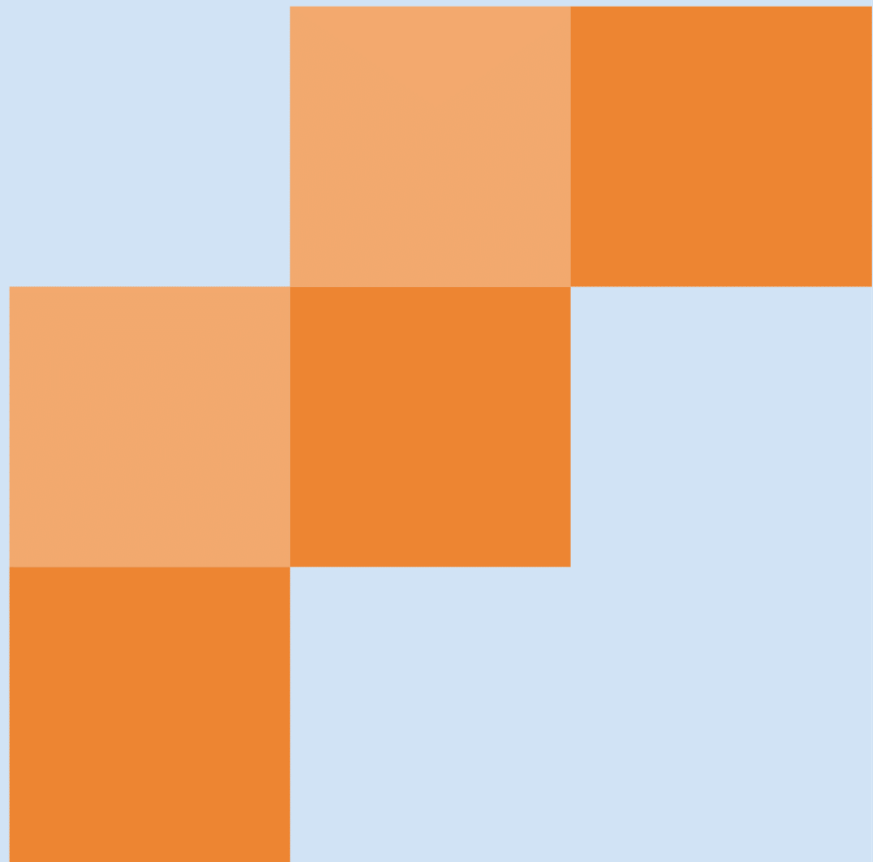


Monitoring Matrix on Enabling Environment for Civil Society Development

PARTNERSALBANIA
FOR CHANGE AND DEVELOPMENT

Country Report:
Albania 2024



Monitoring Matrix on Enabling Environment for Civil Society Development

Country Report for Albania 2024

Partners Albania for Change and Development

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List of Abbreviations

| | |
|--------------|---|
| AASCA | Agency for the Administration of Sized and Confiscated Assets |
| ASCS | Agency for the Support of Civil Society |
| BCSDN | Balkan Civil Society Development Network |
| CoE | Council of Europe |
| CSO | Civil Society Organisation |
| EU | European Union |
| FIA | Financial Intelligence Agency |
| FY | Fiscal Year |
| HJC | High Judicial Council |
| GDT | General Directory of Taxation |
| ICT | Information and Communication Technology |
| MoJ | Ministry of Justice |
| MoHSP | Ministry of Health and Social Protection |
| ML | Money Laundering |
| MM | Monitoring Matrix |
| NCCS | National Council for Civil Society |
| NCEI | National Council for European Integration |
| NPO | Non-Profit Organisations |
| NRC | National Resource Centre |
| PA | Partners Albania for Change and Development |
| PPEI | Partnership Platform for European Integration |
| TF | Terrorist Financing |

Introduction

Partners Albania for Change and Development is pleased to present the 11th edition of the “*Monitoring Matrix on Enabling Environment for Civil Society Development – Country Report for Albania 2024*”. The report reflects developments during 2024 but also includes some key development from early 2025 to provide a more comprehensive and up-to-date overview.

This report is part of a series of country reports covering six Western Balkan countries: Albania, Bosnia and Herzegovina, Kosovo, North Macedonia, Montenegro, and Serbia. Also, a regional report is available, summarising findings and recommendations for all countries, along with an interactive web platform providing access to monitoring data for each country at www.monitoringmatrix.net.

The Monitoring Matrix, developed in 2013 by BCSDN with the support of its members and partners, presents the main principles and standards that have been identified as crucial to exist for the environment to be considered enabling for the operations of NPOs. The Monitoring Matrix is organised around three areas, each divided by sub-areas:

- Basic Legal Guarantees of Freedoms;
- Framework for CSOs’ Financial Viability and Sustainability;
- State – CSO Relationship.

The comprehensive methodology is based on international standards and the best regulatory practices within the European Union and European countries. The Monitoring Matrix aims to define the optimal conditions for civil society to function and develop effectively while providing a framework for public authorities to follow and implement. Recognising that the primary challenges lie in implementation, 139 indicators have been established to monitor the existing legal framework and its practical application.

The Monitoring Matrix operates on an annual reporting cycle, ensuring systematic and comparable evaluation across the region and over time. This process helps stakeholders track progress or regression, identify gaps and emerging trends, and prioritise reforms. The research aims to support shadow reporting on the enabling environment for civil society development and to influence EU Enlargement policy and funding to foster the sector's sustainable and strategic development.

Executive Summary

Civil Society Overview

| | 2023 | 2024 |
|---|---|---|
| Number of registered organisations | 12,768 NPOs 253 NPO registered in 2023 | 13,053 NPOs 284 NPO registered in 2024 |
| Main civil society laws | Civil Code of Albania. Law No. 8788/2001 “For non-profit organisation”. Law No. 8989/2001 “For the registration of non-profit organisation” Law No. 80/2021 “For the registration of non-profit organisations” | |
| Relevant changes in the legal framework | Instruction No. 11, dated 13.04.2023, “For some additions and changes to Instruction No. 6, dated 30.01. 2015, ‘On the Value Added Tax in the Republic of Albania”, amended Law no 78/2023 “For some changes and additions of the Law No. 119/2014 “For the Right to Information”, updated | Draft Law on Volunteering DCM No. 611, date 2.10.2024, “For the Approval of the Roadmap for Functioning of the Democratic Institutions” |
| State funding | Agency for the Support of Civil Society: 98 million ALL (Approx. 980,000 EUR). | Agency for the Support of Civil Society: 96.5 million ALL (approx.968,150 EUR) |
| Human resources (employees and volunteers) | 10,917 employees of which 9,748 full-time employees and 1,169 part-time employees No available data on volunteers | 9,875 employees of which 8,916 employed full-time and 959 part-time employees. No available data on volunteers |
| CSO-Government Cooperation (relevant body/ consultation mechanism) | National Council for Civil Society. National Council for European Integration. Partnership Platform for European Integration | |
| Key challenges | <ul style="list-style-type: none"> • Lack of unified and accurate data for NPOs • Ineffective VAT procedures with zero per cent for foreign funding | <p>Challenges in obtaining accurate and timely data on NPO sector</p> <p>Lack of functioning of the electronic registry for NPOS</p> <p>Ineffective VAT exemption procedures for foreign grants</p> |

Key findings

| | |
|---|--|
| 1 | <p>The absence of a fully functional and accessible electronic registry of NPOs significantly undermines the transparency, efficiency, and accountability of NPOs in Albania. Currently, NPOs face administrative burdens and delays due to paper-based registration and re-registration processes, that hinder timely updates, public access to information, and data verification.</p> |
| 2 | <p>The financial sustainability of the non-profit sector remains a major challenge, significantly affected by the lack of regulation and implementation of VAT exemption for donation/grant agreements with foreign donors, including the IPA III Program of the European Union. Despite the adoption of VAT exemption procedures in 2023 (Instruction No. 11, Official Gazette 66/2023; and Instruction No. 27, Official Gazette 137/2023), the unclear provisions rendered them impractical, hindering the operations of NPOs.</p> |
| 3 | <p>Public funding to support NPOs has been insufficient over the years to meet the needs of the groups they serve. With the reduction of foreign aid, the challenge of financial sustainability has increased, putting at risk the continuity of many services provided by the nonprofit sector and its important role in the social, economic, and democratic development of the country.</p> |
| 4 | <p>There is a clear lack of institutional commitment to meaningful civic engagement, with restricted opportunities for participation, limited access to decision-making, and a noticeable regression in state–NPOs dialogue. Engagement processes are often superficial, and NPOs have little influence on final outcomes, undermining trust and discouraging active involvement.</p> |
| 5 | <p>The Lack of government’s commitment toward the implementation of the Road Map for the Government Policy towards a More Enabling Environment for Civil Society Development, reflected in the low level of the 2019-2023 Road Map implementation and lack of an official assessment report, as well as lack of public information and engagement, along with delays in the preparation of the 2024-2027 Road Map.</p> |

Key recommendations

| | |
|---|---|
| 1 | Public authorities should take urgent measures to comply with the legal obligations for the establishment and making functional of the electronic registry of NPOs. |
| 2 | The amendment of Instructions on VAT Tax for for donation/grant agreements with donors, including the IPA III Program of the European Union, should be made effective by enabling its practical implementation, both by the NPO sector and private operators in the market. |
| 3 | The government should enhance its role as a strategic donor to the nonprofit sector by increasing public funding and ensuring predictable, long-term financial support. This should be accompanied by clear, transparent, and accountable procedures for the allocation and oversight of funds. Recognizing the sector's critical contribution to democracy, public service provision, and civic participation, such support is essential to safeguard its sustainability and autonomy. |
| 4 | The consultation mechanisms with NPO sector regarding legislative processes and EU integration agenda should be strengthening by ensuring meaningful participation and accountability. |
| 5 | The new overdue Road Map 2024–2027 should be approved following an inclusive and transparent consultative process with NPOs and relevant stakeholders, taking into account the (lack of) results from the implementation of the previous Road Map. |

Findings

Area 1: Basic Legal Guarantees of Freedoms

1.1. Freedom of association

1.1.1. Freedom to establish and participate in NPOs

The legal framework on freedom of association remained unchanged in 2024 and is in line with international standards. Registration is not mandatory, and Law No. 80/2021¹ “For the registration of nonprofit organisations” outlines a clear and timely process for written or electronic registration. The latter is not functional yet, despite the Decision of High Judicial Council No. 35, dated 26.01.2022 “On the creation and implementation of the electronic registry of non-profit organisations” which stipulated that the electronic register should become functional by 30 December 2023. According to the “Roadmap for the Functioning of Democratic Institutions”² approved in 2024, a faster and more transparent registration process through the electronic registry was to be established within the same year.

The legislation permits NPOs to network both domestically and internationally, without prior state notification.

In practice, the right to freedom of association is respected. Individuals and legal entities can freely establish a non-profit organisation and register it as an association, foundation, or centre, (the three forms recognised by law), and engage in NPO activities both online and offline. Nevertheless, the **registration process remains partially enabling**. No progress has been made in establishing and operationalising the electronic registry. Both deadlines, the first set by the Decision of High Judicial Council (30 December 2023) and the second set by the Roadmap for the Functioning of Democratic Institutions (within 2024) have expired, and the Court has not provided a date or any information in response to the request for information on this matter. The draft law “On the registration of nonprofit organisations”³ was also launched for public consultation, aiming to incorporate the changes mandated by the Constitutional Court's decision. While the draft generally reflects the Court's ruling, the issue of administrative sanctions remains a point of concern.

