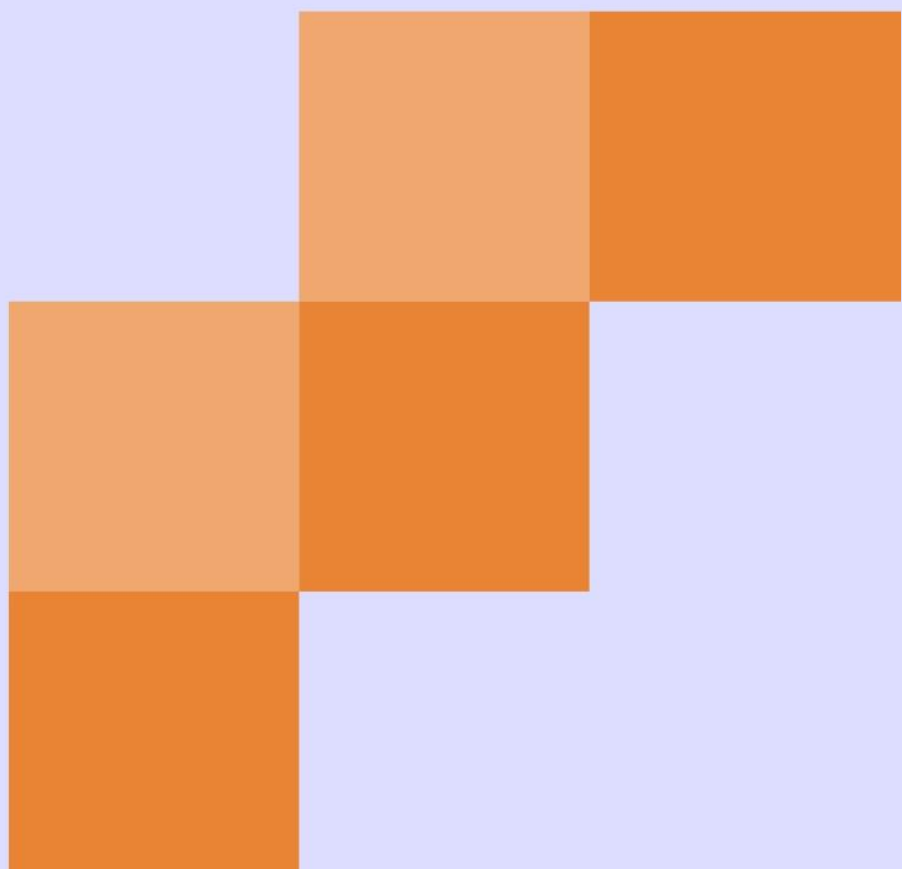


Monitoring Matrix on Enabling Environment for Civil Society Development

PARTNERSALBANIA
FOR CHANGE AND DEVELOPMENT

Country Report:
Albania 2025



Monitoring Matrix on Enabling Environment for Civil Society Development

Country Report for Albania 2025

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
EU	European Union
FIA	Financial Intelligence Agency
FY	Fiscal Year
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
VAT	Value Added Tax

Acknowledgments

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Partners Albania also extends its appreciation to the representatives of public institutions who responded to requests for information, participated in interviews, and provided data that significantly enriched and supported the analysis presented in the report.

Finally, we would like to thank our colleagues at the Balkan Civil Society Development Network for their guidance and support.

Executive Summary

During 2025–2026, Albania adopted a large number of legislative acts driven by its EU accession process. However, public consultation, follow-up on the comments and recommendations received, and institutional action to implement the legislation have not kept pace with its adoption. This was reflected across all three areas of the monitoring matrix.

The legal environment for freedom of association was characterised by delays in adopting the necessary legislative amendments. Amendments to Law No. 80/2021 “On the Registration of Non-Profit Organisations”, to give effect to the Constitutional Court’s decision, were adopted in December 2025, two years behind schedule, while concerns about disproportionate fines remained unresolved. As of 26 February 2026, the Tirana Judicial District Court published a list of nonprofit organisations on its website.¹ However, in the form reviewed, the listing fell short of a fully functional electronic registry. First, it appeared incomplete, and the extent to which it covered registered organisations, as well as its practical usability, remained unclear. Second, the information available was minimal and provided few details about registered organisations. In addition, the interface did not allow users to filter, sort or search the data to facilitate access to information.

With regard to the prevention of money laundering and terrorist financing, the legislative amendments adopted in April 2026 introduced the category of “non-profit organisations considered to be high-risk”, without specifying which authority determines this classification or on what basis. This wording is inconsistent with FATF Recommendation 8’s risk-based and proportionate approach and risks subjective interpretation and reputational harm to NPOs.

On freedom of expression, a January 2026 parliamentary package was adopted but fell short of full defamation decriminalisation, extending protection only to “registered” or “recognised” journalists while excluding activists, NPOs, and the general public. This is a specific gap against Albania’s EU-aligned commitments. Concerning the narrative towards NPOs, the Stop Order issued on 20 January 2025 by the U.S. Administration was accompanied by an amplification of scepticism toward civil society and efforts to undermine the legitimacy of critical organisations, further narrowing civic space. Smear campaigns against NPOs in Albania intensified, particularly targeting those working on human rights, gender equality, and LGBTI rights. The suspension of foreign assistance was used by certain political and media actors to question the legitimacy, independence, and transparency of NPOs receiving international funding, portraying them as externally driven or politically motivated. These narratives were amplified through online platforms and segments of the media, contributing to disinformation, reputational harm, and increased hostility toward organisations engaged in public interest advocacy.

State financial support to the sector has historically been insufficient to meet their needs. With the withdrawal of bilateral donors and the decline in foreign aid, financial sustainability challenges have intensified, putting at

¹ The information is available on the Tirana Judicial District Court website. Available at: <https://gjykata.gov.al/rrethi-tiran%C3%AB/gjykata-e-shkall%C3%ABs-s%C3%AB-par%C3%AB-e-juridiksionit-t%C3%AB-pergjithsh%C3%ABm-tiran%C3%AB/regjistri-elektronik-ojf/>

risk the continuity of many non-profit services and the sector's contribution to the country's social, economic, and democratic development. State financial support to the sector Only 75 of roughly 2,412 active NPOs,² about 3.1 %, received Agency for the Support of Civil Society funding in 2025, and ministry financing typically caps at 50% of eligible costs.

Concerning taxation, a positive development in 2025 was the adoption of Instruction No. 6, dated 24 February 2025, amending Instruction No. 6 of 30 January 2015 “On Value Added Tax in the Republic of Albania.” The revised provisions clarify the procedures for applying VAT exemptions to grant agreements financed under bilateral arrangements between the Albanian Government and foreign governments and ratified by Parliament. In addition, according to publicly available information from SASPAC, work is underway to enable the application process for VAT exemption related to foreign-funded projects to be carried out through the e-Albania portal, which would further streamline and digitalise the procedure. The exemption is now operational and responds to a long-standing concern raised by NPOs regarding administrative uncertainty in VAT treatment. While this represents an important step toward greater legal clarity and procedural efficiency, effective implementation will depend on consistent application by all relevant institutions and improved awareness among stakeholders involved in grant management and taxation procedures.

Strategic cooperation frameworks between government and the NPO sector are largely absent or stalled, reflecting a broader pattern of formal commitments that have not translated into functioning structures. No current government strategy for NPO development exists. The Road Map for the Government Policy towards a More Enabling Environment for Civil Society Development, 2019–2023, expired with low achievement, and although a successor strategy was expected, none has appeared more than two years later, leaving the sector without a governing framework to guide state engagement or measure progress against.

A key challenge in Albania is the engagement of NPOs in policy making and consultation processes. The consultation process frequently begins only after draft legislation has already been prepared, rather than during the earliest stages of policy development. Instead of being involved in identifying policy problems, assessing regulatory options, and shaping legislative priorities, NPOs are typically invited to comment on texts that have already been substantially drafted. This significantly limits the ability of consultations to influence the substance of legislation, reducing them to a procedural step focused on reviewing completed proposals rather than a participatory process that informs policymaking from the outset.

This challenge is further compound by the frequent use of accelerated legislative procedures and expedited adoption processes, which substantially shorten consultation timeframes or, in some cases, bypass consultation altogether. While urgent procedures may be justified in exceptional circumstances, their repeated use weakens transparency and limits opportunities for evidence-based contributions from civil society. In addition, although the Partnership Platform for European Integration was established to facilitate structured dialogue between public institutions and civil society, there is limited publicly available information regarding its activities, membership, consultation schedules, outputs, or the extent to which civil society recommendations influence negotiating positions and accession-related reforms. This lack of transparency makes it difficult to assess whether participation is regular, representative, and meaningful, and weakens public accountability for one of the country's most important policy processes.

