 ERE board decision No. 348, dated 29 December 2025 approving Regulation (EU) 2017/1485 on Electricity Transmission System Operation.  
[https://www.ere.gov.al/media/files/2026/01/13/Vendim\\_Nr\\_348\\_2025.pdf](https://www.ere.gov.al/media/files/2026/01/13/Vendim_Nr_348_2025.pdf) alongside its English translation

*Evidence related to regional coordination and cross-border arrangements*

17. E17. Joint Declaration of Western Balkan Transmission System Operators on regional coordination and reconfiguration of the Shadow South-East Europe Capacity Calculation Region (December 2024).

	<p>18. E18. Submission to ACER of the proposal for amendment of Capacity Calculation Regions, including the Shadow SEE CCR (July 2025).</p> <p>19. E19. Italian Border Working Table (IBWT) Operational Agreement – Third Amendment and Adherence Agreement signed by ALPEX and OST on 26 September 2025, including supporting documentation.</p> <p>20. E20. ACER Decision on determination of capacity calculation regions</p> <p>The beneficiary additionally submitted:</p> <p>a. E4 – ALPEX trading platform procurement supporting 15-minute products. Public Procurement Agency – Public Procurement Bulletin 2025- Bulletin No 7 dated 26 January 2026 pg 254 -256 <a href="https://www.app.gov.al/GetData/DownloadDoc?documentId=9c835032-95ab-4890-ba19-8687a1d0a655">https://www.app.gov.al/GetData/DownloadDoc?documentId=9c835032-95ab-4890-ba19-8687a1d0a655</a> New Evidences titled E 24 .</p> <p>b. E14 – Transposition and approval of Regulation (EU) 2017/2195 (Electricity Balancing Guideline). New evidences titled E 21 (OST has started to identify all the legal and technical steps and gaps. The application for the observership status depends on the clear guidance from ENTSO-E/ Balancing Platforms providing all the necessary steps required to join this membership as shown in the email enclosed (E21).</p> <p>c. E11–E14 – Approval of CACM, FCA and Electricity Balancing network codes and embedded methodologies constituting the TCM framework required for participation in EU day-ahead market coupling. New evidences titled E 22 (Following the approval of these regulations, OST initiated the process in January 2026 with a kick-off meeting with the consultancy team, who will support OST in developing, consulting on, and preparing for approval the required Terms, Conditions, and Methodologies (TCMs) to enable integration into the Single Day-Ahead Coupling (SDAC).)</p> <p>d. E20 – ACER Decision No. 10/2025 approving CCR configuration under which the Regional Allocation Platform process is foreseen. New evidences titled E23 (Letter to ECBR from OST, NOSBIH, KOSTT, CGES, MEPSO for the establishment of Regional Allocation Platform of 30 December 2025)</p>
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.

<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.
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#### 4.1.2. Gradual tariff adjustments to market prices accompanied with measures to address energy poverty

<b>The step under review</b>	<i>Gradual phase out of public intervention in the price-setting for the supply of electricity, through deregulation for mid and high voltage, in line with the law on Power Sector</i>
<b>Baseline</b>	No measures in place for deregulation of retail market in mid & high voltage
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as achieved
<b>Commission assessment of results</b>	<p>Albania has been implementing tariff deregulation in line with the Energy Integration Package, and the electricity supply for medium- and high-voltage customers has been fully liberalised. As of 1 January 2026, the transition of 6 kV customers, representing the last remaining category of medium-voltage customers previously subject to regulated supply, has entered into force. This completes the phase-out of regulated electricity prices for medium- and high-voltage customer segments.</p> <p>The Energy Regulatory Authority (ERE) conducted a public information campaign via digital channels (social media and its official website) to (i) inform consumers of their transition to the free market, (ii) remind them of their obligations, and (iii) provide practical guidance on the next steps. Universal Supplier informed clients directly at least 30 days before the end of supply.</p> <p>An action plan for deregulation of the 6 and 10 kV segments was adopted under Ministry of Infrastructure and Energy Order No. 322 (30 December 2024), covering the entire 6–110 kV retail market by December 2025. The action plan is in line with the deregulation of the customer market segments envisaged in the Albanian Power Sector Law. Consequently, the action plan is issued pursuant to, and uses, the Power Sector Law as its legal basis.</p>