In the absence of the electronic register, NPO registration remains centralised in Tirana, causing delays and additional costs for NPOs located outside the capital. According to information received from the Court the average registration time **decreased slightly from 105 days in 2023 to 95 days in 2024**. However, this still

1 Official Gazette 121/2021, Law No. 80/2021 “For the Registration of Non-profit Organisations”, updated. Available at <https://qbz.gov.al/eli/ligj/2021/06/24/80/852c9af6-f25b-492e-aa48-577ff8077583>

2 Decision No. 311, dated 02.10.2024 “On the Approval of the Roadmap for the Functioning of Democratic Institutions” Available at: <https://amshc.gov.al/wp-content/uploads/2024/10/vendim-2024-10-02-611.pdf>

3 The draft law was launched for public consultation on May 2025. The information is retrieved from the public consultation platform. Available at: <https://www.konsultimipublik.gov.al/Konsultime/Detaje/832>

significantly exceeds the 15-day limit set by Law No. 80/2021. These delays are also confirmed in a survey conducted by Partners Albania with a sample of NPOs registered in 2024. Furthermore, the surveyed NPOs (33 in total) reported prolonged delays in the processing of statutory changes, ranging from a minimum of 40 days to as long as 8760 days (two years), with an average duration of approximately 150 days.

According to the Tirana Judicial District Court (the Court), there are **13,053 NPOs** in total registered, including **285 newly registered in 2024** (170 foundations, 79 centers, and 36 associations). In 2024, the Court rejected 68 requests for registration, but the information on the reasons for rejection was not provided by the Court. No sanctions have been reported against individuals or informal groups for not registering, as registration is not mandatory. According to article 36, of the Law No. 80/2021 the registration of NPOs in the electronic registry also constitutes their simultaneous registration with the General Directory of Taxation (GDT) and local tax administration, the social and health insurance scheme, and the labor inspectorate. As of 2024, the GDT reports a total of **5,745 registered NPOs**, with **208 new registrations** within this year. While the number of newly registered organisations at the Court increased from 253 in 2023 to 282 in 2024, the total number of organisations with an “active” status slightly declined from 2,257 to 2,228 NPOs, representing only 39% of the registered NPOs at the GDT. This trend suggests that although new entities are entering in the sector, a portion of existing organisations may be ceasing their operations. As result, over 60% of NPOs are inactive.

There is no restriction on NPOs joining networks and coalitions in practice, reflected in a high number of NPOs being members of different networks and coalitions in 2024. The 2024 Capacity and Needs Assessment Report⁴ by the National Resource Centre for Civil Society (NRC) shows that 76% of the 110 surveyed NPOs are members of networks and coalitions. Involvement in networks/coalitions operating at the national level remains the most widespread, with 45% of cases, followed by participation in networks/coalitions in the EU and beyond, with 24% of cases, and participation in networks/coalitions in the Western Balkans region, with 20% of cases. Meanwhile, NPOs' involvement in networks/coalitions at the local level remains low, with only 11% of cases.

1.1.2. State Interference

No legal changes occurred in 2024 regarding state interference. **The Law No. 8788/ 2001 “For nonprofit organisation” protects NPOs from state interference and ensures their autonomy in managing internal affairs.** The state is obliged to both respect and protect the right to freedom of association, including protection from third-party threats⁵.

Regarding the reporting regulation, the regulation in place takes into account the specific characteristics of NPOs. NPOs with assets or income below 5 million ALL (approx. 50,000 EUR) follow cash-based accounting and only submit a cash flow statement with explanatory notes on their activities. NPOs exceeding this threshold must provide comprehensive financial statements, including statements of financial position, activity, and cash flow⁶.

4 Partners Albania for Change and Development, 2025, “Capacity and Needs Assessment of Civil Society Organisation in Albania, 2024”. Available at: <https://resourcecentre.al/publication/capacity-and-needs-assessment-of-civil-society-organisations-in-albania-2024/>

⁵ Official Gazette 28/2001, Law No. 8788, dated 07.05.2001 “For the Nonprofit Organisations”, updated. Available at: <https://qbz.gov.al/eli/ligi/2001/05/07/8788>

⁶ National Accountability Council, (2018), “National Standards for NPOs Accountability”. Available at: <https://kkk.gov.al/udhezuesi-per->

In June 2024, was approved the “National Strategy for the Prevention of Money Laundering and Terrorist Financing 2024-2030”, and its Action Plan 2024 - 2027.⁷ The strategy aims to contribute to the development of a safe and sound financial system that supports a dynamic economy by improving and modernising mechanisms to combat money laundering and terrorist financing. It seeks to strengthen the efforts of Albanian authorities to prevent criminal elements and threats to national security from infiltrating the financial system and to ensure accountability for the harm they cause. The key priorities addressed by the strategy are (i) improving the regulatory framework and enhancing inter-institutional coordination; (ii) increasing the effectiveness of the preventive system; (iii) strengthening the operational efficiency of law enforcement and other relevant agencies in the fight against money laundering and terrorist financing; and (iv) leveraging technological innovations while mitigating associated risks.

In December 2024 the “Strategy for public education on the risks posed by money laundering and terrorist financing in our society” was published, including its Action Plan.⁸ The objectives of the strategy are raising public awareness of the risks posed by money laundering and terrorist financing; education that pupils and students should receive during their academic education; ensuring ongoing training for investigators, prosecutors, judges, and other key actors involved in the identification and prosecution of such cases. The strategy also seeks to build the capacities of the business community, through cooperation with the National Chamber of Commerce, and public administration, through the Albanian School of Public Administration, to identify suspicious financial activities and effectively use educational tools such as brochures and guides as prevention efforts. It is to be noted that although the strategy was approved in December 2024, most of the measures in the action plan were scheduled for implementation as early as April and June 2024.

Regarding NPOs, the Albanian Financial Intelligence Agency (AIF) published the “Guideline for Nonprofit Organisations on the Financing of Terrorism”⁹ to assist NPOs in understanding terrorist financing risks, legal obligations, preventive measures, and international best practices in the fight against financing of terrorism through NPOs. This guide represents a key outcome of advocacy efforts by Partners Albania aimed at fostering an enabling environment and preventing abuse of NPOs for money laundering or terrorist financing purposes. AIF reported that the guideline was consulted with 300 NPOs via email and through its website, but no public information is available regarding which NPOs were consulted or the methodology used for their selection. Partners Albania, one of the few organisations engaged with AML/CFT issue and the one that developed the Terrorist Financing Risk Assessment Methodology for the NPO Sector in Albania was not invited to participate in this consultation process. The fact that the guideline was not subject to public consultation is evident in its content, which appears more like a direct translation of the FATF manual than a reflection of the national context.

The National Risk Assessment Report, published by the FIU in December 2023, concluded that the risk of terrorist financing (TF) in the NPO sector is low. However, no steps have yet been taken by public authorities to

[hartimin-e-raportit-jofinanciar/](#)

⁷ Coordination Committee for the Fight Against Money Laundering, 2024, Decision No. 1, date 24.07.2024 “National Strategy for the Prevention of Money Laundering and Terrorist Financing 2024-2030”. Available at: <https://fiu.gov.al/wp-content/uploads/2025/01/Strategjia-Kombetare-per-Parandalimin-e-Pastrimit-te-Parave-2024-2030-dhe-Plani-i-Veprimit.pdf>

⁸ “Strategy for public education on the risks posed by money laundering and terrorist financing in our society”. Available at: <https://www.drejtesia.gov.al/wp-content/uploads/2025/01/Strategjia-per-edukim-e-publikut-per-rreziqet-e-PP-FT-2024-2027-FINAL-19.12.2024.pdf>

⁹ Albanian Financial Intelligence Agency, 2024, “Udhëzues për Organizatat Jofitimprurëse mbi Financimin e Terrorizmit”. Available at: <https://bit.ly/3PTGyEw>

amend the AML/CFT legislation, which continues to classify NPO sector as high-risk. As a result, second-tier banks are required to apply enhanced due diligence measures to NPOs, including verifying the purpose of transactions, the nature of the business relationship, and the identity of the ultimate beneficiary, among other factors.

In practice, instances of terrorist financing involving nonprofit organisations are exceedingly rare. In 2024, the AIF received only one suspicious activity report¹⁰ related to an NPO from a reporting entity (a bank). Following assessment, the AIF has referred the case to the relevant authorities for further actions.

There were no changes in the legal framework related to NPO dissolution in 2024. Law No. 80/2021 “On the registration of nonprofit organisations” stipulates the relevant provisions. NPOs may be dissolved voluntarily or by Court order in cases of constitutional violations, illegal activity, or insolvency. Whether dissolution is initiated by the NPO itself or mandated by the court, deregistration can only occur through a final and binding court decision, following the submission of the final liquidation report by the GDT. In 2024, the Court approved 24 liquidation and deregistration cases.

1.1.3. Access to financial resources

No legal changes occurred in 2024 regarding access to financial resources. **NPOs are allowed to seek funding from domestic and foreign sources, both public or private, including grants, and donations.** The legal framework also permits NPOs to generate income through economic activities within a defined income threshold of 20% from the total income. NPOs may also apply for “social enterprise” status, and upon approval, may apply to benefit a grant from the “Fund for Social Enterprises”.

According to Albania 2024 Report of European Commission, “*the legal framework is only partially promoting access to funding*”¹¹. According to the report, the recently introduced VAT exemption has proven ineffective. Moreover, the absence of individual donation incentives and the limited scope of corporate tax benefits further restrict philanthropic contributions. Combined with insufficient public support, these issues compromise the financial resilience of civil society and social enterprises (see Area 2 for more information).

In practice, NPOs receive funding from a variety of sources. According to the 2024 Capacity and Needs Assessment Report by NRC, 67% from the 110 surveyed NPOs reported *foreign government and donor grants or contracts* as their primary source of income, followed by *grants or sub-grants from international and local nonprofit organisations operating in Albania* (45%), and *funding from the European Union* (40%). *Income from economic activities* was reported by 20% of NPOs¹². As of August 2024, the Ministry of Health and Social Protection reported that 12 NPOs had been granted “social enterprise” status,¹³ and two of them has received

¹⁰ Based on the response provided by the Albanian Financial Intelligence Agency to the request for information submitted by Partners Albania

¹¹ European Commission, 2024, “Albania Annual Report 2024”. Available at: https://enlargement.ec.europa.eu/document/download/a8eec3f9-b2ec-4cb1-8748-9058854dbc68_en?filename=Albania%20Report%202024.pdf

¹² Partners Albania for Change and Development, 2025, “Capacity and Needs Assessment of Civil Society Organisation in Albania, 2024”. Available at: <https://resourcecentre.al/publication/capacity-and-needs-assessment-of-civil-society-organisations-in-albania-2024/>

¹³ Partners Albania for Change and Development, (2024), “Dua Partner Albania Newsletter”, Available at: https://us5.campaign-archive.com/?e=test_email_&u=a1424fae50005c4af8fca014f&id=ce110b6eed

a total of 9.3 million ALL (approx. 94,350 EUR) in public funding from the Fund for Social Entreprises for the 2024–2025 period.