² Institute of Statistics “Business Registry”. Available online: <https://www.instat.gov.al/media/2hololz3/tab-1-nj%C3%ABsi-ligjore-aktive-sipas-form%C3%ABs-ligjore.xlsx>

Civil Society Overview

	2024	2025
Number of registered organisations	13,053 NPOs 284 NPO registered in 2024	13,300 NPOs 246 organisation registered in 2025
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	Draft Law on Volunteering DCM No. 611, date 2.10.2024, “For the Approval of the Roadmap for Functioning of the Democratic Institutions”	Law no. 82/2021 “For the registration of nonprofit organisations” amended Instruction No. 6, dated 24.02.2025. “On some changes and amendments of Instruction No. 6 of 30 January 2015 “On Value Added Tax in the Republic of Albania.”
State funding	Agency for the Support of Civil Society: 96.5 million ALL (approx.968,150 EUR)	Agency for the Support of Civil Society:107 million ALL (approx. 1.12 million EUR)
Human resources (employees and volunteers)	9,875 employees of which 8,916 employed full-time and 959 part-time employees. No available data on volunteers	No figures is available for employees for full-time, part-time employees working in the sector. 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	Challenges in obtaining accurate and timely data on NPO sector Lack of functioning of the electronic registry for NPOS Ineffective VAT exemption procedures for foreign grants	Lack of meaningful consultation processes with NPOs Lack of functioning of the electronic registry for NPOs Lack of reliable data for NPOs

Key findings

1	The electronic NPO registry, mandated to become operational by 30 December 2023 under Law No. 80/2021, remains nonfunctional. As of February 2026, the Tirana Judicial District Court has published only a partial web-based listing that does not allow users to search, filter, or sort entries. Average registration time at the Court in 2025 was 90 days against a 15 day legal limit.
2	Public funding to the sector remains fragmented and largely project based. There is no single consolidated figure for total public funding to NPOs, as it is distributed across the Agency for the Support of Civil Society and multiple line ministries with no unified reporting. Institutional or core funding does not exist as a dedicated funding scheme, and state funding for NPO delivered social services is described as almost absent, leaving organisations highly dependent on foreign donors whose support is itself contracting.
3	No current government strategy for NPO development exists. The Road Map for the Government Policy towards a More Enabling Environment for Civil Society Development 2019 - 2023 expired with low achievement, and no successor has been adopted more than two years later. Separately, under the related Roadmap for the Functioning of Democratic Institutions include measures for civil society but no public evaluation report exists and data provided through the FOI are not supported with evidence.
4	Public consultation faces significant practical challenges despite a clear legal basis. The electronic consultation platform had faced technical challenges to accessed for stakeholders trying to submit comments, Cluster One “Fundamentals” draft laws have advanced with consultation occurring too late to shape outcomes, and consultation summary reports are inconsistently published, often without explaining whether input was accepted or rejected.

Key recommendations

1	Prioritise making the electronic NPO registry fully functional, with a published timeline and interim reporting on progress, given how far its implementation already lags the 2023 legal deadline.
2	Consolidate public funding reporting for NPOs into a single, regularly published source across all disbursing institutions, and introduce a dedicated core or institutional funding mechanism to reduce dependence on project based and foreign funding.
3	Adopt a successor strategy to the Road Map for the Government Policy towards a More Enabling Environment for Civil Society Development, 2019 -2023, and require that achievement claims under the Roadmap for the Functioning of Democratic Institutions be accompanied by published, methodologically transparent evidence.
4	Ensure meaningful participation by involving stakeholders from the beginning of the consultation process and requiring institutions to publish a substantive response to every consultation, so that input can genuinely shape outcomes.

Introduction

Partners Albania for Change and Development is pleased to present the 13th edition of the “*Monitoring Matrix on Enabling Environment for Civil Society Development – Country Report for Albania 2025*”. The report reflects developments during 2025 but also includes some key development from early 2026 to provide a more comprehensive and up-to-date overview.

This report is part of a series of country reports covering seven Western Balkan countries (Albania, Bosnia and Herzegovina, Kosovo, North Macedonia, Montenegro, Serbia) and Türkiye. 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.

Background | Country Overview

Developments affecting civil society in Albania during 2025 took place in a dynamic political and institutional environment, shaped primarily by the parliamentary elections and the accelerated European Union accession process.

The parliamentary elections of 11 May resulted in a fourth consecutive mandate for the Socialist Party and marked the first time that Albanian citizens residing abroad were able to vote. According to the OSCE/ODIHR, the elections were competitive and professionally conducted but took place in a highly polarised environment in which contestants operated within an uneven electoral environment. The ruling party benefited from the use of administrative resources and institutional leverage, while allegations of pressure on voters, particularly public sector employees, were reported. Media ownership concentration, interference in editorial autonomy, political influence and self-censorship among journalists further limited the diversity of information available to voters.³ Independent monitoring by domestic civil society organisations became particularly important. However, insufficient funding, especially from international donors, limited their capacity to conduct comprehensive election observation, and reduced the overall scrutiny of the electoral process.⁴

At the same time, Albania made further progress in its EU accession negotiations. During 2025, negotiations were opened on four additional clusters⁵ by November, although no chapter had yet been closed.⁶ The accelerated accession process increased the volume and pace of legislative, policy and institutional reforms required to align the national framework with the EU acquis. However, it did not translate into more meaningful civil society participation. The volume of accession-related legislation and the compressed timetable for its preparation and adoption limited the ability of NPOs to review proposals and develop evidence-based recommendations. The European Commission emphasised that the EU integration process needed to become more inclusive and be supported by effective consultation mechanisms. It also emphasised that public consultation processes remained limited, parliamentary consultations did not consistently receive timely and transparent follow-up, and that civil society participation in government consultations needed to be further encouraged.⁷

Economic growth, expanding tourism and the continued digitalisation of public services created development opportunities during the year. Nevertheless, emigration, demographic decline, regional disparities, social

³ OSCE Office for Democratic Institutions and Human Rights. (2025). Republic of Albania: Parliamentary Elections, 11 May 2025—ODIHR Election Observation Mission Final Report, pp. 2–4 and 22–25. Available online: https://odihr.osce.org/sites/default/files/documents/official_documents/2026/05/ALB%20Parliamentary%202025%20Final%20Report_23.10.2025.pdf

⁴ Ibid. pg. 27

⁵ The Internal Market in April, Competitiveness and Inclusive Growth in May, the Green Agenda and Sustainable Connectivity in September, and Resources, Agriculture and Cohesion cluster in November

⁶ Council of the European Union. (2025). Seventh meeting of the Accession Conference with Albania at ministerial level, 17 November 2025. See also European Commission. (2025). Albania Report 2025, pp. 3–4 and 93–95. Available at:

https://enlargement.ec.europa.eu/document/download/fe9138b7-90fe-4277-a12c-3a03f6d1957f_en?filename=albania-report-2025.pdf

⁷ European Commission. (2025). Albania 2025 Report, Commission Staff Working Document SWD (2025) 750 final. Available at:

https://enlargement.ec.europa.eu/document/download/fe9138b7-90fe-4277-a12c-3a03f6d1957f_en?filename=albania-report-2025.pdf&utm_source

vulnerability and unequal access to services remained significant concerns.⁸ Improvements in economic indicators did not necessarily benefit all groups or regions equally, while gaps in social, educational and other public services continued to affect vulnerable groups and communities outside the main urban centres. The European Commission also noted persistent structural labour-market problems, skills gaps and the need to ensure equal access to increasingly digitalised public services, particularly for vulnerable groups.⁹

Within this broader context, NPOs continued to provide services, represent communities, contribute expertise to reforms and independently monitor public institutions. However, limited project-based funding, uneven institutional cooperation, administrative burdens and broader civic space concerns constrained their sustainability and capacity to engage consistently in policymaking, conduct long-term monitoring and maintain essential services.

⁸ Ibid, pg. 14, 40–42 and 54–57

⁹ Ibid, pg. 8–9, 24, 26 and 56–57.