	<p>As of January 2026, only customers connected at low voltage (0.4 kV) remain subject to regulated electricity prices.</p> <p><b>Based on the above, the Commission considers the step as achieved.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	<p>In line with the sources of verification, the following evidence was provided:</p> <ol style="list-style-type: none"> <li>1. Ministerial Order No. 322, dated 30.12.2024, approving amendments to the roadmap for market opening and price deregulation and a technical explanation of steps</li> <li>2. Public notification issued by the OSHEE Group JSC (FSHU JSC) on the transition of 6 kV customers to the free electricity market (December 2025) <a href="https://oshee.al/lista-e-subjekteve-private-te-lidhura-ne-tension-6kv-dhe-kriteret-qe-duhet-te-permbushin-ndaj-fshu/">https://oshee.al/lista-e-subjekteve-private-te-lidhura-ne-tension-6kv-dhe-kriteret-qe-duhet-te-permbushin-ndaj-fshu/</a></li> <li>3. Public notification issued by the Energy Regulatory Authority on the transition of 6 kV customers to the free electricity market (December 2025) <a href="https://www.ere.gov.al/sq/publikime/njoftime/njoftim-per-klientet-e-lidhur-ne-tensionin-6kv">https://www.ere.gov.al/sq/publikime/njoftime/njoftim-per-klientet-e-lidhur-ne-tensionin-6kv</a></li> </ol>
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Fully achieved</b>

#### 4.2.2 Implementation of the Renewable Energy Directive: adopt RES legislation, streamline permitting, establish the renewable energy communities, operationalise guarantees of origin

<b>The step under review</b>	<i>Adopt law to align with 2018 Renewable Energy Directive on biomass/biofuels, including sustainability and greenhouse gas emissions saving criteria for biofuels</i>
<b>Baseline</b>	No biofuels law in place aligned with 2018 Renewable Energy Directive on biomass/biofuels, including sustainability and greenhouse gas emissions saving criteria for biofuels
<b>Deadline of the step</b>	June 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary has not reported this step as fully achieved

<b>Commission assessment of results</b>	<p>Albania submitted the proposed legislative draft law on the use of biofuels in transport aimed at aligning its laws with the EU Renewable Energy Directive II (Directive 2018/2001 recast) or RED II relevant provisions on biomass/biofuels for the transport sector only</p> <p>The remaining provisions or bylaws transposing the outstanding articles 25-31 of REDII are still missing and need to be adopted.</p> <p><b>Based on the above, and in relation to the specific requirements under the Reform Agenda, the Commission considers this step as not achieved within the applicable deadline of 31 December 2025.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	No evidence was provided. The assessment was based on the discussions held with the authorities and other relevant stakeholders in the context of the implementation of the Reform Agenda.
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 30 June 2026.

#### **4.2.2 Implementation of the Renewable Energy Directive: adopt RES legislation, streamline permitting, establish the renewable energy communities, operationalise guarantees of origin**

<b>The step under review</b>	<i>System to issue serviceable guarantees of origin for renewable energy operational</i>
<b>Baseline</b>	Guarantees of origin for renewable energy
<b>Deadline of the step</b>	June 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary has not reported this step as fully achieved
<b>Commission assessment of results</b>	Albania reported that the amendments to the Power Sector Law will provide specific provisions aimed at closing the existent gap related to the lack of adoption of disclosure rules and the calculation of the residual energy mix. These measures should make the Guarantees of Origin system fully operational and bring Albania in line with the EU acquis. The Power Sector Law has been drafted and is undergoing

	<p>consultation with the Energy Community Secretariat and Commission services.</p> <p><b>Based on the above, and in relation to the specific requirements under the Reform Agenda, the Commission considers this step as not achieved within the applicable deadline of 31 December 2025.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	<p><a href="https://www.ere.gov.al/media/files/2025/01/22/media/files/2025/01/16/Vendimi_Nr._300_2024.pdf">https://www.ere.gov.al/media/files/2025/01/22/media/files/2025/01/16/Vendimi_Nr._300_2024.pdf</a>No evidence was provided.</p> <p>The assessment was based on the discussions held with the authorities and other relevant stakeholders in the context of the implementation of the Reform Agenda.</p>
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 30 June 2026.

#### **4.2.2 Implementation of the Renewable Energy Directive: adopt RES legislation, streamline permitting, establish the renewable energy communities, operationalise guarantees of origin**

<b>The step under review</b>	<i>Adopt amendments to the in-force regulations for the permit issuance to simplify permit issuance procedures for renewables (households and large installation)</i>
<b>Baseline</b>	No legal amendments in place to simplify permit issuance procedures for renewables
<b>Deadline of the step</b>	June 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary has not reported this step as fully achieved
<b>Commission assessment of results</b>	<p>To achieve this step the Council of Ministers needed to adopt two decisions (DCM):</p> <ol style="list-style-type: none"> <li>1. “<i>On the approval of supporting measures, rules and procedures for obtaining support measures for the production of electricity from renewable sources</i>” related to large installations, which was adopted on 13 November 2024 (Decision No. 695), and</li> </ol>

	<p>2. “On the Approval of the Rules, Procedures, Net Billing Support Scheme, Rights and Responsibilities for Renewable Energy Self-Producers” related to households.</p> <p>The progress related to households remains incomplete. The adoption of the second decision mentioned above is needed to achieve this reform step, but it was not yet ensured by the reporting deadline.</p> <p><b>Based on the above, the Commission considers this step as not achieved within the applicable deadline of 31 December 2025.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	<p>No evidence was provided. The assessment was based on the discussions held with the authorities and other relevant stakeholders in the context of the implementation of the Reform Agenda.</p> <p>See also:  <a href="https://www.qbz.gov.al/eli/fz/2024/194/2e7ee6c6-a922-4870-b78c-d4f36802c208;q=695">https://www.qbz.gov.al/eli/fz/2024/194/2e7ee6c6-a922-4870-b78c-d4f36802c208;q=695</a>, datë 13.11.2024</p>
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 30 June 2026.