With regards to annual budget, according to the 2024 Capacity and Needs Assessment Report by NRC, the majority of NPOs (33.6% out of 110 NPOs surveyed) operate with relatively limited annual budgets ranging from 20,001 to 100,000 EUR. Higher-funded organisations are rare, with only 0.9% having annual budgets between 700,001 and 1,000,000 EUR, and all of them located in Tirana¹⁴.

1.2. Related freedoms

1.2.1. Freedom of Peaceful Assembly

The legal framework on peaceful assembly remained unchanged in 2024. It protects the right to assemble without discrimination and does not require prior authorisation, only notification. Authorities are obliged to safeguard participants, but the legal grounds for appealing against assemblies remain vague and open to broad interpretation.

In practice, peaceful assemblies do not require prior authorisation but only notification, as demonstrated by the 17 notices submitted by NPOs to the State Police in 2024.¹⁵ These assemblies addressed a range of the following issues:

- Concerns about local government services in communities.
- Protests against gender-based violence on the “International Day for Women’s Rights”.
- Environmental protection efforts, such as preserving the Vlora River’s water resources, and protecting pastureland.

According to the same response from State Police, there were no cases of restrictions or bans on assemblies organised by NPOs, no instances of dispersal, and no detention of participants. The People’s Ombudsperson reported that no complaints were filed by NPOs in 2024 regarding bans or restrictions on assemblies they organized.

Journalists and media are allowed to participate in peaceful assemblies. There were no major restrictions noted to media access, or challenges faced by journalists when reporting during assemblies in 2024.

1.2.2. Freedom of Expression

Freedom of expression is a constitutional right in Albania, and the legal framework guarantees this right to all individuals. NPOs engaged in the promotion of human rights and democracy are allowed to speak freely and carry out advocacy activities.

¹⁴ Partners Albania for Change and Development, 2025, “Capacity and Needs Assessment of Civil Society Organisation in Albania, 2024”. Available at: <https://resourcecentre.al/publication/capacity-and-needs-assessment-of-civil-society-organisations-in-albania-2024/>

¹⁵ The information is received from the request for information that Partners Albania submitted to the Albanian State Police.

With regards to disinformation, in April 2024, the Parliament established an ad hoc parliamentary committee on tackling disinformation and foreign interference, referred to as the Special Disinformation Committee,¹⁶ following the signing of a Memorandum of Understanding between the Albanian and U.S. governments during Secretary Blinken's visit¹⁷. The committee's mandate includes reviewing the legal framework and institutional practices to prevent foreign interference in democratic and electoral processes, strengthening national security measures, addressing threats in the economy and other critical sectors, and promoting freedom of expression, media freedom and pluralism (both online and offline), access to information, and public engagement against disinformation. While the committee aims to counter foreign influence, concerns have been raised by civil society actors that the focus on external threats may overshadow the challenges posed by domestic disinformation and could risk restricting legitimate dissent and freedom of expression if not accompanied by proper safeguards.¹⁸ As noted in the European Commission's 2024 Report on Albania, it is essential that the committee ensures any legislative proposals remain fully in line with the EU acquis and European standards on freedom of expression.¹⁹ On March 2025, the committee convened to discuss the extension of its mandate. In parallel, the draft National Strategy Against Foreign Interference and Disinformation 2025–2030 and its implementation roadmap were made available for public consultation²⁰. The consultation process remains open for continued input, and any future legal amendments are expected to be undertaken only after broad public consultation and the formation of the new Parliament following the parliamentary elections on May 2025. Effective coordination with the ongoing structured dialogue on media is also considered necessary for successful implementation.

Defamation remains a criminal offense punishable by fines.

There is currently no specific regulation or mechanism in place to address Strategic Lawsuits Against Public Participation (SLAPPs). On February 2024, the European Parliament adopted the Anti-SLAPP Directive, introducing procedural safeguards in cross-border civil proceedings within EU Member States. The Directive aims to protect public watchdogs, human rights defenders, journalists, and other actors from abusive litigation in the form of SLAPPs. Following this development, in October 2024, Decision of the Council of Ministers (DCM) No. 621, dated 10.10.2024, was approved, endorsing the policy document "National Reform Agenda 2024–2027" within the framework of the European Union's "Reform and Growth Facility for the Western Balkans". The agenda foresees the adoption of amendments to the national legal framework on anti-SLAPP measures, aligning with the standards of the Council of Europe/Venice Commission and the EU acquis. These amendments are to be developed through a structured and inclusive dialogue with media and civil society actors and approved by June 2027.²¹

¹⁶ The information is retrieved from the official website of the Albanian Parliament. Available at: <https://parlament.al/struktura/8e230ff7-5344-45fb-bd6c-510f927c6b92>

¹⁷ The information is retrieved from the Mission of the Republic of Albania to the European Union. Available at: <https://arkiva.ambasadat.gov.al/european-union/sq/vizita-n%C3%AB-tiran%C3%AB-ministri-hasani-dhe-sekretari-amerikan-blinken-firmosin-marr%C3%ABveshjet>

¹⁸ The information is retrieved from FAKTOJE Organisation. Available at: <https://faktoje.al/komisioni-per-dezinformimin-geveria-nuk-u-konsultua-me-nderkombetaret/> The information is retrieved from the SCIDEV organisations. Available at: <https://scidevcenter.org/2024/04/05/scidev-statement-regarding-the-special-parliamentary-committee-on-disinformation/>

¹⁹ European Commission, 2024, "Albania Annual Report 2024". Available at: https://enlargement.ec.europa.eu/document/download/a8eec3f9-b2ec-4cb1-8748-9058854dbc68_en?filename=Albania%20Report%202024.pdf

²⁰ The information is retrieved from the Albanian Telegraphic Agency. Available at: <https://ata.gov.al/2025/02/11/brace-konsultim-publik-per-strategji-ne-kombetare-kunder-nderhyrjeve-te-huaja-dhe-dezinformimit/>

²¹ Official Gazette 198/ 2024 DECISION No. 621, dated 10.10.2024 "on the approval of the policy document "National Reform Agenda 2024–

In addition, a new initiative titled *"Promoting Freedom of Expression in Albania through Open Dialogue"* has been launched in partnership with the Department of Journalism and Communication at the University of Tirana. As part of this initiative, a **Structured Dialogue on Media Working Group** is being established to promote media freedom and accountability by fostering inclusive dialogue among public institutions, media professionals, and civil society actors. The working group focuses on addressing key challenges such as journalist safety and media self-regulation, identifying practical measures to counter threats including physical attacks, legal pressure, and digital harassment. It also explores mechanisms to strengthen ethical standards and editorial independence. Through expert input and stakeholder consultations, the working group aims to support legal and policy reforms aligned with EU and Council of Europe standards, contributing to a more resilient, independent, and pluralistic media landscape in Albania.²²

In practice, the use of SLAPPs has shown a concerning increase, with reported cases rising from 42 in 2022 to 73 in 2023.²³ According to the 2024 Global Expression Report,²⁴ Albania is ranked at 66th position globally, placing it among the less restrictive countries in terms of freedom of expression.

1.2.3. Open, safe, and secure civic spaces

In 2024, the Law No. 25/2024 "On Cybersecurity" was passed, aiming to strengthen the protection of critical digital infrastructure. The law requires public and private operators in key sectors to register with the National Authority for Cybersecurity, establish internal incident response teams, implement risk management measures, and report major cybersecurity incidents. The Authority is responsible for overseeing enforcement and has the power to impose administrative fines or initiate criminal proceedings in cases of non-compliance. In addition, the updated **National Security Strategy 2023–2028**²⁵ explicitly addresses disinformation, cyber-attacks, and malicious influence operations intended to destabilize Albania's political system and manipulate the public opinion.

In December, the government announced its intention to impose a one-year ban on TikTok, citing concerns over the platform's role in promoting youth violence following a fatal incident which involved teenagers. The decision was formally approved and implemented shortly thereafter²⁶. It sparked debates over freedom of expression, with critics arguing that it could suppress political discourse and hinder online campaigning ahead of the 2025 elections.²⁷

2027", within the framework of the European Union instrument "Reform and Growth Facility for the Western Balkans". Available at: <https://qbz.gov.al/share/2JGelQYcTH-1hZJ34UeMdw>

²² The information is retrieved from the Council of Europe website. Available at: <https://www.coe.int/en/web/tirana/-/launch-of-the-open-dialogue-on-freedom-of-expression-in-albania-2>

²³ European Commission, 2024, "Albania Annual Report 2024". Available at: https://enlargement.ec.europa.eu/document/download/a8eec3f9-b2ec-4cb1-8748-9058854dbc68_en?filename=Albania%20Report%202024.pdf

²⁴ Article 19, 2024, "The state of the state of freedom of expression around the world". Available at: <https://www.globalexpressionreport.org/>

²⁵ <https://www.mod.gov.al/images/PDF/2024/SSK-NSS-english.pdf>

²⁶ Official Gazette 47/2025 "DECISION No. 151, dated 6.3.2025 "ON TAKING TEMPORARY MEASURES TO AVOID NEGATIVE IMPACTS OF THE ONLINE PLATFORM "TIKTOK"", Available at: <https://www.qbz.gov.al/eli/vendim/2025/03/06/151/3585db2a-e5ab-4646-b4aa-d3f91bb1b84e>

²⁷ Bogdani, N., "Albanian TikTok Shutdown Tool Raises Privacy Concerns", Available at: <https://balkaninsight.com/2025/04/08/albanian-tiktok-shutdown-tool-raises-privacy-concerns/>; SCIDEV, 2025, "SCIDEV's statement regarding the decision to block access to TikTok in Albania for one year". Available at: <https://scidevcenter.org/2024/12/23/scidevs-statement-regarding-the-decision-to-block-access-to-tiktok-in-albania-for-one-year/>

In practice, as reported by multiple sources²⁸, Albania's online environment has been increasingly affected by disinformation campaigns, cyber threats, and foreign information manipulation, particularly originating from Russia, which pose growing threats to democratic values and the rules-based international order. Despite the ongoing efforts of media monitoring organisations and civil society actors, resilient disinformation networks continue to spread false narratives and conduct smear campaigns, largely unaffected by fact-checking initiatives²⁹. This has eroded public trust and highlighted the urgent need for more robust and coordinated institutional responses to digital disinformation.

Area 2: Framework for NPO Financial Viability and Sustainability

2.1. Tax/fiscal treatment for NPOs and their donors

2.1.1. Tax Benefits

The financial sustainability of the NPOs in Albania remains critically challenged by the failure to implement VAT exemption for donation/grant agreements with foreign donors.

The State Agency for Strategic Programming and Aid Coordination (SASPAC) is the designated authority for registering donor-funded projects for VAT exemption. Implementing organisations/beneficiaries must submit a written request along with the project approval act and other required documentation. If complete, SASPAC issues a Project Registration Certificate within five days and forwards it to the Tax and Customs Directorates. In cases of missing or incomplete documentation, applicants are given 10 days to submit corrections.