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 is general in line with international standards. The Constitution of the Republic of Albania,¹⁰ Law No. 8788/2001 “On nonprofit organisations”, amended,¹¹ and Law No. 80/2021 “On the registration of nonprofit organisations” as amended,¹² regulate the full lifecycle of nonprofit organisations (NPOs), including their establishment, registration, operation, governance, and dissolution. Natural and legal persons may establish associations, foundations, and centres for any lawful purpose without discrimination. The same guarantees also apply to foreigners, as the Constitution provides that the fundamental rights and freedoms, as well as the obligations foreseen for Albanian citizens, apply equally to them, except in cases where the Constitution specifically links the exercise of certain rights and freedoms to Albanian citizenship. In addition, the registration of NPOs is not compulsory. Where organisations choose to register, the legal framework provides clear procedures that enables a registration process.

In December 2025, the law on the registration of NPOs was amended, reflecting the decision of the Constitutional Court issued in November 2023,¹³ which stipulated invalidation related to initial registration at the Tirana Judicial District Court within 30 days, specific attributes of the chancellor and element imposing administrative sanctions. The amendment came roughly two years late.¹⁴ However, administrative sanctions remain a concern in the approved law. The draft law introduced administrative sanctions that overlapped with those already provided under existing legislation, creating legal uncertainty and exposing NPOs to the risk of being sanctioned twice for the same violation. It stipulated administrative sanctions of up to ALL 60,000 (approximately EUR 625) for submitting inaccurate information or failing to report changes within the prescribed deadlines. During the consultation process on the legislative amendments arising from the Constitutional Court decision, NPOs raised concerns regarding the proportionality of the proposed administrative sanctions. Nevertheless, these concerns were not taken into account in the final amendments.

¹⁰ Constitution of the Republic of Albania. Available at: <https://qbz.gov.al/preview/635d44bd-96ee-4bc5-8d93-d928cf6f2abd>

¹¹ Official Gazette 28/2001, Law No. 8788, dated 7.05.2001 “For nonprofit organisations”, amended. Available at:

<https://qbz.gov.al/share/6H8dDcYBQXuuzSkfqPE1Hg>

¹² Official Gazette 121/2021, Law No. 80/2021 “For registration of nonprofit organisations” amended. Available at:

https://qbz.gov.al/share/w3e6ZV2nR76t_BQFht-CXw

¹³ Official Gazette <https://qbz.gov.al/eli/vendim/2023/11/20/62/54732040-bf13-412e-8d47-09b1736264d6>

¹⁴ The Constitutional Court Decision was published at the Official Gazette 5/2024. Available at:

<https://qbz.gov.al/eli/vendim/2023/11/20/62/54732040-bf13-412e-8d47-09b1736264d6>

The legal framework allows organisations to network within the country and abroad without prior notification. If registered, networks must take any legal forms stipulated by law: centre, association, or foundation. There are no legal provisions related to blocking social media networks.

During 2025, several legislative initiatives were launched in connection with Cluster One “Fundamentals” and efforts to strengthen transparency, integrity, and the fight against corruption. Three are particularly relevant to NPO operations: the draft Law on Whistleblowing and Whistleblower Protection, the draft Law on Lobbying, and the draft Law on Donations and Sponsorships. Although these initiatives aimed to strengthen transparency, integrity, and accountability, NPOs raised concerns during the consultation processes about specific provisions and their potential impact on the enabling environment for their operations.

The draft Law on Whistleblowing and Whistleblower Protection aimed to strengthen the legal framework for reporting misconduct and protecting whistleblowers. During the consultation process, Partners Albania raised several concerns regarding the clarity and effective implementation of the proposed framework. These included the absence of an explicit repeal of Law No. 60/2016, which could create legal uncertainty and overlapping provisions; the lack of transitional arrangements for existing whistleblowing structures; insufficient guarantees for the functional and budgetary independence of HIDAACI; and the need for clearer coordination with other law-enforcement institutions.¹⁵ The recommendations focused on strengthening legal clarity, institutional independence, and coordination to support consistent and effective implementation of the framework.

The draft Law on Lobbying aimed to increase transparency and accountability regarding efforts to influence public decision-making. While supporting the objective of greater transparency, Partners Albania raised concerns regarding the broad definition and scope of lobbying activities, particularly the risk that public-interest advocacy undertaken by NPOs could be treated in the same manner as professional or commercial lobbying undertaken in pursuit of private interests.¹⁶ Concerns were also raised regarding the proportionality of registration and reporting requirements for NPOs, particularly smaller organisations with limited administrative capacity. The recommendations stressed the need to clearly distinguish civil society advocacy from professional lobbying and to ensure that transparency requirements do not create disproportionate barriers to NPO participation in public policy processes. The draft Law on Donations and Sponsorships, which forms part of these broader reforms and has particular implications for NPOs’ access to resources, is analysed in detail in Area 2.1.

Practice was consistent with the legal framework regarding the ability of individuals and legal entities to establish nonprofit organisations. However, timely and low-cost registration was only partially ensured. According to the response received by the Judicial District Court of Tirana (herewith after: The Court), the total number of registered NPOs in 2025 was 13,300, an increase approximately of 2% compared to the previous year. A total of 246 new NPOs were registered in 2025, comprising 140 associations, 65 centres, and 41 foundations. Regarding registration applications, the Court issued 65 decisions rejecting applications at the outset due to non-compliance with legal requirements or incomplete documentation. It also issued 40 decisions discontinuing the proceedings and returning case files, where the same deficiencies were identified after the proceedings had begun. The Court did not provide data on cases in which individuals were denied the right to

¹⁵ Partners Albania for Change and Development. (2025). Comments on the Draft Law on Whistleblowing and Whistleblower Protection. Available at: <https://www.partnersalbania.org/News/comments-on-the-draft-law-on-whistleblowing-and-whistleblower-protection/>

¹⁶ Partners Albania for Change and Development. (2025). Comments and recommendations on the Draft Law “On Lobbying”. Available at: <https://www.partnersalbania.org/News/comments-and-recommendations-on-the-draft-law-on-lobbying/>

serve as founding members, explaining that this would require reviewing each decision individually, which was not feasible given its limited human resources. The electronic NPO registry, which was scheduled to become operational by 30 December 2023, remains nonfunctional. As of 26 February 2026, the Court had published a web-based listing of NPOs on its website.¹⁷ However, in the form available at that time, the listing fell short of a fully functional electronic registry. It appeared incomplete, and its overall coverage and reliability remained unclear. Moreover, the information provided was minimal, and the interface did not allow users to effectively search, filter, or sort entries to facilitate meaningful access to information.

According to INSTAT, there were 2,412 active NPOs and international organisations at the end of 2025, compared with 2,494 in 2024, representing a decrease of approximately 3.3%. Of these, 178 were registered during 2025.¹⁸

In May 2025, Partners Albania conducted a survey of 76 NPOs focusing exclusively on registration and re-registration procedures. The survey was complemented by interviews with NPO representatives to explore their experiences in greater depth. The findings revealed significant and persistent challenges, with 80% of surveyed NPOs reporting difficulties with these procedures. Organisations commonly described court procedures for registering changes as lengthy, unclear and administratively burdensome.

The most frequently reported concern related to excessive delays in the review of applications, which in many cases ranged from several months to one or even two years, and in some instances longer. These delays affected amendments to statutes, changes of address, renewal of board mandates, and changes of legal representatives. A major concern that emerged from both the survey responses and interviews was the lack of predictability and consistency in the handling of cases. Organisations reported that similar cases had been treated differently by different judges, including repeated refusals and requests for additional documentation that were not always perceived as clearly grounded in law.

The findings also pointed to insufficient institutional guidance and weak communication with the Court. Many organisations highlighted difficulties in obtaining information about the status of their applications, contacting Court staff, or clearly understanding procedural requirements. In some cases, even obtaining basic confirmation that an application had been submitted required several visits to the Court.

These procedural shortcomings led to blocked bank accounts, difficulties updating information with public institutions, and delays in signing grant agreements and implementing projects. Centralised procedures in Tirana created additional burdens for NPOs outside the capital. In 2025, registration with the Court took an average of 90 days.¹⁹

“We are a newly established organisation operating in the Dibra region. After changing our office premises, we submitted the relevant updates to the Court for registration. However, it took four months for these changes to be approved. In addition, the process required us to travel to Tirana, resulting in extra time and financial costs.”