#### 4.3.1 Work on carbon pricing with the aim of having an ETS in place by 2030: focus on MRVA package

<b>The step under review</b>	<i>Implementation of MRVA by adopting legal amendments and bylaws to fully align with the EU MRVA Acquis and by building institutional and market readiness to implement Monitoring, Reporting, Verification and Accreditation (MRVA)</i>
<b>Baseline</b>	No legal Amendments in place on MRVA; no capacities in place on MRVA
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary has not reported this step as fully achieved
<b>Commission assessment of results</b>	<p>This step is composed of two parts: (i) regulatory and (ii) non-regulatory part.</p> <p>(i) Albania submitted the proposed legislative drafts aimed at aligning its laws with the relevant EU <i>acquis</i> (the ‘MRVA acquis’) for consultation to the Commission:</p>

	<ul style="list-style-type: none"> <li>• Directive 2003/87/EC of the European Parliament and of the Council of 13 October 2003 establishing a system for greenhouse gas emission allowance trading within the Community and amending Council Directive 96/61/EC,</li> <li>• Commission Implementing Regulation (EU) 2018/2066 of 19 December 2018 on the monitoring and reporting of greenhouse gas emissions pursuant to Directive 2003/87/EC of the European Parliament and of the Council and amending Commission Regulation (EU) No 601/2012,</li> <li>• Commission Implementing Regulation (EU) 2018/2067 of 19 December 2018 on the verification of data and on the accreditation of verifiers pursuant to Directive 2003/87/EC of the European Parliament and of the Council.</li> </ul> <p>The drafts have undergone review, and concordance checks by the Commission services, however Albania is yet adopt the legislation in line with the Commission feedback. Therefore, the completion of the regulatory part of this step is pending.</p> <p><b>(ii)</b> Albania also needs to prepare for the implementation of the MRVA acquis. Firstly, Albania must appoint a competent authority for issuing greenhouse gas (GHG) permits and a national accreditation body in line with the legal requirements of the above stated legislation. This should be followed by capacity building measures of the relevant institutions’ staff, the operators affected by the legislation and other stakeholders of the MRVA annual cycle. The beneficiary reported that several such capacity building workshops took place involving line ministries, implementing institutions, and the private sector. The beneficiary should provide further information on these workshops, including any follow-up measures.</p> <p>Additionally, the obligation to prepare for the MRVA implementation includes also the obligation for each identified regulated entity (operator) to apply for a GHG permit and submit a draft monitoring plan to the Competent Authority, which should in turn conduct the necessary checks, approve the monitoring plans and, on this basis, issue a GHG permit to the related operator. This part can be implemented only after the regulatory framework is in place.</p> <p><b>Based on the above, and in relation to the specific requirements under the Reform Agenda, the Commission considers this step as not achieved within the applicable reporting deadline of 31 December 2025.</b></p>
<p><b>Checks performed and evidence used in the verification</b></p>	<p>In line with the Reform Agenda, the Beneficiary provided:</p>

<b>of the step and related findings</b>	<ul style="list-style-type: none"> <li>• Draft Law on certain additions and amendments to Law No. 155/2020 “<i>On Climate Change</i>”.</li> <li>• Draft Decision of the Council of Ministers approximating Commission Implementing Regulation (EU) 2018/2066 (Monitoring and Reporting – MR).</li> <li>• Draft Decision of the Council of Ministers “<i>On the approval of the special conditions and procedures for the authorisation of greenhouse gas emissions from installations and regulated entities, and the approval of the regulation “On the monitoring and reporting of greenhouse gas emissions from installations, from aircraft operators and from regulated entities, and of aviation effects unrelated to CO<sub>2</sub> emissions”</i>”.</li> <li>• Draft Decision of the Council of Ministers <i>On approval of the regulation “On the conditions, criteria and procedures for the verification of greenhouse gas emissions of the installation operator, the aircraft operator and the regulated entity and the conditions, criteria and procedures for the accreditation of verifiers”</i>.</li> </ul>
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