Although the exemption procedures were formalised in 2023 through Instruction No. 11 (Official Gazette 66/2023) and Instruction No. 27 (Official Gazette 137/2023), vague and impractical provisions have rendered them ineffective. One of the most burdensome requirements is the obligation to sign and notarize individual contracts with every supplier before making any purchase. Given that most projects involve 50 to 75 suppliers, often for minor expenses such as office supplies or local services, this condition is logistically unmanageable and economically unjustifiable. The cost and administrative burden often exceed the value of the procured goods or services. Moreover, no mechanism has been established to reimburse VAT accrued since the entry into force of Instruction No. 11 in April 2023, further threatening the sector's financial viability. In response to these issues, Partners Albania submitted two formal letters³⁰ and engaged in meetings with the relevant

²⁸ Faktoje.al., 2025, Available at: <https://www.facebook.com/photo?fbid=1131948168944017&set=a.1131973235608177>; Rrjetit Ballkanik për Gazetarinë Investigative në Shqipëri (BIRN Albania) dhe Qendrës së Shkencës dhe Inovacionit për Zhvillim (SCIDEV), Available at: <https://disinfo.al/>; SCIDEV, 2025, "Key Findings from the Study on Foreign Information Manipulation and Interference (FIMI) Threats in Albania". Available at: <https://scidevcenter.org/2025/01/06/key-findings-from-the-study-on-foreign-information-manipulation-and-interference-fimi-threats-in-albania/>

²⁹ National Cyber Security Authority of Albania (NCSA), 2024 "Global Cyber Policies Dialogues: Western Balkans – Meeting Summary". Available at: https://static1.squarespace.com/static/5ca0ec9b809d8e4c67c27b3a/t/67bcb7dac417180ef4682dbf/1740421083936/Meeting+Summary+W estern+Balkans+Cyber+Policy+Dialogue+Nov+2024+Final_web.pdf

³⁰ Partners Albania for Change and Development, 2024, "Comments and Recommendations addressed to the responsible institutions for the implementation of Instruction No. 27, dated 13.09.2023 "For some additions and changes to Instruction No. 6, dated 30.01.2015 "For the Added

authorities, outlining key concerns and proposing practical solutions. The VAT-related challenges were also raised during the December 2024 meeting of the National Council for Civil Society.

Acknowledging these challenges, SASPAC and other involved institutions have agreed to revise the procedures to address the issues raised by the NPO sector. These changes are expected to be approved in 2025³¹. Partners Albania will monitor the implementation of the procedure.

In practice, the VAT exemption for donation/grant agreements with foreign donors has never been implemented. Even the few certificates issued to NPOs were not utilized, as the system did not support their practical application. Meanwhile, VAT reimbursement under the IPA II Programme has continued, with four reimbursements processed in 2024. As for other tax benefits, no legal changes happened in 2024, and developments reflect the previous MM reports.

2.1.2. Incentives for giving

The legal environment on giving remains restrictive, as no tax incentives exist for individual donations, and only marginal incentives are available for corporate contributions. Regarding online ‘crowdfunding’ platforms, legislation does not explicitly address fundraising through digital technologies, nor does it expressly forbid it.

An analysis of legislation related to more favourable tax incentives for individual and corporate donations to be conducted by 2025 is planned in the Roadmap for the Functioning of Democratic Institutions. Also, the Roadmap stipulates the approval of the law on sponsorship within 2027³².

In practice, NPOs can freely receive funding from different private sources, and do not face complicated procedures to access the funding. They can also apply for donations at crowdfunding platforms to generate incomes from individual and business entities. The only local crowdfunding platform in Albania to support the activities of NPOs is Smile.al created by Credins Bank in partnership with Partners Albania for Change and Development, Vodafone Albania Foundation, Grant Thornton Albania, American Bank of Investment and implemented by the Credins Foundation.

During 2024, 13 community actions by NPOs are supported³³ in the Smile.al platform. There is no regulation or public institutions requesting any documents from NPOs for their activities on crowdfunding platforms, other than those requested in routine audits.

The 2024 Capacity and Needs Assessment Report published by NRC³⁴ shows a significant increase of NPO-Business collaboration, with 56% of NPOs stating to have had collaborations with the private sector. Most of these NPOs are based in Tirana, and only 25% of cooperation cases happens between businesses and NPOs

Value Tax in the Republic of Albania” Available at: bit.ly/3SgRfQg

³¹ Official Gazette 42/2025, Instruction No. 6, dated 24.02.2025 “For some changes and additions in the Instruction No. 6, dated 30.01.2015 “For the Added Value Tax in the Republic of Albania”. Available at: <https://www.qbz.gov.al/eli/udhezim/2025/02/24/6/881f2f7f-dbff-4649-87f2-071202427f12>

³² Decision No. 311, dated 02.10.2024 “On the Approval of the Roadmap for the Functioning of Democratic Institutions” Available at: <https://amshc.gov.al/wp-content/uploads/2024/10/vendim-2024-10-02-611.pdf>

³³ The information is retrieved from the webpage of Smile.al platform. Available at: <https://smile.al/projekte-per-te-dhuruar/>
<https://smile.al/projekte-te-mbeshtetura/>

³⁴ Partners Albania for Change and Development, 2025, “Philanthropy magazine”. Available at: <https://bit.ly/430ju8I>

placed outside the capital with a wide geographical distribution such as Shkodra, Vlora, Durrësi, Elbasani, Korça, and smaller cities such as Fushë-Arrëzi, Vau i Dejës, Bulqiza, Fushë Kruja, Përmeti, Puka, Pogradeci, Lezha, and Orikumi³⁵.

2.2. State support

2.2.1. Public funding availability

No legal changes regarding public funding to NPOs have occurred in 2024. Law No. 10093/2009, *“On the Establishment and Functioning of the Agency for the Support of Civil Society”*³⁶, includes provisions that regulate state support for institutional development of NPOs, project-based funding, and co-financing of EU-funded projects. The Agency for the Support of Civil Society (ASCS) serves as the national mechanism for the distribution of public funds to NPOs. In addition, other public institutions provided grants to NPOs in 2024. The tables below provide a list of state agencies at central and local levels and the respective funds granted by them, based on the information provided as a response to Partners Albania’ request for information and the information published on the institutions’ website.

Table 1: Public funding from public institutions at the central level for 2024.

| Institution | Number of calls for proposals | Total applications submitted | Awarded NPOs | Minimum and maximum amount per grant | Total Amount distributed FY 2024 |
|---|-------------------------------|------------------------------|------------------|---|--|
| The ASCS | 1 | 150 | 73 | Max.: 2 million ALL (approx. 20,000 EUR) | 96.5 million ALL (approx. 965,000 EUR) |
| The Ministry of Tourism and Environment | 1 | 35 ³⁷ | 25 | N/A | 70,790,000 ALL (approx. 707,900 EUR) |
| The Ministry of Economy, Culture and Innovation | 1 | 555 ³⁸ | 201 | Min.: 200,000 ALL (approx. 2,000 EUR) Max.: 3,200,000 ALL (approx. 32,000 EUR) | 122,317,600 ALL (approx. 1.22 million EUR) |
| The National Youth Agency ³⁹ | 1 | 116 | 26 ⁴⁰ | Min: 1,500,000 ALL (approx. 15,000 EUR) | 70,000,000 ALL |

³⁵ Partners Albania for Change and Development, 2025, *“Capacity and Needs Assessment of Civil Society Organisation in Albania, 2024”*.

Available at: <https://resourcecentre.al/publication/capacity-and-needs-assessment-of-civil-society-organisations-in-albania-2024/>

³⁶ Law No. 10093, “On the Establishment and Functioning of the Agency for the Support of Civil Society”. Available at: <https://amshc.gov.al/wp-content/uploads/2024/08/ligi-2009-03-09-10093-1.pdf>

³⁷ The information is retrieved from the Ministry of Tourism and Environment and through the response provided by the request for information submitted by Partners Albania. Available at: <https://turizmi.gov.al/10264-2/>

³⁸ The information is retrieved from the Ministry of Economy, Culture and Innovation. Available at: <https://meki.gov.al/newsroom/lista-e-projekteve-te-miratuara-per-thirrjen-e-projekteve-kulturore-art-dhe-trashegimi-2024/>

³⁹ The information is retrieved from the National Youth Agency website. Available at: <https://rinia.gov.al/wp-content/uploads/2024/03/Projektet-fituese-te-thirrjes-se-3-per-organizatat.pdf>

⁴⁰ The information is provided through the response provided to request for information submitted by Partners Albania and retrieved from the

| | | | | | |
|--|--|--|--|--|-----------------------|
| | | | | Max: 3,500,000 ALL (approx. 35,000 EUR) | (approx. 700,000 EUR) |
|--|--|--|--|--|-----------------------|

The annual state budget includes an allocation for civil society, which is managed by the ASCS, but also covers the agency's own operational costs. As a result, it is difficult to clearly distinguish the amount specifically allocated for financial support to NPOs. According to the ASCS law, state funding for the agency should increase by 2% annually; however, for 2024, the budget saw only a 1% increase.⁴¹ As in previous years, the ASCS did not provide any institutional or co-financing support in 2024.

Regarding free legal aid services, nonprofit organisations authorized by the Ministry of Justice are eligible for state funding to provide primary legal aid. According to DCM No. 55, dated 6 February 2019, *"On defining the procedures and documentation for the authorization of nonprofit organizations that provide primary legal aid guaranteed by the state,"* this authorization is valid for a period of two years. In 2022, 15 NPOs were authorized, with their mandates set to expire in September 2024. Due to the expiration date falling before the end of the potential funding period, the Ministry decided not to open a new call for applications at the beginning of 2024. To address this issue, the Free Legal Aid Directorate proposed the amendment of DCM no. 55, dated 6 February 2019 to allow for indefinite authorization, and to postpone the new funding call until after the amended enters into force, ensuring legal compliance and continuity of services. This proposal was included in the 2025 Legislative Drafting Program for the first quarter. The amendment is expected to be approved in 2025. As a result, no funding was provided to NPOs in 2024 for the provision of free legal aid.

Table 2: Public funding from public institutions at the local level for 2024.

| Municipality | Number of calls for proposals | Total applications submitted | Awarded NPOs | Minimum and maximum amount per grant | Total Amount distributed FY 2024 |
|--------------|-------------------------------|------------------------------|--------------|--|---|
| Belsh | N/A | 2 | 2 | Min.: 200,000 ALL (approx. 2,000 EUR) Max.: 323,000 ALL (approx. 3,250 EUR) | 523,000 ALL (approx. 5,230 EUR) |
| Patos | 1 | 15 | 3 | N/A | 3,737,000 ALL (approx. 37,500 EUR) |
| Shkodër | 2 | N/A | 24 | N/A | 59,600,000 ALL (approx. 596,000 EUR) |
| Lezhë | 1 | 5 | 2 | Min.: 1,000,000 ALL (approx. 10,000 EUR) | 3,795,100 ALL (approx. 38,000 EUR) |

National Youth Agency website. Available at: https://rinia.gov.al/wp-content/uploads/2024/08/Projektet_Fituese_Thirrja_IV_per_Organizatat_2024.pdf

⁴¹The information is retrieved from the Ministry of Finance website. Available at: <https://financa.gov.al/wp-content/uploads/2024/10/Tabela-1-Buxheti-2025-institucionet-me-programe-dhe-shpenzimet-e-tjera-1.xls>

| | | | | | |
|-----------------|-----|-------------------|---|---|--|
| | | | | Max.:2,000,000 ALL (approx. 20,000 EUR) | |
| Kamëz | 2 | 15 | 1 | Min.: 700,000 ALL (approx. 7,000 EUR) Max.:1,500,000 ALL (approx. 15,000 EUR) | 1,999,625.00 ALL (approx. 20,000 EUR) |
| Tepelenë | 1 | No information | 1 | 5,100,000 ALL | 5,100,000 ALL (approx. 51,100 EUR) |
| Kukës | 1 | 15 | 3 | Min.: 1,000,000 ALL (approx. 10,000 EUR) Max.:2,000,000 ALL (approx. 20,000 EUR) | 870,909 ALL (approx. 8710 EUR) |
| Përmet | 1 | 4 | 3 | Min.: 1,000,000 ALL (approx. 10,000 EUR) Max.:2,000,000 ALL (approx. 20,000 EUR) | 5,250,000 ALL (approx. 52,500 EUR) |
| Mat | N/A | 1 | 1 | 480,000 ALL (approx. 4,800 EUR) | 480,000 ALL (approx. 4,800 EUR) |
| Gramsh | N/A | 3 | 3 | N/A | 300,000 ALL (approx. 3,000 EUR) |
| Elbasan | N/A | 1 | 1 | N/A | 150,000 ALL (approx. 1,500 EUR) |

It is worth noting that the funds administered by municipalities come from both their budgets and foreign donors, as part of programs such as the Regional Programme on Local Democracy in Western Balkans (ReLOaD) which is implemented by the UNDP and funded by EU. Although determining the exact percentage is not possible from information available to the public.