- Executive director of a youth organisation in Dibra region

¹⁷ The information is available at Tirana Judicial District Court. Available online at: [Regjistri elektronik OJF](#)

¹⁸ Institute of Statistics “Business Registry”. Available online: <https://www.instat.gov.al/media/2hololz3/tab-1-nj%C3%ABsi-ligjore-aktive-sipas-form%C3%ABs-ligjore.xlsx>

¹⁹ The information was obtained by the Judicial District Court of Tirana through a request for information submitted by Partners Albania

1.1.2. State interference

The legal framework provides guarantees for the autonomy of NPOs. Organisations are free to regulate their internal structure and procedures, without mandatory state participation in governing bodies or state interference in the appointment of government body members. The framework does not require prior state approval for organisations to carry out their activities. Where licensing is required for specific areas of activity, such as for social and health services, or vocational education, this requirement is explicitly provided by law.²⁰ The legal framework also provides general mechanisms for protecting freedom of association, including constitutional guarantees,²¹ judicial remedies, police protection,²² and anti-discrimination safeguards.²³ While these safeguards are not specifically tailored to NPOs, they nonetheless provide the legal foundation for protecting freedom of association.

Regarding financial reporting, the regulatory framework considers the specific characteristics of NPOs and is adapted to their size and income. Under Albanian accounting regulations, NPOs whose assets or income do not exceed ALL 5 million (approx. 52,000 EUR) apply cash-based accounting and prepare only a cash flow statement accompanied by explanatory notes on the nature of their activities or services. NPOs whose assets or income exceed this threshold apply accrual-based accounting and prepare a full set of financial statements.²⁴

With regard to anti money laundering and counter terrorist financing (AML/CFT), in October 2025, the Ministry of Finance launched a public consultation the draft law “On some additions and amendments to the Law No. 9917, dated 19.05.2008, ‘On the Prevention of Money Laundering and Financing of Terrorism’, amended.”²⁵ This draft law introduced the wording “*non-profit organisations considered as high-risk*”. This wording was not consistent with FATF Recommendation 8 and raises several concerns. Specifically, it does not clearly define who determines such classification or on what basis, leaves room for subjective interpretation by authorities and carries a negative connotation that may damage the reputation of organisations placed under this category. These concerns were raised during the consultation process, but the recommendations were not considered, on the grounds that the proposed legal wording was maintained in order to ensure alignment with FATF standards and the principle of proportionality, while leaving the detailed criteria, procedures, and institutional responsibilities to be regulated through sublegal acts and the methodology of the National Risk Assessment.²⁶

This wording was not consistent with FATF Recommendation 8 and raised several concerns. Specifically, it did not clearly define who determined such classification or on what basis, left room for subjective interpretation by authorities, and carried a negative connotation that could damage the reputation of organisations placed in this category. These concerns were raised during the consultation process, but the recommendations were not

²⁰ Law No. 8788, dated 7.5.2001, “On Non-Profit Organisations”, Articles 6, 7, 20, and 34; Available at: <https://qbz.gov.al/eli/ligi/2001/05/07/8788>

²¹ Constitution of the Republic of Albania, article 46 <https://qbz.gov.al/preview/635d44bd-96ee-4bc5-8d93-d928cf6f2abd>

²² Republic of Albania. (2024). *Law No. 82/2024, on the State Police*. Available at: <https://asp.gov.al/wp-content/uploads/2025/08/Law-no.82-for-State-Police-26.7.2024-English.pdf>

²³ Republic of Albania. (2020). *Law No. 10 221, dated 4.2.2010, on Protection from Discrimination*. Available at: <https://www.kmd.al/wp-content/uploads/2021/04/Law-on-Protection-from-Discrimination-Albania.-2020.pdf>

²⁴ National Accountability Council, (2018), “*National Standards for NPOs Accountability*”. Available online at: <https://kkk.gov.al/udhezuesi-per-hartimin-e-raportit-jofinanciar/>

²⁵ The information is retrieved from the government consultation platform. Available at: <https://www.konsultimipublik.gov.al/Konsultime/Detaje/888>

²⁶ The information is retrieved from the government consultation platform. Available at: https://www.konsultimipublik.gov.al/documents/RENJK_888_Raporti-individual--i-Konsultimit-Publik.docx

accepted. The stated justification was that the proposed wording was retained to ensure alignment with FATF standards and the principle of proportionality, while detailed criteria, procedures, and institutional responsibilities would be regulated through secondary legislation and the National Risk Assessment methodology.

No legislative changes concerning beneficial ownership were introduced in 2025 and the provisions adopted under Law No. 6/2022, “On the Register of Ultimate Beneficial Owners”, amended, remained in force, stipulating administrative sanctioned ranging from 50,000 ALL (approx. 520 EUR) to 600,000 ALL (approx. 6,250 EUR).²⁷ According to the 2025 annual report issued by the National Business Center (NBC), the authority responsible for the registration of beneficial owners, 366 NPOs have applied to register their beneficial owners.²⁸ However, no data is available on the number of applications approved. Within the same report, penalties were imposed on commercial entities and NPOs that failed to carry out the initial registration or update beneficial ownership data within the legal deadlines, in accordance with applicable legal provisions. For 2025, 23 notifications were sent to reporting entities, based on information received from second-tier banks, concerning non-compliance in the Beneficial Owners Register data. This are not issued by entity type and as a consequence it is not possible to determine how many relate to NPOs specifically versus commercial entities. Partners Albania sent request for information to the NBC, but the authority failed to provide a response.

The Law for NPOs (Chapter VIII) and the Law on the Registration of NPOs (Sectioned V, Chapter II) regulate the main legal provisions for dissolution, liquidation, and deregistration of NPOs. Dissolution may take place voluntarily or by court decision in cases of unlawful activity, violation of the Constitution, improper establishment, or bankruptcy. Except in serious cases, the Court must first give the organisation an opportunity to remedy the violation. Deregistration is completed through the electronic register based on a final court decision, resulting in the loss of legal personality. The data of deregistered organisations remain publicly accessible in the register, marked as deregistered, while the organisation’s name cannot be reused for six months. There are no provisions on appeal.

In practice, no formal complaints concerning threats by government officials, interference in internal governance, or unannounced, excessive, or baseless inspections were reported to either the Ombudsperson or the State Police.²⁹ At the same time, the monitoring for the preparation of this report identified a limited number of cases, including one reported by KRIIK. On 13 March 2025, the Coalition for Reforms, Integration, and Consolidated Institutions (KRIIK) publicly raised concern over pressure on independent institutions and civil society ahead of the elections, criticising narrow interpretations of the misuse of public resources, warning against challenges to the independence of the Central Election Commission, and characterising statements by a sitting MP as intimidating toward election-monitoring organisations.³⁰

Similarly, the Financial Intelligence Agency (AIF) reported no suspicious activity reports linking NPOs to suspected terrorist financing, no restrictions on NPOs’ access to foreign funds through banking or non-banking

²⁷ Official Gazette 149/2022, Law No. 6/2022 “For some additions and amendments of Law No. 112/2020 “On the Register of Beneficial Owners”, amended. Available at: <https://qbz.gov.al/preview/caaa4106-aab1-44bb-a34b-1ada78851423/cons/20220216>

²⁸ National Business Center (2026) “2025 Annual Report”. Available at: <https://qkb.gov.al/wp-content/uploads/2026/03/Raport-Vjetor-2025.pdf>

²⁹ The information provided by the Ombudsperson and State Police was obtained through a request for information submitted by Partners Albania

³⁰ KRIIK, “*Intimidating statements against KRIIK and the CEC by the Chairman of the Parliamentary National Security Committee: a growing concern over the Socialist Majority’s attitude towards the Independent and Critical Voice of Civil Society and Independent Institutions*”, 2025, Available at: <https://kriik.al/home/en/2025/03/13/intimidating-statements-against-kriik-and-the-cec-by-the-chairman-of-the-parliamentary-national-security-committee-a-growing-concern-over-the-socialist-majoritys-attitude-towards-the-indepen/>

institutions, and no temporary freezing orders affecting NPO accounts or transactions during the year.³¹ No sanctions were reported by NPOs interviewed, neither.

Although no AML/CFT-related cases were reported in connection with the opening of bank accounts, one organisation involved in the process to register beneficial owners reported challenges that put its operations and access to funding at risk. The issue arose because the regional tax directorate had issued the NUIS certificate with an electronic stamp, which the National Business Centre (NBC), responsible for the registration of beneficial owners, did not recognise. This delay meant the organisation was unable to open a bank account in time, placing a grant opportunity at risk. After a month of meetings and negotiations with both institutions, the NBC eventually registered the organisation's beneficial owners.