#### 4.4.1 Adoption and implementation of long-term building renovation strategy, and energy efficiency scheme

<b>The step under review</b>	<i>Adopt the national legislation to align with the regulation on labelling</i>
<b>Baseline</b>	No legal act in place on labelling to align with Acquis
<b>Deadline of the step</b>	December 2024
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary has not reported this step as fully achieved
<b>Commission assessment of results</b>	<p>Albania adopted the Law no. 52/2024 aligning with Regulation (EU) 2017/1369 of the European Parliament and of the Council of 4 July 2017 setting a framework for energy labelling and repealing Directive 2010/30/EU.</p> <p>The by-laws required to fully implement the law that aligns the Albanian national legislation with the above-mentioned regulation have been</p>

	<p>prepared by the relevant Ministry, grouped in one single decision of the Council of Ministers but are still pending formal adoption.</p> <p><b>Based on the above, and in relation to the specific requirements under the Reform Agenda, the Commission considers this step as not achieved within the applicable deadline of 31 December 2025.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	No evidence was provided. The assessment was based on the discussions held with the authorities and other relevant stakeholders in the context of the implementation of the Reform Agenda.
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

#### 4.4.1 Adoption and implementation of long-term building renovation strategy, and energy efficiency scheme

<b>The step under review</b>	<i>Adopt eco-design regulations for solid fuel local space heaters and establish effective infrastructure and capacity for market surveillance accordingly</i>
<b>Baseline</b>	No regulation in place on eco-design
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary has not reported this step as fully achieved
<b>Commission assessment of results</b>	<p>Albania shared its draft law “<i>On the establishment of a framework for setting eco-design requirements for energy-related products</i>”. While Albania has consulted the Commission services on the scope and the content of the draft law, the latter is still pending adoption.</p> <p><b>Based on the above, and in relation to the specific requirements under the Reform Agenda, the Commission considers this step as not achieved within the applicable deadline of 31 December 2025.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	No evidence was provided. The assessment was based on the discussions held with the authorities and other relevant stakeholders in the context of the implementation of the Reform Agenda.

<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

#### 4.4.1 Adoption and implementation of long-term building renovation strategy, and energy efficiency scheme

<b>The step under review</b>	<i>Energy efficiency obligation scheme to be adopted in the Law for Energy efficiency</i>
<b>Baseline</b>	No legal act in place with establishment of Energy Efficiency scheme
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary has not reported this step as fully achieved
<b>Commission assessment of results</b>	<p>The draft law “<i>On Energy Efficiency</i>”, which aims to align the Albanian national legislation with the Directive (EU) 2023/1791 of the European Parliament and of the Council of 13 September 2023 on energy efficiency and amending Regulation (EU) 2023/955 (recast), has been drafted and is undergoing consultation with the Commission services.</p> <p><b>Based on the above, and in relation to the specific requirements under the Reform Agenda, the Commission considers this step as not achieved within the applicable deadline of 31 December 2025.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	No evidence was provided. The assessment was based on the discussions held with the authorities and other relevant stakeholders in the context of the implementation of the Reform Agenda.
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

**5.1.1 Establish an Asset Recovery Office, as a National Coordination Unit and regional/international contact point, contributing to improvement of seizures and confiscation**

<b>The step under review</b>	<i>An Asset Recovery Office is established and operational</i>
<b>Baseline</b>	There is no legal act in place
<b>Deadline of the step</b>	June 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary has not reported this step as fully achieved
<b>Commission assessment of results</b>	<p>Albania established the Asset Recovery Office (ARO) in December 2024 and adopted the Law on ARO in June 2025. Albania further informed the Commission on the adoption of the Order on the structure of the ARO in October 2025 and the adoption of the bylaw on the selection of the ARO Director in December 2025. Further steps towards making the ARO operational, including adoption of the remaining implementing legislation foreseen in the Law, were planned and happened outside of the current reporting period.</p> <p><b>Based on the above, and in relation to the specific requirements under the Reform Agenda, the Commission considers the implementation of this step to be ongoing and not yet fully achieved within the applicable reporting deadline of 31 December 2025.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	No evidence was provided. The assessment was based on the discussions held with the authorities and other relevant stakeholders in the context of the implementation of the Reform Agenda.
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved</b> (within the applicable reporting deadline of 31 December 2025). The ‘grace period’ runs until 30 June 2026.

**5.1.1. Establish an Asset Recovery Office, as a National Coordination Unit and regional/international contact point, contributing to improvement of seizures and confiscation**