In practice, available public funding is limited and does not respond to the needs of NPOs. According to the 2024 Capacity and Needs Assessment Report by NRC, only 23 out of 110 surveyed NPOs (20%) received funding from the central government (including grants distributed by ASCS) and only 20 NPOs (18%) received funding from municipalities.⁴²

2.2.2. Public Funding Distribution

The Roadmap for the Functioning of Democratic Institutions includes the establishment of a legal, political, and institutional framework aligned with international standards to promote civic space and support NPOs. It also includes the improvement of administrative procedures for the management of all public funds, including those managed by the National Agency for the Support Civil Society, by the end of 2025; increase of public funding

⁴² Partners Albania for Change and Development, 2025, "Capacity and Needs Assessment of Civil Society Organisation in Albania, 2024". Available at: <https://resourcecentre.al/publication/capacity-and-needs-assessment-of-civil-society-organisations-in-albania-2024/>

as of 2026 to enable NPOs to effectively fulfil their role as service providers; and full functionality of the online platform for monitoring the grants process within 2025.

In practice, the announcement of the grant procedure is published by public institutions, and it provides for sufficient time to prepare and submit project proposals and all required accompanying documents. ASCS and the National Youth Agency also organize informative sessions to support potential applicants. At the local level, greater transparency is observed in municipalities applying the Reinforcement of Local Democracy Project (LOD) methodology of the ReLOaD project.

However, a regression has been noted regarding the transparency of funded projects. Unlike in previous years, ASCS did not publish the list of awarded projects on the webpage related to the call for proposals. They have not fulfilled the legal obligation to publish the list. Moreover, they did not send it even upon the request for information submitted by Partners Albania. In response to the request for information by Partners Albania, the institution only provided general data, such as the total number of projects and total funding per priority area, without disclosing beneficiary names or specific project details, such as the amounts provided and the goals and activities of the supported projects. While reviewing its official website, there is a decision No. 2, dated 23.04.2024, where there has been published the list of the awarded winners.⁴³

The same issues remain also for other central institutions that have published awarded projects, but the information lacks sufficient details. For example, the Ministry of Tourism and Environment, and the Ministry of Economy, Culture, and Innovation published only the names of recipient organisations and project titles, without including financial amounts, goals, or main activities. The National Youth Agency publishes the title of the project and the amount of funding per project, but not the name of the beneficiary organisations. On the other hand, municipalities that have implemented the LOD methodology have published the information on their website about the awarded beneficiaries and the respective amount provided.

2.2.3. Public Funding Accountability

The legal framework on public funding accountability, including monitoring and evaluation remains unchanged, as reported in the MM Report 2023.

In practice, based on the information provided by ASCS, the institution conducts continuous monitoring of each funded project, covering both narrative and financial aspects, with the aim of assessing the level of achievement for each initiative. However, **regular evaluations of the effects or impact of public funding, as well as assessments conducted by state bodies, are not made publicly available.**

2.2.4. Non-Financial Support

The Decision of the Council of Ministers No. 621, dated 10.10.2024 “On the approval of the policy document “National Reform Agenda 2024–2027”, within the framework of the European Union instrument “Facility for

⁴³ Agency for the Support of Civil Society, 2024, Decision No. 02, dated 23.04.2024 “For the approval of project proposal, call for proposals 17 and the funding amounts. Available at: <https://amshc.gov.al/wp-content/uploads/2024/11/Vendimi-Nr.-2-I-Bordit-Mbikqyres-2024.pdf>

Reforms and Growth for the Western Balkans”⁴⁴ stipulates that by the end of 2026, around 50% of the number and value of confiscated assets are reused, including social reused, within 6 months of confiscation.

The Law No. 139/2015 "On Local Self-Government", amended⁴⁵ allows the granting of public properties free of charge to be used by third parties, through the approval of the Municipal Council.

The Agency for the Administration of Seized and Confiscated Assets (AASCA), based on the Decision No. 632, dated 23.07.2010, "On determining the evaluation criteria, methods, and procedures for the commissioning and alienation of confiscated assets", may allocate confiscated assets from criminal activity and high-level corruption to NPOs for social re-use for the protection and rehabilitation of victims of organized crime. Nonprofit organisations may apply to use confiscated assets by submitting a formal request to the Agency for the Administration of Seized and Confiscated Assets (AAPSK), including a project proposal outlining the intended social use, implementation plan, and sustainability. The AAPSK reviews the request and forwards eligible proposals for final approval to the Interministerial Committee for Measures Against Organized Crime, which is the competent authority to decide on the allocation of confiscated assets.

In practice, **the non-financial support by municipalities is provided through the request submitted by NPOs to local authorities.** When receiving it, in terms of assets free of charge the decision is taken upon the approval of the municipal council. At the local level, 16 out of the 35 municipalities⁴⁶ that responded to Partners Albania's request for information have provided non-financial support, including rent-free premises, logistical support for cultural activities, and assistance through municipal staff.

In addition to municipal-level support, national mechanisms such as the National Lottery Fund previously played a supportive role in financing nonprofit initiatives. This fund served as a potential source of public funding for NPOs. However, this form of support is no longer available, as the legal framework regulating the National Lottery is no longer in force, further limiting the range of public funding opportunities accessible to NPOs.

2.3. Human capital

2.3.1. Employment in NPOs

The Albanian Parliament has approved the Law No. 91/2024 on “Some amendments to the Law No. 7961 date 12.07.1995 “the Labor Code of the Republic of Albania”.”⁴⁷ These amendments align with recent changes in employment practices within the European Union following the pandemic, aiming to promote more efficient labor market policies. Notable changes include an increase in the number of annual leave days and greater flexibility in the use of paid leave. These changes are applicable for the employees working in the NPO sector, too.

⁴⁴ The information is retrieved from the Ministry of Justice. Available at: <https://www.drejtesia.gov.al/wp-content/uploads/2024/11/Dokument-Politik-Agjenda-Kombetare-e-Reformave-2024-2027.pdf>

⁴⁵ Official Gazette 249/2015, Law No. 139/2015 “On local self-government”, article 54, letter e/1. Available at: <https://qbz.gov.al/eli/ligj/2015/12/17/139>

⁴⁶ Bulqizë, Kamëz, Shkodër, Pukë, Lezhë, Devoll, Tepelenë, Përmet, Dibër, Pustec, Belsh, Mat, Durrës, Vlora, Kolonja and Kurbin.

⁴⁷ Law No. 7961 date 12.07.1995 “Labor Code of the Republic of Albania”, amended, Available at: <https://www.qbz.gov.al/preview/c1c18a6c-5f3e-457d-b931-de505b3c7ed0>

According to the information received from the GDT⁴⁸, there are **9,875 employees working** in the NPO in 2024, out of which **8,916 (90%) employed full-time** and **959 (10%) part-time**. Compared to the previous year, this represents a **decrease of approximately 1,000 employees** in the sector. This significant decline cannot be explained solely by the slight decrease in the number of active NPOs, 2,257 in 2023 to 2,228 in 2024, but rather points to a broader impact of the financial difficulties faced by these organisations. These economic challenges may have directly affected the capacity of CSOs to retain or expand their staff, thus reflecting a concerning trend for the sector's sustainability.

2.3.2. Volunteering in NPOs

In November, the Minister of State for Youth and Children launched the public consultation on the Draft Law "On Volunteering"⁴⁹. **The draft law comes in response to the long-standing efforts of civil society to improve the legal framework for volunteering in the country, considering that the existing law, although adopted years ago (2016), has not been implemented and has instead become a burden for NPOs and informal groups, hindering their activities.**

While the draft intends to promote an enabling environment for volunteering, the NRC and several organisations have raised concerns on several problematic provisions, like among others, lacking a clear and appropriate definition of volunteering as a public service, separate from employment. This omission risks repeating past implementation challenges, where volunteering was mistakenly treated as a form of employment, leading to tax and insurance obligations for civil society organisations. Additionally, the draft envisions a centralized system for volunteer registration, which may introduce unnecessary bureaucracy. Finally, the administrative sanctions proposed in the draft risk establishing a restrictive and punitive environment, rather than one that fosters and encourages volunteerism. The organisations provided comments drafted by a legal expert, and key recommendations to improve the draft law, including redefining volunteering as a public service, simplifying registration procedures, ensuring proportional administrative measures, and aligning the law with Albania's social and economic context. These comments have been submitted to the ministry, along with a request for broader consultation with civil society.⁵⁰

According to the 2024 Capacity and Needs Assessment Report by NRC, 87 out of 110 surveyed NPOs (approx. 80%) declared that have engaged volunteers. The number of volunteers ranges from 1 to 533 per organisation, while 52% of the surveyed NPOs reported having up to 15 volunteers engaged.⁵¹ From the data collected, it results that the average time of a volunteer engagement with the participating organisation is around 9.8 hours per month. However, this average is influenced by the presence of NPOs with high number of volunteers engaged like the Food Bank organisation which as engaged more than 500 volunteers during 2024.

⁴⁸ The number of employees referrers as of January 2025.

⁴⁹ The information is retrieved from the electronic registry for notification and public consultation. Available at: https://www.konsultimipublik.gov.al/documents/RENJK_800_Projektligji-pe%CC%88r-vullnetarizmin.docx

⁵⁰ The information is retrieved from the official website of the National Resource Centre for Civil Society. Available at: <https://resourcecentre.al/sq/komente-p%d1%91r-projektligjin-per-vullnetarizmin/>

⁵¹ Partners Albania for Change and Development, 2025, "Capacity and Needs Assessment of Civil Society Organisation in Albania, 2024", page 10. Available at: <https://resourcecentre.al/publication/capacity-and-needs-assessment-of-civil-society-organisations-in-albania-2024/>

2.3.3. Civic Engagement

No legal changes on civic engagement have occurred during 2024. Civic engagement is taught in Albanian schools through the subject “Civic Education,” at the primary level of education, which equips pupils with the knowledge and skills to become informed, responsible, and active members of an increasingly interconnected society.