With regard to dissolution, the Court, in its response to a request from Partners Albania, stated that 28 organisations are currently in liquidation or have been terminated; however, it did not provide the reasons for these decisions.

1.1.3. Access to financial resources

The legal framework allows NPOs to seek and secure financial resources from domestic and foreign sources to support their activities. This includes grants, donations, and other sources. Additionally, both foundations and associations are permitted to engage in passive investments,³² allowing them to “own movable and immovable assets, to generate incomes through the management of these assets”.³³

The legal framework allows NPOs to engage in economic activities as a means of generating income to support the achievement of their goals. Such activities may be carried out within the legal structure of the organisation, without the need to register a separate legal entity.³⁴ The economic activity must: (i) be consistent with the NPO's purpose and objectives; (ii) be declared as one of its sources of income; and (iii) not constitute the main activity or primary purpose for which an organisation is established. According to Decision No. 953, dated 29 December 2014, “On the Implementation of the Provisions of Law No. 92/2014 ‘On Value Added Tax in the Republic of Albania’”, as amended, the income derived from economic activity, as a secondary activity of the organisation, must not exceed 20% of its total annual income. In addition, Albania has a specific legal framework on social enterprises. However, as noted in previous Monitoring Matrix reports, the legal framework provides unclear definitions and cumbersome procedures, creating ambiguity in obtaining social enterprise status and accessing financial support.

With regards to donations, in January 2026 a draft law on donations and sponsorship was launched for public consultation from the Minister of State for Public Administration and Anticorruption in the frame of Cluster One “Fundamentals”. The aim of the draft law is to strengthen transparency and accountability in cases where public bodies receive donations and sponsorships. In addition, it also provides for the regulation of sponsorships involving other entities, including nonprofit organisations, thereby extending its scope beyond public bodies, which constitute the primary focus of the law. As presented, the draft raises concerns over the inclusion of

³¹ The information provided by the Financial Intelligence Agency was obtained through a request for information submitted by Partners Albania

³² Passive investment includes interest, dividends, capital gains and other income from investing the organisation's property.

³³ Art. 39/1 and 56/1 from the Civil Code for associations and foundations respectively.

³⁴ Law No. 8788, dated 7.5.2001, “On Non-Profit Organisations”. Available at: <https://qbz.gov.al/eli/ligj/2001/05/07/8788>

NPOs within its scope, as this is insufficiently justified and risks creating regulatory overlap and disproportionate administrative burdens. Concerns also arise in relation to the tax provisions which appear insufficiently harmonised with the existing tax framework and may create legal uncertainty regarding the fiscal treatment of sponsorship.³⁵ At the same time, alternative forms of fundraising, such as online crowdfunding, website-based donations, and charitable SMS or phone-call donations, remain insufficiently regulated and supported under the current legal framework.

In practice NPOs engage in economic activities. According to the response received by the Ministry of Health and Social Welfare there are 13 organisations that have received the status of “social enterprises”. For the period 2024 – 2025 three of these organisations have received financial support from the social enterprise fund at the total amount distributed of 13,450,000 ALL (approx. 140,000 EUR). However, access to finance remains the main challenge for NPOs engaged in social enterprise activities, alongside the lack of fiscal incentives and a restrictive legal framework characterised by unclear and burdensome criteria for obtaining and maintaining social enterprise status, mandatory employment and revenue thresholds, restrictions on salary-setting, annual external-audit requirements, extensive state involvement in internal governance, and a sanction-oriented approach, all of which constrain their sustainability, autonomy and future growth.

The interviews and focus group discussions indicated that NPOs do not face state-imposed restrictions on receiving funding from foreign sources. Participants consistently reported that foreign donors, particularly the European Union, remain their primary source of financial support. Rather than restrictions on foreign funding, they highlighted practical challenges related to the implementation of VAT exemption procedures, noting that public authorities should provide clearer and more comprehensive guidance to both NPOs and private entities on the applicable requirements and procedures.

With regard to the administrative burden associated with accessing private funding, interviews with NPOs indicated that organisations generally do not face significant administrative challenges when receiving financial support from individuals or companies. They also noted that individual giving through the Smile.al platform has become an important source of funding, particularly for newer organisations. In 2025, 14 organisations received financial support through donations made via the platform.

NPOs must open a bank account within 20 calendar days of tax registration and declare it to the tax authorities. In practice, banks’ AML procedures require identification documents for all governing body members, although this is not explicitly required by law. This creates administrative burdens, particularly when members reside abroad, highlighting the need for greater regulatory clarity.

Access to bank loans does not appear to be a viable source of financing for NPOs. No publicly available information or documented cases identified through the monitoring indicate that NPOs accessed bank loans during 2025. Furthermore, a review of the products offered by commercial banks and non-bank financial institutions found no loan products specifically tailored to the needs of the non-profit sector. Instead, available lending products are primarily targeted at individuals, SMEs, and commercial businesses.

³⁵ Partners Albania for Change and Development, 2026, Comments and Recommendations for the draft law “On donations and sponsorship”. Available at: <https://www.partnersalbania.org/News/comments-and-recommendations-on-the-draft-law-on-donations-and-sponsorships/>

1.2. Related freedoms

1.2.1. Freedom of Peaceful Assembly

The legal framework governing the right to freedom of peaceful assembly remained unchanged in 2025. As reported in previous Monitoring Matrix reports, Albania's legislation is generally aligned with international standards and guarantees the right to peaceful assembly without discrimination. Article 47 of the Constitution guarantees the right to peaceful and unarmed assembly, while Law No. 8773/2001, "On Assemblies", regulates the exercise of this right. The existing framework maintains prior notification requirements for public assemblies, provides for urgent assemblies under exceptional circumstances, establishes narrowly defined grounds for restricting assemblies, and imposes positive obligations on public authorities to facilitate and protect the exercise of the right to peaceful assembly. The legislation, however, continues not to explicitly regulate counter-assemblies.

The legal framework also does not impose blanket restrictions on assemblies and allows for judicial review of restrictive decisions. However, the principle of proportionality is not explicitly articulated, and the absence of clear provisions on the use of technical equipment and expedited remedies may create challenges in practice.

In practice, freedom of peaceful assembly is respected. According to the information provided by the State Police, a total of 22 notifications for public assemblies were submitted by NPOs in 2025. No cases of assemblies held without prior notification were reported, and no notifications for urgent assemblies were registered. The issues addressed through these assemblies covered a broad range of public interest concerns, including children's rights, anti-homophobia awareness, environmental protection, public services, traffic safety, opposition to the gender equality law, opposition to the Albania–Italy agreement on the accommodation of migrants, the protection of the Vjosa River, and the protection of public beach spaces. No cases of refusal of notifications for assemblies organised by NPOs were reported. In addition, the State Police indicated that there were no acts of violence by organisers or participants during assemblies organised by NPOs in 2025. According to the Ombudsperson, during 2025 no complaints were registered from NPOs, informal groups, activists, or media, that were related to organising and participating in peaceful assembly. Additionally, based on available information for 2025, no cases were identified of media or observers being prevented from accessing or reporting on NPO-organised public assemblies.

1.2.2. Freedom of Expression

The legal framework guarantees freedom of expression and access to information in line with international standards. Constitutional provisions ensure the right to seek, receive, and impart information, while restrictions are limited to those prescribed by law and pursuing legitimate aims. Limitation on freedom of expression, such as those related to hate speech and the fight against disinformation, are prescribed by law and are generally aligned with international standards. Article 17 of the Constitution provides that limitations on rights may be

established only by law, for a public interest or for the protection of the rights of others and must be proportionate and not exceed the limits allowed under the European Convention on Human Rights.³⁶

Hate speech is addressed through provisions in the Criminal Code.³⁷ In addition, legislation on audiovisual media, implemented by the Audiovisual Media Authority (AMA), requires audio and audiovisual media service providers to report news truthfully and objectively, while the 2023 Broadcasting Code prohibits hate speech content and defines hate speech broadly in line with European standards. Measures related to disinformation in Albania are not governed by a single dedicated legal framework. Instead, they are addressed through a combination of media regulation, electoral rules, and institutional and self-regulatory mechanisms.

During 2025, there have been important developments regarding amendments to the Penal Code. In July 2025, a draft Criminal Code was launched for consultation by the Ministry of Justice, raising serious concerns among NPOs. The proposed changes increased penalties removed the requirement that false information be knowingly disseminated and failed to fully decriminalise defamation in line with EU-related commitments. In December 2025, an initiative to remove criminal defamation provisions was advanced and consulted upon. However, on 27–28 January 2026, the Parliament adopted a revised package that fell short of full decriminalisation of defamation, extending protection only to “registered” or “recognised” journalists and failing to cover the wider public, including activists and NPOs.