<b>The step under review</b>	<i>Submit an application to join the European Network of Asset Recovery Offices or in regional/international recovery platforms</i>
<b>Baseline</b>	No current application to join the European Network of Asset Recovery Offices or in regional/international recovery platforms
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as achieved
<b>Commission assessment of results</b>	<p>Albania continued to implement the Asset Recovery Office (ARO) law adopted in June 2025. Satisfactory fulfilment of this step requires the submission of an application to the European Network of Asset Recovery Offices.</p> <p>The Network is a cooperation framework bringing together national Asset Recovery Offices (AROs) of EU Member States to facilitate cross-border tracing and identification of criminal assets. Full membership of this Network is restricted to Asset Recovery Offices of EU Member States or authorities formally recognised under the applicable EU legal framework. As a third country, Albania cannot become a full member of the European Network of AROs until it accedes to the European Union or until the network's membership criteria are amended. This constitutes an objective circumstance beyond the control of the Albanian authorities.</p> <p>Albania submitted a formal application to the European Network of AROs to be granted observer status in May 2025. Considering that full membership cannot be achieved for a third country under the current legal and institutional framework, Albania has taken the maximum feasible effort available by seeking the observed status.</p> <p>As the Reform Agenda requires the submission of an application, and not full membership, the condition laid down has been fulfilled.</p> <p>In parallel, the relevant authorities established structured cooperation with the EU law enforcement agencies, including through regular exchanges via CARIN (incoming and outgoing asset-tracing and verification requests with EU Member States, Europol and Interpol) and through participating in Europol-supported initiatives, notably via the A.S.S.E.T project. Therefore, the second requirement to prove achievement of the step is also met.</p> <p><b>Based on the above, the Commission considers the step as achieved.</b></p>
<b>Checks performed and evidence used</b>	In line with the Reform Agenda, the beneficiary provided:

<b>in the verification of the step and related findings</b>	<ul style="list-style-type: none"> <li>- Request dated 27 May 2025 submitted to the European Commission, to be granted observer status in the EU Asset Recovery Offices Platform</li> </ul> <p>The beneficiary additionally submitted:</p> <ul style="list-style-type: none"> <li>- Further clarifications on exchanges with EU and regional AROs as well as with(in) CARIN</li> </ul>
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Fully achieved</b>

### 5.2.1 Strengthen the institutional capacity and strategic framework with the aim of reduction of illicit drugs supply and demand

<b>The step under review</b>	<i>A National Early Warning System is operational</i>
<b>Baseline</b>	The National Early Warning System is not operational
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary has not reported this step as fully achieved
<b>Commission assessment of results</b>	<p>The National Early Warning System (NEWS) was set up as a unit within the Albanian State Police in December 2024. Albania informed the Commission that the unit is composed of a Head of Unit and two experts. Albania further informed on multiple activities conducted by the NEWS during 2025, including processing the alerts and responding to letters received from domestic and international institutions. To fully achieve the step, Albania needs to evidence the operationalisation of its structures (e.g. as per the source of verification: evidence of structured dialogue with EUDA, NEWS organigram, SOPs, appointment of focal points to all departments concerned, log of alerts processed), in line with the planned timeline.</p> <p><b>Based on the above, and in relation to the specific requirements under the Reform Agenda, the Commission considers the implementation of this step to be ongoing and not yet fully achieved within the applicable reporting deadline of 31 December 2025.</b></p>

<b>Checks performed and evidence used in the verification of the step and related findings</b>	No evidence was provided. The assessment was based on the discussions held with the authorities and other relevant stakeholders in the context of the implementation of the Reform Agenda.
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved</b> (within the applicable reporting deadline of 31 December 2025). The ‘grace period’ runs until 31 December 2026.

#### 5.4.1 Consolidate judicial independence and accountability by transparency

<b>The step under review</b>	<i>The High Judicial and Prosecutorial Councils ensure high transparency, share publicly all the information related to appointments, (career periodic (evaluations), promotions and transfers, as well as the level of implementation of recommendations of thematic inspections by HJI</i>
<b>Baseline</b>	The current methodology of HJC and HPC for transparency and publication of information on appointments, promotions and transfers.
<b>Deadline of the step</b>	June 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary has not reported this step as fully achieved
<b>Commission assessment of results</b>	<p>The High Judicial Council adopted Decision No. 770, dated 22 October 2025, “<i>On Approval of the Regulation for Transparency and Improvement of the Decision-Making Process in the High Judicial Council</i>”. The beneficiary informed that this Decision includes a methodology on publishing data related to appointments, promotions and transfers.</p> <p>The adoption of the relevant legislative amendments to the Law 96/2016 “<i>On the status of judges and prosecutors in the Republic of Albania</i>” was planned and happened outside of the reporting period. This is expected to further enhance the publication of data on appointments, promotions, and transfers.</p> <p>Additionally, Albania needs to evidence the level of implementation of the recommendations of the thematic inspections by the High Inspector of Justice.</p>

	<b>Based on the above, and in relation to the specific requirements under the Reform Agenda, the Commission considers this step as not achieved within the applicable reporting deadline of 31 December 2025.</b>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	No evidence was provided. The assessment was based on the discussions held with the authorities and other relevant stakeholders in the context of the implementation of the Reform Agenda.
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved</b> (within the applicable deadline of 31 December 2025). The ‘grace period’ runs until 30 June 2026.