In practice, in the recent report published by The Konrad-Adenauer-Stiftung (KAS) the findings indicated low engagement in formal political processes of youth but higher participation in community initiatives and charitable activities, reflecting robust social cohesion.⁵²

⁵² Konrad Adenauer Stiftung, 2024, “Political and Civic Participation of Youth, Has Municipality”. Available at: <https://www.kas.de/documents/271859/0/Youth+participation+HAS.pdf/917ead2e-3b57-3afb-8d0e-65278e13b1f5?version=1.0&t=1723626275813>

Area 3: State-NPO Relationship

3.1. Framework and practices for cooperation

3.1.1. Strategies for Cooperation

As of 2024, Albania does not have a dedicated strategic document specifically governing cooperation between the government and civil society. The only official document that includes civil society as an area of focus is the Roadmap for the Functioning of Democratic Institutions.

The “Road Map for Government Policy towards a More Enabling Environment for Civil Society Development 2019–2023” has officially concluded its implementation period. In 2024, at the request of the Government of Albania and with the support of the EU Delegation to Albania and DG NEAR, an assessment was undertaken to evaluate the achievements and outcomes of this document. The purpose of the assessment was not only to serve as a guiding basis for the development of a new Road Map for the 2024–2027 period, but also to analyse the level of implementation of the measures set out in the 2019–2023 Road Map. Preliminary findings of the assessment were presented in June 2024 at a meeting organized by the Ministry of Health and Social Protection, attended by members of the National Council for Civil Society, representatives of the EU, national and international civil society experts, and representatives of the Technical Assistance to Civil Society Organisations (TACSO) programme in the Western Balkans and Türkiye. To date, this remains the only public update regarding the assessment process. The preliminary results showed that only 11% of the Road Map’s measures were fully implemented, reflecting a low level of government commitment to this agenda. This limited implementation is also attributed to the absence of a responsible institution for the coordination, monitoring, and evaluation of the Road Map. Meanwhile, the new 2024–2027 Road Map was expected to be finalized within the year, in line with the Road Map for the Functioning of Democratic Institutions. However, its development has been delayed, and no public information is currently available on its progress.

In practice, due to the lack of transparency in the evaluation of the Road Map 2019–2023 and the absence of public information on the development of the new Road Map, Partners Albania, together with a group of NPOs,⁵³ sent a formal letter to the Ministry of Health and Social Protection, as the lead institution of the National Council for Civil Society. The letter called on the Ministry to ensure a transparent, inclusive, and participatory process in drafting the 2024–2027 strategy, emphasizing the importance of involving NPOs and other stakeholders from the early stages.

3.1.2. Mechanisms for Cooperation

As part of broader reform efforts, the government has proposed the establishment of a single, better equipped, and more autonomous institutional structure to serve as the main platform for dialogue with civil society. This

⁵³ The information is retrieved from the webpage of the National Resource Center for Civil Society in Albania. Available at: <https://resourcecentre.al/2025/02/24/open-letter-on-the-assessment-of-the-roadmap-for-government-policy-towards-an-enabling-environment-for-civil-society-development-2019-2023-and-the-drafting-of-the-roadmap-for-the-period-2024/>

proposed structure would encompass economic, social, and environmental dimensions and would be supported by a dedicated headquarters and budget. According to the proposed model, civil society actors would be organized into three representative colleges. Although an initial assessment has been carried out with the support of the French government, there is still a lack of clarity regarding the implementation timeline, the involvement of relevant stakeholders, including civil society and the private sector, as well as the potential impact this new structure may have on existing mechanisms, such as the EU integration consultation platform.

Following a decision by the Council of Ministers in May 2025, SASPAC is officially designated as the National Coordinator for the implementation of the Reform and Growth Facility, a key EU initiative under the Growth Plan for the Western Balkans. In this role, SASPAC is responsible for the overall coordination, planning, and monitoring of reforms and investments supported by the Facility, working closely with the European Commission and relevant national institutions through a Joint Monitoring Committee, which will serve as the central governance body for tracking progress and ensuring the fulfilment of reform objectives.

The main mechanism for cooperation between the government and civil society is the National Council for Civil Society, a collegial advisory body, established in 2016 to promote cooperation between the state and civil society. Considering some problematic issues with the law for the establishment of the Council evidenced during its implementation, the government has included its revision in the Roadmap for the Functioning of Democratic Institutions. The new law on the National Council for Civil Society was planned to be approved by the Council of Ministers in 2024 and by the Parliament within the first six months of 2025⁵⁴. In the October 2024 meeting⁵⁵ of the NCCS, the amendments to the Law on the Establishment and Functioning of the NCCS were discussed. However, no legal changes occurred in 2024.

During 2024, the NCCS organized four meetings, one of which focused on the presentation of the preliminary findings of the assessment on the implementation of the Road Map 2019–2023 by the government. Other issues discussed in these meetings⁵⁶ include:

- The electronic register of NPOs and its connection to the new system being developed by the GDT.
- Implementation of the law exempting NPOs from VAT exemption for foreign grants.
- Proposals for the NCCS' calendar of activities for 2024.
- Update on the drafting process of new Roadmap for Civil Society, 2024-2027.
- Amendment of the NCCS Law.
- Notification on the approval of the new Roadmap on Functioning of Democratic Institutions.
- Albania's EU integration process, the role of civil society organisations in this process, and the involvement of the Joint Consultative Committee of civil society.
- Public co-financing and VAT exemption form for EU-funded projects.
- Proposals regarding the creation of the Order of the Public Health Profession.
- Presentation of the proposed changes to the Instruction "On Value Added Tax."

⁵⁴ Decision No. 311, dated 02.10.2024 "On the Approval of the Roadmap for the Functioning of Democratic Institutions" Available at: <https://amshc.gov.al/wp-content/uploads/2024/10/vendim-2024-10-02-611.pdf>

⁵⁵ National Council for Civil Society, 2024, "Minutes Meeting", pg. 6. Available at: <https://kkshc.gov.al/wp-content/uploads/2024/11/Procesverbal-Mbledhje-KKSHC-16.10.2024.pdf>

⁵⁶ The information is retrieved from the National Council for Civil Society official webpage. Available at: <https://kkshc.gov.al/385/>

In practice, the NCCS continues to not voice the concerns and priorities of NPOs, limiting its role to a formal structure with minimal impact on policymaking.

Another mechanism for cooperation is the National Council for European Integration (NCEI). According to its annual report, NCEI has organized 12 awareness-raising meetings. Among them, 3 meetings were held in cooperation with the academic community and 9 meetings were organised in collaboration with civil society⁵⁷.

Concerns about the lack of transparency surrounding the government's negotiating position and the absence of consultation with civil society representatives and interest groups, were raised by the head of NCEI and civil society organisations in one of the meetings. Participants expressed dissatisfaction with the limited access to the negotiating position document and the three roadmaps⁵⁸, as well as the insufficient inclusion of civil society in roundtables with the negotiating groups. Several proposals were put forward, including the establishment of a communication platform with the public for Cluster 1 “Fundamentals” and the chapters expected to open soon, increased involvement of civil society in monitoring the negotiation process, and the introduction of a mandatory transparency program by Albania’s Chief Negotiator with the EU.

The need for strengthening the role of civil society, including in the EU accession negotiation process, is also noted in the Albania Annual Report 2024⁵⁹ of the European Commission.

In practice, around 80% of the 110 surveyed CSOs for the 2024 Capacity and Needs Assessment Report⁶⁰, reported that they have been engaged in the country's EU integration process, but in a scale from “highly engaged” to “not engaged at all”, it is mostly “somehow engaged”, reinforcing the need for a strengthened role and a meaningful participation of the sector in the process.

3.2. Involvement in policy and decision-making process

3.2.1. Standards for NPO Involvement

In response to ongoing challenges, the government has included specific measures in the Roadmap for the Functioning of Democratic Institutions aimed at improving the quality of consultations, enhancing transparency, and increasing the participation of NPOs in decision-making processes.⁶¹

During 2024, the permanent parliamentary committees reviewed a total of 601 proposals for amendments by Members of Parliament (MPs), the Council of Ministers, civil society organisations, and interest groups. Of

⁵⁷ National Council for European Integration, 2025, “Annual Report 2024”. Available at:

<https://kuvendiwebfiles.blob.core.windows.net/webfiles/202503121052226078Raporti%20Vjetor%20i%20KKIE%202024.pdf>

⁵⁸ Roadmap for Public Administration Reform, Roadmap for the rule of law, Road map for the functioning of Democratic Institution.

⁵⁹ European Commission, 2024, “Albania Annual Report 2024”. Available at:

https://enlargement.ec.europa.eu/document/download/a8eec3f9-b2ec-4cb1-8748-9058854dbc68_en?filename=Albania%20Report%202024.pdf

⁶⁰ Partners Albania for Change and Development, 2025, “Capacity and Needs Assessment of Civil Society Organisation in Albania, 2024”, page 10. Available at: <https://resourcecentre.al/publication/capacity-and-needs-assessment-of-civil-society-organisations-in-albania-2024/>

⁶¹ Decision No. 311, dated 02.10.2024 “On the Approval of the Roadmap for the Functioning of Democratic Institutions” Available at: <https://amshc.gov.al/wp-content/uploads/2024/10/vendim-2024-10-02-611.pdf>

these, 511 were approved, respectively: 434 proposed by MPs, 5 proposed by the Council of Ministers, and 72 proposed by civil society organisations and interest groups.⁶²

On the government's side, efforts to improve transparency and public consultation showed mixed results. A total of 104 draft documents were published in the electronic register for public consultation by line ministries, nearly double the number reported in the MM Report 2023⁶³. However, when it comes to the consideration of NPO recommendations, responsiveness remains limited. Only the Ministry of Justice responded to the information request, reporting that 81% of the comments submitted by NPOs were incorporated into the improvements of the respective draft laws.

Table 3: Draft documents published at the electronic registry for public consultation

| Line Ministries | Published Consultations in 2024 |
|---|---------------------------------|
| Ministry of Education and Sport | 3 |
| Ministry of Finance | 6 |
| Ministry of Health and Social Protection | 3 |
| Ministry of Infrastructure and Energy | 14 |
| Ministry of Tourism and Environment | 24 |
| Ministry for Europe and Foreign Affairs | 3 |
| Ministry of Internal Affairs | 11 |
| Ministry of Defence | 9 |
| Ministry of Culture | 9 |
| Ministry of Agriculture and Rural Development | 7 |
| The Council of Ministers | 1 |
| Ministry of Justice | 5 |
| State Minister for the Protection of Entrepreneurship | 3 |
| State Minister for Youth and Children | 2 |
| State Minister and Chief Negotiator | 2 |
| State Minister for Public Administration and Anticorruption | 1 |

⁶² Albanian Parliament, 2025, "Raport për Pjesëmarrjen e Publikut dhe të Shoqërisë Civile në Procesin Vendimmarrës të Kuvendit për Vitin 2024" – draft raport". Available at:

<https://konsultimipublik.al/download/57d955ab651cf9a549bbf38b1d8de360aafeaf1e3bf03384a1ea572e08417f37>

⁶³ The information is retrieved from the consultation platform. Available at:

<https://konsultimipublik.gov.al/Konsultime/InstitucionReports/2>

| | |
|-------------------------------------|---|
| State Minister for Local Government | 1 |
|-------------------------------------|---|

Based on the responses to the request for information, the Ministry of Tourism and Environment, is the only line ministry which has a dedicated section for Public Consultation, where all interested parties can submit their suggestions, comments, recommendations.⁶⁴

In practice, there are several challenges for NPOs involvement in policy and decision-making. The involvement of NPOs in the early stages of law and policy drafting is uncommon. When it does occur, it often lacks meaningful engagement and transparency. Institutions usually report only aggregated participation data, without distinguishing between stakeholder types, leading to inaccurate representations of citizen involvement. Additionally, consultation reports rarely provide details on methods used or disaggregated feedback data.⁶⁵

According to the Capacity and Need Assessment 2024 Report by NRC, 57% of 110 surveyed NPOs responded that they have not participated in any consultative processes at the central level during 2024. The primary reasons cited for this lack of engagement include limited human and financial resources, which significantly hinder their ability to take part. Additional factors contributing to non-engagement include lack of information on consultation opportunities, newly established organisations, or being currently inactive. The report, also, highlight a significant disparity between NPOs based in the capital and those operating in other regions, with the latter facing greater barriers to participation.