In practice, according to Reporters Without Borders, Albania improved its position in the World Press Freedom Index, ranking 80th in 2025 compared to 99th in 2024.³⁸

In practice, no publicly recorded cases were identified of NPO representatives being sanctioned or otherwise persecuted for critical speech. However, expert interviews indicated that defamation cases continue to be brought before the courts, although no information is available on whether these involved NPOs, media organisations, or other individuals. At the same time, the Human Rights Defenders Report for Albania – 2025 documents the use of strategic lawsuits against public participation (SLAPPs) against environmental and community activists.³⁹ A hydropower company filed defamation and insult claims against three activists from Mirdita after they publicly denounced the environmental damage caused by hydropower plants in a protected national park. Legal experts identified the case as a clear SLAPP, noting the weak factual basis of the claims and the disproportionate fines sought, which ranged from 50,000 ALL to 3,000,000 ALL (approximately EUR 524 to EUR 31,440). The lawsuit was widely viewed as an attempt to discourage public participation by subjecting the activists to lengthy and costly legal proceedings. Although the company withdrew from the proceedings in January 2026 by failing to appear before the court, the report notes that the activists continued to face intimidation through coordinated online smear campaigns and paid social media content targeting both the activists and independent media.

³⁶ Constitution of the Republic of Albania. Available at: <https://klgj.al/media/hvdbnqvu/law-no-76-2016-constitution-of-the-republic-of-albania-as-amended-revised-2021.pdf>

³⁷ Law No. 7895, dated 27.1.1995, "Criminal Code of the Republic of Albania", as amended, Articles 265 and 266. Available at: <https://qbz.gov.al/eli/ligj/1995/01/27/7895>

³⁸ Reporters Without Borders (2026), World Press Freedom Index 2025. Available at: <https://rsf.org/en/country/albania>

³⁹ Civil Rights Defenders, 2026, "Human Rights Defender Report for Albania – 2025". Available at: https://acqi.al/wp-content/uploads/2026/05/HRD-Albania-2025-updated.pdf?utm_source

1.2.3. Open, safe, and secure civic spaces

The legal framework protects the right to communicate, access information, and exercise freedom of expression online and is generally aligned with international standards. These guarantees are enshrined in the Constitution of Albania,⁴⁰ which protects freedom of expression, the right to information, and the protection of personal data, and are generally understood to extend to the digital sphere. No legal restrictions were identified that specifically limit NPOs' access to information. Safeguards against unjustified monitoring of communications are established through the Criminal Procedure Code, which permits interception only based on a court order in the context of criminal investigations. These safeguards are complemented by the Law on Electronic Communications,⁴¹ which guarantees the confidentiality and security of electronic communications, and by the Law on Personal Data Protection,⁴² which establishes the general principles governing the protection and processing of personal data.

Regarding safeguards against threats, harassment, and attacks, the legal framework provides general mechanisms for reporting incidents, seeking protection, and accessing judicial remedies. These include the Ombudsperson, law enforcement authorities, the judiciary, and specialised reporting channels for cybercrime, which are available to NPO representatives and human rights defenders. In October 2025, the Government approved the National Cyber Security Strategy 2025–2030 and its accompanying Action Plan 2025–2027,⁴³ aimed at strengthening the protection of digital infrastructure and further aligning Albania's cybersecurity framework with EU and NATO standards. Law No. 25/2024 "On Cybersecurity",⁴⁴ establishes a comprehensive national cybersecurity framework, including cybersecurity requirements, and incident reporting obligations. NPOs affected by threats or attacks may seek protection or redress through the competent authorities, including law enforcement agencies, courts, the Ombudsperson in matters involving public authorities, and the Commissioner for the Right to Information and Protection of Personal Data where issues relate to access to information or the processing of personal data.

Despite the existence of legal safeguards, research to date⁴⁵ raises questions about their implementation in practice, a concern echoed by the NPOs interviewed. Attention was drawn to the Government's continued investment in surveillance technologies, including the "Smart City" initiative,⁴⁶ which envisages the wider deployment of camera-based monitoring systems with advanced identification capabilities. While the initiative has been presented as a measure to strengthen public safety, NPOs and digital rights experts have questioned

⁴⁰ Official Gazette No. 28/1998, Constitution of the Republic of Albania, adopted on 21 October 1998, as amended. Available at: <https://qbz.gov.al/preview/635d44bd-96ee-4bc5-8d93-d928cf6f2abd>

⁴¹ Official Gazette No. 96/2024, Law No. 54/2024, dated 30.5. 2024, "On Electronic Communications in the Republic of Albania". Available at: <https://qbz.gov.al/eli/ligj/2024/05/30/54/b6aa032c-a862-4bc3-816d-5cf7c600ac9e;q=LIQJ%20Nr.%2054%2F2024%20P%C3%8BR%20KOMUNIKIMET%20ELEKTRONIKE%20N%C3%8B%20REPUBLIK%C3%8BN%20E%20SHQIP%C3%8BRIS%C3%8B>

⁴² Official Gazette, Law No. 124/2024, dated 19.12.2024, "On Personal Data Protection". Available at: <http://qbz.gov.al/eli/ligj/2024/12/19/124>

⁴³ National Authority for Cyber Security, National Cyber Security Strategy 2025–2030 and Action Plan 2025–2027. Available at:

<https://aksk.gov.al/en/the-national-cyber-security-strategy-2025-2030-and-action-plan-are-approved>

⁴⁴ Law No. 25/2024 "On Cybersecurity," Available at: <https://aksk.gov.al/wp-content/uploads/2024/05/ligj-2024-03-21-25-5-1.pdf>

⁴⁵ Albanian Center for Quality Journalism (ACQJ), Human Rights Defenders Report for Albania – 2025, published May 2026. Available at: [Human Rights Defenders Report for Albania – 2025](https://humanrightsdefendersreportforalbania.org/).

⁴⁶ Ministry of Interior of the Republic of Albania, "Smart City Albania", 19 December 2025. Available at: https://mb.gov.al/en/newsroom/smart-city-albania/?utm_source

whether the current legal and institutional safeguards provide sufficient transparency, oversight, and accountability for the collection and use of personal data.⁴⁷

Although these safeguards apply equally to all individuals and legal entities, interviews with NPOs working on digital rights raised concerns about the effectiveness of oversight mechanisms and their implementation in practice. These concerns were reflected in several developments during 2025. The LGBTQ+ Pride Parade, held on 24 May under the theme “Side by Side,” prompted widespread homophobic comments and hate speech, although none were attributed to state actors. A study by the Albanian Women Empowerment Network (AWEN), based on a survey of 22 women human rights defenders, found that 50% reported experiencing harassment or threats related to their work, including online and offline harassment and death threats. The study also documented smear campaigns and derogatory labelling of defenders as “anti-family,” “foreign agents,” or “Soros-funded”.⁴⁸

Hostile narratives concerning civil society became particularly visible following the termination of USAID funding. Certain political and media actors used the suspension of foreign assistance to question the legitimacy, independence, and transparency of internationally funded NPOs, portraying them as externally driven or politically motivated. Amplified through online platforms and parts of the media, these narratives caused reputational harm and increased hostility towards organisations working on human rights, gender equality, LGBTI rights, and other public-interest issues. Similar dynamics emerged during consultations on the draft law on gender equality, when conservative groups claimed that the legislation would “invent” new genders and legitimise same-sex marriage. Television debates further intensified online hate speech against LGBTQ+ people, activists, and organisations supporting the law. More broadly, the 2025 EU Report confirms that freedom of expression continued to face constraints in practice, including political pressure, economic influence, institutional opacity, and attacks or threats against journalists.⁴⁹

Expert interviews indicate that gender-focused protests are frequently misrepresented in media coverage, disproportionately focusing on LGBTQ+ participants rather than the underlying demands for gender equality, and that LGBTQ+ organisations report increasing backlash amplified by certain media outlets, religious figures, and members of parliament who frame LGBTQ+ activism as a threat to traditional values. Transgender individuals are reported as particularly targeted, with resulting public hostility undermining organisations' ability to carry out their work and hold peaceful assemblies.

No incidents of attacks or harassment against NPOs, NPO representatives, or activists were reported to the State Police or the Ombudsperson during 2025. No organisations reported cases of unjustified monitoring or unlawful collection of users' information, and no NPOs reported unjustified monitoring of their own communication channels.