#### 5.4.2 Enhance judicial efficiency at all levels

<b>The step under review</b>	<i>HJC effectively adopts and implements a comprehensive road map to increase efficiency and reduce backlog based on the latest methodology as adopted by the CEPEJ backlog reduction tool-book, with measurable targets, statistics, and a robust monitoring structure</i>
<b>Baseline</b>	No roadmap in place to increase efficiency and reduce backlog of High Judicial Council
<b>Deadline of the step</b>	June 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary has not reported this step as fully achieved
<b>Commission assessment of results</b>	Albania adopted the roadmap, (“ <i>Roadmap for the Efficiency of the Judiciary 2025–2027</i> ”) but still needs to ensure and document its implementation, including by developing a human resources plan considering the workload, quality of justice and clearance rates.  <b>Based on the above, and in relation to the specific requirements under the Reform Agenda, the Commission considers this step as not achieved within the applicable reporting deadline of 31 December 2025.</b>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	No evidence was provided. The assessment was based on the discussions held with the authorities and other relevant stakeholders in the context of the implementation of the Reform Agenda.

<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved</b> (within the applicable deadline of 31 December 2025). The ‘grace period’ runs until 30 June 2026.

#### 5.4.2. Enhance judicial efficiency at all levels

<b>The step under review</b>	<i>Ensure a solution for the facilities for the Appeal Court to be accommodated as per the judicial map 2022</i>
<b>Baseline</b>	Status of facilities for the Appeal Court in June 2024
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as achieved
<b>Commission assessment of results</b>	<p>As further specified in the Reform Agenda, full achievement of this step requires that:</p> <p>a) Funding is allocated by state budget for study on the solution for the facilities adequate for accommodating Appeal Court as per judicial map 2022.</p> <p>The Government adopted a two-tier approach to finding a solution for the facilities of the Court of Appeal of General Jurisdiction. This approach foresees: (i) a temporary solution applicable for the period 2025–2027 and (ii) a permanent solution. The temporary solution consists of two complementary measures namely: (a) leasing private property for two years to accommodate 23 legal assistants; and (b) constructing an additional floor on the existing Court of Appeal building to address the Court’s administrative needs. However, securing adequate temporary archives and hearing rooms is pending. The beneficiary also presented a budget plan, that falls under the Medium-Term Budget Programme 2026-2028, that was approved in 2025.</p> <p>b) The High Judicial Council (HJC) begins the process of tendering for renting adequate facilities for accommodating the Appeal Court as per the judicial map 2022 in the interim period.</p> <p>The beneficiary provided as evidence a leasing agreement to prove that implementation has begun concerning the first complementary temporary measure but did not provide evidence that implementation</p>

	<p>of the second temporary measure (i.e. issuance of a re-construction permit) has begun.</p> <p>c) The HJC commissions a study which designates a location and type of intervention for the facilities adequately accommodating the Appeal Court as per the judicial map 2022.</p> <p>Regarding the permanent solution, the Government provided plans that foresee the transfer of use and reconstruction of an existing state-owned building that will house the Court of Appeal. According to the evidence, the new facilities would accommodate approximately 85 staff members, and will include hearing, clerk and meeting rooms, offices (21 out of 50 will be allocated to judges), archive and server spaces, waiting areas. The security provisions are also embedded in the plans. These features will be key to ensure facilities are fit for purpose.</p> <p>Finally, based on the information provided, it appears that the beneficiary plans to continue making use of the temporary solution premises, beyond 2027, due to the high number of staff. To be noted that satisfactory fulfilment of this step, requires that the proposed permanent solution addresses the increasing human resources needs.</p> <p>d) The HJC begins the implementation of findings of a study on the solution for the facilities adequate for accommodating the Appeal Court as per the judicial map 2022.</p> <p>According to the beneficiary, implementation of the permanent solution is foreseen to begin in 2026 (i.e. issuance of construction permit). Therefore, this requirement is pending achievement.</p> <p>To fully achieve this step, Albania should (a) demonstrate that the final solution will adequately accommodate the Appeal Court needs as per the judicial map 2022, and (b) begin the implementation of the conducted studies, a requirement which is pending for both the temporary and permanent solution.</p> <p><b>Based on the above, the Commission considers the step as not achieved.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<p>In line with the Reform Agenda, the Beneficiary provided:</p> <ol style="list-style-type: none"> <li>1. Council of Ministers Decision No. 173, dated 20 March 2025, transferring the administrative responsibility from the General Directorate of Taxation to the High Judicial Council, for the Court of Appeal of General Jurisdiction, concerning the property known as “Large Taxpayers Office”, located in cadastral zone 8150, property no. 6/277, Tirana; and <a href="#">link</a> to the publication in the Official Journal</li> </ol>