Several key challenges in strengthening transparency, citizen engagement, and the overall effectiveness of its legislative role are highlighted in the report on public and civil society participation in the decision-making processes of the Albanian Parliament. A key priority for the parliament remains enhancing the connection between parliamentary activities and the public to support consolidation of democracy, good governance, and Albania’s EU integration. Despite ongoing efforts, the need for more structured and inclusive public consultations persists, along with the improvement of oversight mechanisms to ensure the effective implementation of laws. Strengthening cooperation with civil society, upgrading digital tools for transparency, and promoting new formats of citizen interaction are essential steps forward. Additionally, greater focus is needed on civic education, particularly for youth, to increase awareness of parliamentary processes and foster active participation. Enhancing data systems and methodologies for monitoring legislative impact, gender representation, and the outcomes of public consultations also remains vital for evidence-based policymaking and inclusive governance.⁶⁶

According to the Albania Report 2024 by the EU *“Parliament’s implementation of the legal framework for public consultation processes remains rather formal. Timely and transparent follow-up is not always ensured. Greater transparency and higher ethical standards in parliamentary proceedings are still necessary to enable citizens to*

⁶⁴ The information was obtained through responses to the information request submitted by Partners Albania to relevant public authorities. The link of the consultation page is: <https://turizmi.gov.al/konsultime/>

⁶⁵ Institute for Democracy and Mediation, 2025, “Public consultation in Albania: The illusion of inclusion”, Available at: <https://idmalbania.org/publication-cpt/monitoring-report-public-consultation-in-albania-the-illusion-of-inclusion/>

⁶⁶ Albanian Parliament, 2025, “Raport për Pjesëmarrjen e Publikut dhe të Shoqërisë Civile në Procesin Vendimmarrës të Kuvendit për Vitin 2024” – draft raport”. Pg. 53 – 54. Available at: <https://konsultimipublik.al/download/57d955ab651cf9a549bbf38b1d8de360aafef1e3bf03384a1ea572e08417f37>

easily access information about parliament's activities and to foster a more constructive political dialogue between the opposition and the majority".⁶⁷

A mechanism that ensures the participation of civil society in the European Union Accession Negotiation Process is the Partnership Platform for European Integration⁶⁸ (PPEI), where civil society representatives may participate in the steering board of the Platform and 33 discussion and consultation tables.⁶⁹

According to the Roadmap for the Functioning of Democratic Institutions, the 33 discussions and consultation tables would be established within 2024. According to the European Movement in Albania's information from March 2025, the discussion and consultation tables for Chapter 13 "Fisheries" and Chapter 33 "Financial and Budgetary Provisions" have not yet been established. Meanwhile, tables for Chapter 8 "Competition Policy" and Chapter 22 "Regional Policy and Structural Instruments" are in the process of formation.

The level of participation of 110 surveyed NPOs for the 2024 Capacity and Needs Assessment report by NRC, despite a slight increase from previous year (from 11% to 16%), remains critically low. CSOs outside the capital represent only 3% of the participating NPOs in these tables.

According to the Road Map for the Government Policy towards a More Enabling Environment for Civil Society Development 2019–2023, each public institutions must appoint a coordination for civil society. At the central level, the only institution to have a dedicated coordinator for civil society is the Albanian Parliament, while at the local level, Lezha municipality has it.

In May 2024, the Albanian Parliament established an ad hoc Anti-Corruption Committee as part of a broader reform initiative aimed at strengthening good governance, the rule of law, and anti-corruption under the Albania 2030 agenda. The committee, which formally began its work in July 2024, was created to review and update the national anti-corruption framework, harmonize legislation with EU standards, and provide strategic oversight of institutional reforms. While the committee has received technical support from the EU and the Council of Europe through the Action against Economic Crime, its composition has raised concerns, particularly due to the exclusion of opposition party members. Led by representatives of the ruling party, the committee has been criticized for lacking inclusivity and bipartisan legitimacy. Although civil society organizations have expressed interest in contributing to the process, their formal role remains limited, with few mechanisms for structured engagement or transparency. This has led to growing concerns about the politicization of the reform process, the weakening of institutional checks and balances, and the overall sustainability and credibility of anti-corruption efforts in the absence of broad-based participation and public accountability.

⁶⁷ European Commission, 2024, "Albania Annual Report 2024". Available at: https://enlargement.ec.europa.eu/document/download/a8eec3f9-b2ec-4cb1-8748-9058854dbc68_en?filename=Albania%20Report%202024.pdf

⁶⁸ The information is retrieved from the Partnership Platform for European Integration website. Available at: <https://integrimi-ne-be.punetegashtme.gov.al/en/strukturat/platforma-e-partneritetit-per-integrimin-evropian/>

⁶⁹ Decision of the Council of Ministers No. 749, date 19.12.2019 "On the Creation, Organisation, and Functioning of the State Structure Responsible for the Development of Negotiations and the Finalization of the Accession Treaty of the Republic of Albania to the European Union". Available at: <https://integrimi-ne-be.punetegashtme.gov.al/wp-content/uploads/2020/04/0-VKM-No.749-dt.19.12.2018-Krijimi-i-strukturave.pdf>

3.2.2. Access to Draft Regulations

In December 2024, the Office of the Commissioner for the Right to Information and Protection of Personal Data approved Order No. 209 "On the Approval of the Reporting Format of Public Authorities for the year 2024, "On the Implementation of the Requirements of the Law on the Right to Information". Based on this order, public authorities are required to report annually, no later than January 31 of the following year, regarding the implementation of the requirements of this law according to this format approved by the Commissioner⁷⁰.

In 2024, Commissioner's Office administrated 939 complaints and continued the administrative review of 86 cases carried over from 2023, amounting to a total of 1,025 complaints.⁷¹ These complaints were filed against public institutions for failure to respond to information requests within the legal timeframe. The report notes a slight decrease in the number of complaints over the past two years, which may indicate an improving trend in the proactive transparency of public authorities.

Of the total 1,025 complaints handled, in 623 cases the requested information or documentation was made available to the complainants during the administrative review process conducted by the Commissioner's Office. Formal decisions were issued for 23 complaints, including: 11 ordering decisions requiring the provision of information, 5 dismissal decisions, 2 inadmissibility decisions, and 4 decisions resulting in administrative fines. Following the entry into force of the amendments to the Law on the Right to Information, one decision was issued based on the new legal provisions. Although the majority of complaints are resolved administratively, the relatively limited number of ordering decisions and sanctions suggests the need to further strengthen the enforcement capacity of the institution and to promote the full implementation of the right to information.

In practice, public institutions in general fail to implement transparency and access to information standards and legal requirements. Many institutions neglect the regular publication and updating of data in the Transparency Program, reflecting both a lack of awareness and, in some cases, resistance within the administration. Frequent changes of the coordinators for the right to information within institutions, assigning of this duty to lower-level staff positions, and limited access to internal structures weaken the effectiveness of information handling.⁷²

Challenges in the implementation of the relevant legislation were also observed by Partners Albania during the preparation of this monitoring report. Official information requests were submitted to 17 ministries and 61 municipalities; however, only 5 ministries and 35 municipalities responded. In many instances, the responses were delayed beyond the legal deadlines or failed to fully address the specific requests submitted, highlighting persistent gaps in institutional transparency and accountability.

In a separate case, the National Business Center requested a fee to provide specific information, justifying the charge by claiming the data required statistical processing. It is worth noting that the same type of information

⁷⁰ Commissioner for the Right to Information and Protection of Personal Data, 2025, "Annual Report 2024". Available at: https://kuvendiwebfiles.blob.core.windows.net/webfiles/202504030920474698Draft%20_Raporti%20Final%2027%20Mars%202025.pdf

⁷¹ Ibid, pg. 67

⁷² The information is retrieved from the Balkanweb online news portal. Available at: <https://www.balkanweb.com/konferenca-kombetare-e-te-drejtes-per-informim-dervishi-ja-sfidat-me-te-cilat-perballet-e-drejta-per-informim-dhe-transparenca/#gsc.tab=0>

had been provided in previous years without a fee. This raises concerns about the practical impact of recent amendments to the Law on Access to Information, which grants public institutions significant discretion in deciding what information to disclose or withhold.

3.2.3. Cross Sector Bodies

The legislation requires public institutions to invite NPOs' representatives in decision-making bodies. Based on the responses received from public institutions, there are some cross-sector bodies identified, where NPOs are represented, as follows:

- The **Advisory Committee of the Private Tourism Sector (ACPTS)** serves as a consultative body for the tourism sector in Albania. Its organisation and functioning are defined by a regulation approved by the minister responsible for tourism, who also chairs the committee. ACPTS brings together representatives from various key stakeholders, including national business associations operating in or related to the tourism sector, higher education institutions, chambers of commerce, civil society organisations and NPOs active in tourism, as well as representatives from international institutions and donors. The participation of NPOs in this advisory structure ensures their voice is represented in shaping tourism policies and strategies, reinforcing the importance of inclusive governance in the development of the sector.

- The **Central Advisory Commission for Fisheries and Aquaculture**, provides opinions and recommendations on general issues and the analysis of the fisheries value chain, including access to resources, fishing activities, structural policies, market organisation, and aquaculture-related challenges. Representatives of NPOs are also included. Their involvement ensures that diverse perspectives are considered in decision-making processes.

- The **National Youth Council**, a consultative body within the National Youth Agency, is composed of members from youth organisations and young individuals.

- The **National Council of Gender Equality** is an interministerial advisory body that also comprises representatives of civil society. It is renewed once every four years and is headed by the Minister of MHSW and is composed of 9 representatives of line ministries at the rank of deputy ministers and senior managers, and three representatives of civil society.

The **National Economic Council**⁷³ aims to guarantee institutional cooperation and public-private partnership for the development of economic policies, dialogue and consultation between state administration bodies and the private sector, as well as increasing transparency in public decision-making and the representation of the private sector in this process, to improve the business climate.