⁴⁷ Albanian Center for Quality Journalism (ACQJ), Human Rights Defenders Report for Albania – 2025, published May 2026. Available at: [Human Rights Defenders Report for Albania – 2025](#).

⁴⁸ Albanian Women Empowerment Network (AWEN), Women as Human Rights Defenders in Albania, 2025. Available at: <https://awenetwork.org/media/682f2843bb7b1.pdf>

⁴⁹ European Commission, Albania 2025 Report, SWD (2025) 750 final, accompanying the 2025 Communication on EU Enlargement Policy. Available at: https://enlargement.ec.europa.eu/document/download/fe9138b7-90fe-4277-a12c-3a03f6d1957f_en?filename=albania-report-2025.pdf

Area 2: Framework for NPO Financial Viability and Sustainability

2.1. Tax/fiscal treatment for NPOs and their donors

2.1.1. Tax Benefits

Based on the legislation in place, incomes from traditional non-profit sources of NPOs such as private or corporate donations, grants and membership fees are not subject to the Value Added Tax (VAT). However, if an NPO engages in economic activities to generate income for funding its mission-related activities, it is considered a taxable entity and must register for VAT, regardless of the purpose of the activity. An exception applies to NPOs involved in social, educational, cultural, or sporting activities, referred to as "activities of general interest," which are exempt from VAT Law (Art. 51, points ë, f, i, j, k), further detailed by the Decision of Council of Minister No. 953, dated 29.12.2014 "For Implementation of Dispositions of Law nr. 92/2014", "For Value Added Tax in the Republic of Albania", amended.⁵⁰ Goods and services should be offered based on approved prices by competent authorities. NPOs should meet three criteria at once to qualify for the exemption: (i) the governing bodies should not have a vested interest in the activity of the foundation; (ii) the not-for-profit activity should precede the economic activity; and (iii) the total income from economic activity, as a secondary activity of the foundation, should not be higher than 20% of the total annual income. The VAT exemption procedure (Art.3) requires submission to the Regional Tax Office of a set of documents such as registration court decision, statutes and incorporation act; statement of all services and goods offered and price list; mission statement and main programmatic areas; list of beneficiary groups; and financial resources including expected income from economic activity. The VAT exemption is valid for three years for the right of renewal. When applied for the first time, the status is valid for one year.

Following the instructions issued in February 2025, progress has been made in the formal issuance of VAT exemption certificates by SASPAC for donor-funded projects. The new provisions establish clearer procedures for applying VAT exemptions to grant agreements funded through bilateral agreements between the Albanian government and foreign governments and ratified by Parliament. The exemption is now operational and represents an important step in reducing the financial burden on NPOs and addressing a long-standing concern raised by civil society organisations and other stakeholders.

While the VAT exemption represents a positive development, challenges remain in its practical implementation. NPOs reported difficulties particularly when working with private service providers. Based on information collected from NPOs, including during the focus group discussion, some providers are reluctant or refuse to apply the exemption. In some cases, this is due to limited knowledge or understanding of the procedure. In

⁵⁰ Decision of Council of Ministers No. 953 dated 29.12.2014 "For Implementation of Dispositions of Law nr. 92/2014", "For Value Added Tax in the Republic of Albania", amended. Available at: <https://www.tatime.gov.al/shkarko.php?id=13683>

other cases, providers are aware of the procedure but still prefer not to apply it due to administrative concerns or reluctance to engage with the tax authorities.

As a result, NPOs often must explain the procedure to providers, support them through the process, or look for other providers willing to apply the exemption. While the General Directorate of Taxation has undertaken awareness-raising efforts, including through information notices, guidance materials and instructional videos, further outreach and practical guidance for NPOs, private service providers and the Tax Administration, particularly outside Tirana, are still needed to ensure full and effective implementation of the VAT exemption. Bank interest is subject to a 15% withholding tax. However, income paid to NPOs that qualify for exemption from corporate income tax under Article 27 of Law No. 29/2023 is not subject to withholding tax.

In practice, none of the NPOs participating in this monitoring exercise reported experiencing a hidden tax on grants. Interviews with organisations working in social entrepreneurship indicate that the use of available tax benefits for economic activities remains limited, reflecting the narrow scope of the applicable provisions, lack of clarity in their practical application, and administrative and tax compliance requirements. None of the organisations consulted reported income from passive investments. At the same time, no publicly available data were identified on the number of NPOs generating such income, and the tax authorities did not provide this information in response to Partners Albania's request.

While the VAT exemption represents an important step towards alleviating the financial burden on NPOs and simplifying related procedures, its effectiveness will depend on consistent implementation by the relevant institutions and private providers and greater awareness among stakeholders involved in grant management and taxation. When asked about the number of Project Registration Certificates issued to NPOs, SASPAC indicated that an exact figure could not be provided, as the available data do not differentiate between NPOs and other applicant entities.

NPOs reported challenges in the practical application of the VAT exemption for foreign-funded grants, particularly in relation to private service providers. According to information gathered from NPOs, including through the focus group discussion, service providers have sometimes been reluctant or refused to apply the exemption due to limited awareness or understanding of the applicable requirements. NPOs have therefore often had to explain the requirements and assist providers in navigating the process. This highlights the need for targeted guidance and awareness-raising for businesses involved in the application of the VAT exemption.

2.1.2. Incentives for giving

The legal framework in Albania provides limited tax incentives for donations. Corporate donations are primarily regulated through the existing tax legislation and the Law on Sponsorship⁵¹ which allows deductions within defined thresholds of 3 to 5 percent and only for specific categories of activities, such as culture, education, and sports. However, this framework does not establish a comprehensive system of incentives for philanthropic giving, as it excludes certain areas of public benefit, including democracy and human rights, and does not recognise individual donations for tax deduction purposes. In February 2026, a draft Law "On Donations and

⁵¹ Law No. 7892, dated 21.12.1994, "On Sponsorships," amended by Law No. 9807, dated 20.09.2007. Available at: <https://portavendore.al/wp-content/uploads/2018/05/Ligji-nr.7892-date-21.12.1994-Per-sponsorizimet.pdf>

Sponsorships in the Republic of Albania" was introduced,⁵² aimed at strengthening transparency and accountability in cases where public bodies receive donations and sponsorships and providing for the regulation of sponsorship involving other entities.

This draft law has been prepared in the context of Albania's obligations within the European integration process, as part of the broader package of anti-corruption legislation. Against this background, the inclusion of non-profit organisations within the scope of the draft law raises significant concerns. Although the stated purpose of the law is to enhance transparency and accountability in relation to public bodies, the draft extends certain obligations to NPOs, despite the fact that they do not exercise public authority functions and are already subject to existing financial and reporting obligations. In this regard, subjecting NPOs to the National Electronic Register of Donations and Sponsorships would create regulatory overlap, impose an additional and unjustified administrative burden, and risk disproportionate interference with their freedom of association and access to resources. NPOs actively engaged in the consultation process, submitting comments and recommendations on these and other provisions of concern. Their contributions highlighted the potential implications for the sector and proposed amendments aimed at addressing these concerns and ensuring a more proportionate and enabling regulatory framework for civil society.⁵³

As of today, there is no dedicated policy framework currently exists to promote structured cooperation between NPOs and the private sector. The Albanian ESG Network⁵⁴, bringing together ten of the country's largest companies, may signal emerging interest in this area, particularly given its stated aim of strengthening cooperation with government and international partners, but its practical relevance for NPO-private sector collaboration remains to be assessed.

In practice, annual monitoring data confirm NPOs' central role in Albania's philanthropic ecosystem, accounting for 58% of total donation value as beneficiaries or intermediaries.⁵⁵ Campaigns generated 97% of donations to NPOs, while 99.24% of contributions were monetary. This reliance on campaign-based financial giving, with limited in-kind support, professional services or volunteering, indicates weak long-term donor engagement. Most donations supported marginalised groups, poverty relief, health and education, reflecting the role of NPOs in addressing unmet social needs. Individuals remained a major source of donations despite the absence of tax incentives for individual giving.