	<ol style="list-style-type: none"> <li>2. The structural reinforcement and reconstruction project of the former “Large Taxpayers Branch” building, transferred to the High Judicial Council for the needs of the Court of Appeal</li> <li>3. Medium-Term Budget Programme (MTBP) 2026-2028 (<a href="#">link to its publication</a>)</li> <li>4. High Judicial Council Decision No. 574, dated 26 August 2025, approving the MTBP 2026–2028 and <a href="#">link of its publication</a></li> </ol> <p>The beneficiary additionally submitted:</p> <ol style="list-style-type: none"> <li>1. Certification by the Ministry of Justice No. 6505, dated 23 December 2025, concerning the translation of DCM No.73, dated 20 March 2025</li> <li>2. Project plans, including feasibility plan and technical specifications for the construction of an additional floor on the existing Court of Appeal building</li> <li>3. Handover act dated 24 July 2025, between the General Directorate of Taxation and the High Judicial Council for the transfer of the ‘Large Taxpayers Branch’ for the Court of Appeal of General Jurisdiction</li> <li>4. Lease contract dated 16 September 2025 between private lessor and lessee (Appeal Court of General Jurisdiction)</li> </ol>
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved.</b> The ‘grace period’ runs until 31 December 2026.

#### 5.4.2 Enhance judicial efficiency at all levels

<b>The step under review</b>	<i>Improve the national judicial statistics by adopting and implementing a new instruction of Minister of Justice on national justice statistics, based on CEPEJ methodology and in consultation with the self-government justice institutions</i>
<b>Baseline</b>	The current instruction No.4 dated 15 April 2019 ‘On the Completion of Statistical Data’
<b>Deadline of the step</b>	June 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary has not reported this step as fully achieved

<b>Commission assessment of results</b>	<p>Full achievement of the step requires implementation of the June 2025 ministerial instruction No. 2 (“<i>On the methodology for the collection of national statistical data in the justice system</i>”). The self-governing judicial institutions, notably the High Judicial Council (HJC) and the High Prosecutorial Council (HPC), need to harmonise their internal procedures in line with the instruction and provide evidence that the new methodology is integrated in their working modalities.</p> <p><b>Based on the above, and in relation to the specific requirements under the Reform Agenda, the Commission considers this step as not achieved within the applicable deadline of 31 December 2025.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	<p>No evidence was provided. The assessment was based on the discussions held with the authorities and other relevant stakeholders in the context of the implementation of the Reform Agenda.</p> <p>See also:  <a href="https://www.drejtesia.gov.al/statistika/">https://www.drejtesia.gov.al/statistika/</a></p>
<b>Double funding</b>	<p>No contributions from third parties were identified or reported in support of the achievement of this step.</p>
<b>Clear conclusion on the achievement of the step</b>	<p><b>Not achieved.</b> The ‘grace period’ runs until 30 June 2026.</p>

### 5.5.1 Effectively prevent corruption, decrease incidence of corruption

<b>The step under review</b>	<p><i>Enhance the transparency, by establishment of an open data platform on national and local budget and public spending in partnership with civil society, and publication of all asset declarations on the website of the High Inspectorate of Declaration and Audit of Assets and Conflicts of Interest (HIDAACI), in compliance with the law on right to information and protection of personal data</i></p>
<b>Baseline</b>	<ul style="list-style-type: none"> <li>- Existing data on the opendata.gov.al platform, administered by NAIS</li> <li>- Existing online electronic system of asset declarations, administered by HIDAACI</li> </ul>
<b>Deadline of the step</b>	<p>December 2024</p>
<b>Conclusion of the review of the step by the beneficiary</b>	<p>The beneficiary has not reported this step as fully achieved</p>

<p><b>Commission assessment of results</b></p>	<p>Achievement of this step requires fulfilment of two components:</p> <ol style="list-style-type: none"> <li><b>1. Establishment of an open data platform on national and local budget and public spending in partnership with civil society</b></li> </ol> <p>Albania has set up a ‘Transparent Albania’ platform, under the responsibility of the Minister of State for Public Administration. At present, this platform remains a beta-version and does not offer additional transparency on budget data. The platform will need to be further developed. Alternatively, budget transparency could be enhanced through other platforms.</p> <ol style="list-style-type: none"> <li><b>2. Publication of all asset declarations on the website of HIDAACI, in compliance with the law on right to information and protection of personal data</b></li> </ol> <p>In December 2025, HIDAACI published on its website nearly 300 asset declarations of politically exposed persons, such as members of Parliament and government, members of justice institutions, and mayors.</p> <p>On these bases, <b>the Commission considers this step as not achieved within the applicable reporting deadline of 31 December 2025.</b></p>
<p><b>Checks performed and evidence used in the verification of the step and related findings</b></p>	<p><a href="https://www.ildkpmi.al/identifikohu-ne-ealbania/">https://www.ildkpmi.al/identifikohu-ne-ealbania/</a></p> <p>No evidence was provided. The assessment was based on the discussions held with the authorities and other relevant stakeholders in the context of the implementation of the Reform Agenda.</p>
<p><b>Double funding</b></p>	<p>No contributions from third parties were identified or reported in support of the achievement of this step.</p>
<p><b>Clear conclusion on the achievement of the step</b></p>	<p><b>Not achieved</b> (within the applicable deadline of 31 December 2025). The ‘grace period’ runs until 30 June 2026.</p>