- **At the local level**, NPOs are engaged in various structures, including Local Action Groups,⁷⁴ case management mechanisms for child protection and domestic violence, steering committees,⁷⁵ the Advisory Commission to

⁷³ The information is retrieved from the National Economic Council. Available at: <https://kek.gov.al/>

⁷⁴ Kolonja municipality,

⁷⁵ Durres municipality

the Mayor⁷⁶, the Project Evaluation Commission for the ReLOaD Call for Proposals,⁷⁷ technical multidisciplinary groups⁷⁸, and other participatory bodies.

3.3. Collaboration in service provision

3.3.1. NPO Engagement in Service Provision and Contracting Procedures

Public Procurement is an important area within Cluster 1 “Fundamentals”. Concerning service provision and competition for state contracts, Law No. 162/2020 “For Public Procurement”, was amended in 2024 by further aligning the legal framework with the EU *acquis* and including provisions for future technological developments.⁷⁹ In addition Albania undertook significant reforms in its social services sector, guided by the adoption of the National Social Protection Strategy 2024–2030, and its Action Plan⁸⁰ and the Social Inclusion Policy 2024–2028, both of which aim to enhance accessibility, inclusion, and decentralization in service delivery.⁸¹ A central element of these reforms is the expansion of the Social Fund, projected to increase by 7% annually between 2024 and 2026, enabling the financing of at least 12 new types of social services each year.⁸² Progress in deinstitutionalization continued, marked by a transition from institutional care to community- and home-based service models, alongside the initial rollout of the National Electronic Register of Social Care Services (NERCS), which is still in the process of full implementation.⁸³

In response to PA’ request for information, the Agency of the Public Procurement clarified that the procurement of social services is regulated by the Decision of the Council of Ministers No. 768, dated 15.12.2021, which defines the types of social and specific services eligible for reserved public procurement procedures and outlines the detailed rules for their implementation. According to Article 5 of this decision, if the estimated annual value of such services does not exceed 20 million ALL, contracting authorities are not required to apply public procurement procedures. Nevertheless, the planning and corresponding values of these services must still be recorded in the procurement planning and implementation registers.

In 2024, no procurement procedures for social services exceeding the monetary threshold set by the DCM were conducted through the Electronic Procurement System. However, 2 entries related to the procurement of social services were included in the 2024 Procurement Planning Register in Korce and Mat Municipality.⁸⁴

⁷⁶ Belsh municipality

⁷⁷ Shkodra and Lezha municipality

⁷⁸ Lezha municipality

⁷⁹ Official Gazette <https://qbz.gov.al/preview/aef29e14-849b-4f8c-9915-888c861bcb4f/cons/20240308>

⁸⁰ Official Gazette 51/2024, Decision No. 152, dated 13.3.2024 “On the Approval of the National Social Protection Strategy 2024 – 2030, and the Action Plan for its Implementation”. Available at: <https://qbz.gov.al/eli/vendim/2024/03/13/152>

⁸¹ UN Albania, Progress Report on the Implementation of the UNSDCF in Albania – 2024.

⁸² European Commission, 2024 Albania Report.

⁸³ Ibid

⁸⁴ Based on the response that the PA provided on the request for information submitted by Partners Albania

3.3.2. Funding and M&E for CSO-Provides Services

In 2024, the following public authorities, which responded to Partners Albania` request for information, contracted services to NPOs:

Table 4: Contracting services to NPOs.

| Institutions | Awarded NPOs | Minimum and maximum amount of funding | Total Amount distributed in FY 2024 |
|------------------------------------|--------------|--|---|
| Kolonjë Municipality ⁸⁵ | 1 | Min.: 826,223 ALL (approx.8,260 EUR) Max. 1,327,030 ALL (approx.13,000 EUR) | 3,139,893 ALL (approx. 31,300 EUR) |
| Shkodër Municipality | 4 | Min.: 50,000 ALL (approx. 500 EUR) Max.: 2,021,000 ALL (approx. 20,000 EUR) | 4,128,000 ALL (approx. 41,300 EUR) |
| Durrës Municipality | 1 | 642,000 ALL (approx. 6,400 EUR) | 642,000 ALL (approx. 6,400 EUR) |
| Dibër Municipality | 1 | 960,000 ALL (approx.9,600 EUR) | 960,000 ALL (approx. 9,600 EUR) |

Public authorities can exercise monitoring and assessment of service provision both in terms of the quality of the services and the expenditure of funding. They have the right to inspect the premises in which services are provided. After the inspection, a report is prepared by the inspecting authority and shared with the service provider, including recommendations for improvements. Nevertheless, there are no publicly available reports on the impact of the results achieved or the services provided.

⁸⁵ The support is being provided through the mutual agreement, not through a service contract.

Bibliography

Agency for the Support of Civil Society, 2024, Decision No. 02, dated 23.04.2024 "For the approval of project proposal, call for proposals 17 and the funding amounts <https://amshc.gov.al/wp-content/uploads/2024/11/Vendimi-Nr-2-I-Bordit-Mbikqyres-2024.pdf>

Albanian Parliament, 2025, "Raport për Pjesëmarrjen e Publikut dhe të Shoqërisë Civile në Procesin Vendimmarrës të Kuvendit për Vitin 2024" – draft raport". Available at: <https://konsultimipublik.al/download/57d955ab651cf9a549bbf38b1d8de360aafef1e3bf03384a1ea572e08417f37>

Article 19 organisation, 2024, "The state of the state of freedom of expression around the world". Available at: <https://www.globalexpressionreport.org/>

Bytyci, F., Goga, F., "Albania TikTok ban sparks debate over freedom of speech". Available at: https://www.reuters.com/world/europe/albania-tiktok-ban-sparks-debate-over-freedom-speech-2025-01-02/?utm_source=chatgpt.com

Commissioner for the Right to Information and Protection of Personal Data, 2025, "Annual Report 2024". Available at: <https://kuvendiwebfiles.blob.core.windows.net/webfiles/202504030920474698Draft%20Raporti%20Final%2027%20Mars%202025.pdf>

Decision of the Council of Ministers No. 749, date 19.12.2019 "On the Creation, Organisation, and Functioning of the State Structure Responsible for the Development of Negotiations and the Finalization of the Accession Treaty of the Republic of Albania to the European Union". Available at: <https://integrimi-ne-be.punetejashtme.gov.al/wp-content/uploads/2020/04/0-VKM-No.749-dt.19.12.2018-Krijimi-i-strukturave.pdf>

Decision No. 311, dated 02.10.2024 "On the Approval of the Roadmap for the Functioning of Democratic Institutions" Available at: <https://amshc.gov.al/wp-content/uploads/2024/10/vendim-2024-10-02-611.pdf>

Decision of the Council of Ministers No. 621 dated 10.10.2024 "On the approval of the policy document "National Reform Agenda 2024–2027", within the framework of the European Union instrument "Facility for Reforms and Growth for the Western Balkans". Available at: <https://www.drejtesia.gov.al/wp-content/uploads/2024/11/Dokument-Politik-Agienda-Kombetare-e-Reformave-2024-2027.pdf>

European Commission, 2024, "Albania Annual Report 2024". Available at: https://enlargement.ec.europa.eu/document/download/a8eec3f9-b2ec-4cb1-8748-9058854dbc68_en?filename=Albania%20Report%202024.pdf

Institute for Democracy and Mediation, 2025, "Public consultation in Albania: The illusion of inclusion", Available at: <https://idmalbania.org/publication-cpt/monitoring-report-public-consultation-in-albania-the-illusion-of-inclusion/>

Konrad Adenauer Stiftung, 2024, “Politik and Civic Participation of Youth, Has Municipality”. Available at: <https://www.kas.de/documents/271859/0/Youth+participation+HAS.pdf/917ead2e-3b57-3afb-8d0e-65278e13b1f5?version=1.0&t=1723626275813>

National Cyber Security Authority of Albania (NCSA), 2024” *Global Cyber Policies Dialogues: Western Balkans – Meeting Summary*”. Available at: https://static1.squarespace.com/static/5ca0ec9b809d8e4c67c27b3a/t/67bcb7dac417180ef4682dbf/1740421083936/Meeting+Summary+Western+Balkans+Cyber+Policy+Dialogue+Nov+2024+Final_web.pdf

National Council for Civil Society, 2024, “Minutes Meeting”. Available at: <https://kkshc.gov.al/wp-content/uploads/2024/11/Procesverbal-Mbledhje-KKSHC-16.10.2024.pdf>

National Accountability Council, (2018), “*National Standards for NPOs Accountability*”. Available at: <https://kkk.gov.al/udhezuesi-per-hartimin-e-raportit-jofinanciar/>

Law No. 7961 date 12.07.1995 “Labor Code of the Republic of Albania”, amended, Available at: <https://www.qbz.gov.al/preview/c1c18a6c-5f3e-457d-b931-de505b3c7ed0>

Law No. 14/2024 “On the approval of the National Security Strategy of the Republic of Albania”. Available at: <https://www.mod.gov.al/images/PDF/2024/SSK-NSS-english.pdf>

Law No. 10093, “On the Establishment and Functioning of the Agency for the Support of Civil Society”. Available at: <https://amshc.gov.al/wp-content/uploads/2024/08/ligj-2009-03-09-10093-1.pdf>

Official Gazette 30/2001, Law no. 162/2020 “On Public Procurement, updated. Available at: <https://qbz.gov.al/preview/aef29e14-849b-4f8c-9915-888c861bcb4f/cons/20240308>

Official Gazette 198/ 2024 DECISION No. 621, dated 10.10.2024 “on the approval of the policy document “National Reform Agenda 2024–2027”, within the framework of the European Union instrument “Reform and Growth Facility for the Western Balkans”. Available at: <https://qbz.gov.al/share/2JGelQYcTH-1hZl34UeMdw>

Official Gazette 70/2023, Law no, 93/2023 “On Income Tax”. Available at: <https://qbz.gov.al/eli/ligj/2023/03/30/29/e0b4e6c5-bf37-4102-a57c-fd51244a2d5f>

Official Gazette 249/2015, Law No. 139/2015 “On local self-government”, article 54, letter e/1. Available at: <https://qbz.gov.al/eli/ligj/2015/12/17/139>

Official Gazette 28/2001, Law No. 8788, dated 07.05.2001 “For the Nonprofit Organisations”, updated. Available at: <https://qbz.gov.al/eli/ligj/2001/05/07/8788>

Official Gazette 121/2021, Law No. 80/2021 “For the Registration of Non-profit Organisations”, updated. Available at <https://qbz.gov.al/eli/ligj/2021/06/24/80/852c9af6-f25b-492e-aa48-577ff8077583>

Partners Albania for Change and Development, 2025, “Philanthropy magazine”. Available at: <https://bit.ly/43oju8l>

Partners Albania for Change and Development, (2024), “*Dua Partner Albania Newsletter*”, Available at: https://us5.campaign-archive.com/?e=test_email&u=a1424fae50005c4af8fca014f&id=ce110b6eed

Partners Albania for Change and Development, 2025, "*Capacity and Needs Assessment of Civil Society Organisation in Albania, 2024*". Available at: <https://resourcecentre.al/publication/capacity-and-needs-assessment-of-civil-society-organisations-in-albania-2024/>

Semini, LL., 2024, "*Albanian prime minister says TikTok ban was not a 'rushed reaction to a single incident'*". Available at: <https://apnews.com/article/albania-tiktok-ban-children-violence-bullying-c6dd46c1de5cc2996b4004bcb2a76a66>