### 5.6.1 Enhance freedom of expression, in line with European standards

<p><b>The step under review</b></p>	<p><i>Increased capacities of law enforcement bodies to handle cases of violence, including on the margins of protests, and other criminal cases involving journalists, notably by ensuring high human rights compliance in handling incidents involving journalists, through binding instructions, data collection and capacity building measures</i></p>
<p><b>Baseline</b></p>	<p>75 police officers trained on protection of journalists including on the margin of protests</p>

<b>Deadline of the step</b>	June 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary has not reported this step as fully achieved
<b>Commission assessment of results</b>	<p>Achievement of this step requires satisfactory fulfilment of three components: (i) increased capacities of law enforcement through binding instructions, (ii) data collection and (iii) capacity-building measures.</p> <p>Albania has issued some soft measures on journalists' safety (binding instructions) and conducted some training; however, the developments in both components fall short of the Reform Agenda indicators. In addition, Albania needs to further evidence an enhanced data collection system.</p> <p><b>Based on the above, and in relation to the specific requirements under the Reform Agenda, the Commission considers this step as not achieved within the applicable reporting deadline of 31 December 2025.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	No evidence was provided. The assessment was based on the discussions held with the authorities and other relevant stakeholders in the context of the implementation of the Reform Agenda.
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved</b> (within the applicable deadline of 31 December 2025). The 'grace period' runs until 30 June 2026.

### 5.6.1 Enhance freedom of expression, in line with European standards

<b>The step under review</b>	<i>Adopt amendments of legal framework on transparency of media ownership</i>
<b>Baseline</b>	AMA draft regulation regarding media ownership transparency in compliance with the current legislation
<b>Deadline of the step</b>	December 2024
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary has not reported this step as fully achieved

<b>Commission assessment of results</b>	Albania adopted some relevant legislative amendment(s) in January 2026 (outside of the reporting period). These amendments are expected to further align the Albanian legislation with the European Media Freedom Act.  <b>Based on the above, and in relation to the specific requirements under the Reform Agenda, the Commission considers this step as not achieved within the applicable reporting deadline of 31 December 2025.</b>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	No evidence was provided. The assessment was based on the discussions held with the authorities and other relevant stakeholders in the context of the implementation of the Reform Agenda.
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Not achieved</b> (within the applicable deadline of 31 December 2025). The ‘grace period’ runs until 30 June 2026.

### 5.7.1 Aligning visa requirements with European standards

<b>The step under review</b>	<i>Terminating visa-free agreements with at least two countries in 2025, and at least one each in both 2026 and 2027, which are visa required for the EU [measured at the end of each year, i.e. December 2025, December 2026, and December 2027].</i>
<b>Baseline</b>	13 cases that are non-compliant with EU rules (7 in the permanent list and 6 in the so-called “seasonal list”).
<b>Deadline of the step</b>	December 2025
<b>Conclusion of the review of the step by the beneficiary</b>	The beneficiary considers this step as achieved.
<b>Commission assessment of results</b>	As of 31 December 2024, Albania maintained a visa-free regime with 13 countries that were on the EU list of visa-required countries. Seven of these countries benefited from a permanent visa exemption while six enjoyed a seasonal visa exemption for entry into Albania for tourism purposes.  To comply with the step requirement for 2025, Albania removed two countries from its visa-free list by the end of 2025. On 9 April 2025, the Council of Ministers adopted a decision to renew the list of

	<p>countries with seasonal visa exemption, removing Bahrein from it. On 24 April 2025, the Council of Ministers also adopted a decision to suspend the visa waiver agreement with Belarus for all passport holders. The termination of the visa waiver took effect in October 2025.</p> <p><b>Based on the above, the Commission considers this step as fully achieved.</b></p>
<b>Checks performed and evidence used in the verification of the step and related findings</b>	<p>In line with the Reform Agenda, the following evidence was provided:</p> <ol style="list-style-type: none"> <li>1. Council of Ministers Decision No. 209, dated 9 April 2025, “On some additions and amendments to the Decision of the Council of Ministers No. 858, dated 29 December 2021 (<a href="#">link to Official Journal</a>)</li> <li>2. Council of Ministers Decision No. 236, dated 24 April 2025 on “Suspension of the agreement between the Council of Ministers of the Republic of Albania and the government of the Republic of Belarus, on the mutual abolition of visa requirements”) (<a href="#">link to Official Journal</a>)</li> </ol>
<b>Double funding</b>	No contributions from third parties were identified or reported in support of the achievement of this step.
<b>Clear conclusion on the achievement of the step</b>	<b>Fully achieved</b>