2.2. State support

2.2.1. Public funding availability

Public funding for NPOs in Albania is provided through the state budget and channelled through different public institutions, with the Agency for the Support of Civil Society (ASCS) serving as the main mechanisms for

⁵² Draft Law "On Donations and Sponsorships in the Republic of Albania," announced February 2026. Available at: <https://www.konsultimipublik.gov.al/Konsultime/Detaje/920>

⁵³ Partners Albania for Change and Development, 2026, "Comments and Recommendations to the draft law "On donations and sponsorships". Available at: <https://www.partnersalbania.org/News/comments-and-recommendations-on-the-draft-law-on-donations-and-sponsorships/>

⁵⁴ Albanian ESG Network, founding members: Titan Albania, Philip Morris International, Deloitte, Grant Thornton, Intracom, Coca-Cola Bottling Shqipëria, Balfin Group, Vodafone Albania, Kastrati Group, and Alumil. Available at: <https://esgalbania.org/homepage>

⁵⁵ Partners Albania for Change and Development, 2026, "Philanthropy Magazine" Available at: https://www.partnersalbania.org/wp-content/uploads/2025/07/Philanthropy_Magazine_Ed10.pdf

providing financial support to NPOs. Article 16 of the ASCS Law stipulates that the budget of the ASCS is provided as a separate line in the annual state budget and may not be lower than in the preceding year.⁵⁶

However, the annual state budget does not provide a single, consolidated figure for public funding allocated to NPOs, as funding is distributed across different institutions and programmes, including the ASCS and various line ministries. As a result, the total amount of public funding planned for NPOs is not easily identifiable from a unified source, limiting transparency and making it difficult to assess the overall level of public support to the sector. As regards funding administered through the ASCS, the state budget allocation covers both financial support to civil society organisations and the Agency's own operational costs. Consequently, it is difficult to clearly distinguish the amount specifically earmarked for financial support to NPOs.

The legal and institutional framework provides for the participation of civil society representatives in the Agency's governance structures, including representation on its governing board, and establishes a formal basis for consultation with NPOs on funding priorities and programmes. Conflict-of-interest safeguards are also addressed under the legal framework. However, key elements of meaningful participation remain insufficiently regulated in practice. Funding priorities are determined in line with government priorities. Funding priorities are formulated within the broader framework of government priorities, while mechanisms for the systematic involvement of NPOs in monitoring and evaluation could be further strengthened. Further changes to the institutional framework of the ASCS are currently being considered as on February 2026,⁵⁷ a draft amendment to the Law on the ASCS was launched for public consultation. The draft aims to shift the institutional dependency of the Agency from the Prime Minister to the Ministry of Health and Social Welfare, in line with SIGMA recommendations related to the organisation and coordination of public administration. However, it does not reflect the measures concerning the Agency set out in the Roadmap for the Functioning of Democratic Institutions.

In practice, public support for NPOs in Albania is provided predominantly through project-based grants. Institutional (core) funding is not available as a dedicated funding scheme, while co-financing for EU and other donor-funded projects remains limited and is not provided through a systematic or widely accessible mechanism. According to information provided by the ASCS, financial support to NPOs in 2025 amounted to ALL 107,600,000 (approximately EUR 1.12 million), benefiting 75 organisations out of 160 applicants. This represents an increase of 11.5% compared with 2024, when ALL 96,500,000 (approximately EUR 1.01 million) was provided. Despite this increase, the overall level of funding remains limited to address the needs of the sector.

The 2025 ASCS call for proposals covered a broad range of thematic priorities. Good governance and anti-corruption accounted for 50.74% of the total budget; social inclusion, women's rights and the empowerment of marginalised groups for 7.06%; economic development, employment and innovation for 10.5%; environmental protection and green transition for 9.8%; and culture, education, health and heritage for 11.9%. A further 10% supported projects addressing more than one priority area. While the call therefore covered diverse thematic areas, more than half of the funding was directed towards good governance and anti-corruption. According to the ASCS, this concentration reflects the implementation of national strategic frameworks, including the Intersectoral Strategy Against Corruption and the National Strategy for Development

⁵⁶Official Gazette No. 37/2009, Law No. 10093, dated 9 March 2009, "On the Organisation and Functioning of the Agency for the Support of Civil Society". Available at: <http://qbz.gov.al/eli/ligj/2009/03/09/10093>

⁵⁷The information is retrieved from the government consultation platform. Available at: <https://konsultimipublik.gov.al/Konsultime/Detaje/936>

and Integration, under which good governance, the fight against corruption and public legal education constitute a mandatory priority. With regard to co-financing, the ASCS confirmed that no dedicated scheme for EU or other donor-funded projects was launched in 2025. Where applicants identified other co-financing sources, these were considered part of the overall financial structure of the proposal rather than supported through a specific public co-financing mechanism.

Public funding for NPOs is also channelled through other public institutions. In 2025, the Ministry of Justice, through the Free Legal Aid Directorate, allocated ALL 8,000,000 (approximately EUR 83,900) from the state budget to support NPOs authorised to provide state-guaranteed primary legal aid. Of this amount, ALL 4,657,145 (approximately EUR 48,800) was disbursed on the basis of the submitted funding proposals. Eight NPOs applied and four were selected, with support provided in the form of service contracts.⁵⁸

The Ministry of Culture, Tourism and Sport in 2025 provided financial support to non-profit organisations in the form of grants, with a total state budget allocation of ALL 213,200,000 (approximately EUR 2.23 million). A total of 309 NPOs applied for funding, of which 143 were selected and supported.⁵⁹ It's worth mentioning that this amount does not refer exclusively to funding of NPOs as the call supported other entities and individual.

Public funding for civil society was also channelled through the National Youth Agency (NYA). In 2025, under Public Call No. V, the NYA supported 32 projects implemented by youth organisations and organisations for young people, with a total value of ALL 89,994,499 (approximately EUR 920,000).⁶⁰ The projects covered 42 municipalities and were expected to reach more than 25,000 young people, supporting initiatives in areas including technology and entrepreneurship, culture and sport, social well-being and civic participation, in line with the National Youth Strategy 2022–2029.⁶¹

While public funding for NPOs is available and covers several thematic areas, it remains limited in scope, largely project-based, and primarily aligned with government-defined priorities. The absence of institutional funding, the lack of a consolidated funding framework, and the limited availability of co-financing mechanisms indicate that public funding does not respond to the needs of the civil society sector. Furthermore, during expert discussions and focus groups, NPOs reported that public funding remains insufficient to support their operations, particularly in the context of declining foreign financial support. This challenge is especially acute for organisations providing social services to marginalised groups.

Regarding the involvement of NPOs in setting funding priorities, the ASCS undertook a consultation process in preparation for Call for Proposals. Six consultation meetings were organised with civil society organisations in Vlorë, Berat, Korçë/Pogradec, Kukës, Shkodër and Tirana.⁶² The discussions addressed challenges faced by NPOs, the need for more sustainable institutional support, cooperation between civil society and public institutions, and proposals for improving funding policies. Organisations unable to participate were also invited to submit their suggestions in writing. According to the ASCS, the findings and proposals emerging from these consultations were compiled with a view to their inclusion in the call for proposals.⁶³ Nevertheless, the final call

⁵⁸ The information was obtained through a request for information submitted by Partners Albania

⁵⁹ The information was obtained through a request for information submitted by Partners Albania

⁶⁰ National Youth Agency, 2025. Available at: https://rinia.gov.al/wp-content/uploads/2025/08/lista-fituese-thirrja-V-web.pdf?utm_source

⁶¹ National Youth Agency, 2025, "Signing of Contracts with the Winning Organisations of Call V," Available at: https://rinia.gov.al/nenshkrimi-i-kontratave-me-organizatat-fituese-te-thirrjes-v/?utm_source

⁶² Agency for the Support of Civil Society, 2025 "Ditari No. 32, January–June 2025", pp. 5–6. Available at: https://amshc.gov.al/wp-content/uploads/2025/07/AMSHC-Ditar_janar-qershor-2025.pdf?utm_source

⁶³ Ibid, pg. 6

continued to operate within the framework of government-defined strategic priorities: while it covered five broad thematic areas, it explicitly indicated that priority would be given to project proposals addressing indicators identified under strategies approved by the Government.⁶⁴ Also, NYA organised two online information sessions for prospective applicants. The aim was to facilitate participation of NPOs in the funding procedures rather than on involving in the formulation of the funding priorities themselves.⁶⁵

Beyond central-government funding, public funding for NPOs is also provided at the local level, although its availability and scale vary considerably across municipalities. Of the 41 municipalities that responded to Partners Albania's request for information, 8 (19 %) reported providing some form of financial support to NPOs in 2025.

In 2025, eight municipalities reported awarding grants to NPOs. The total amounts distributed varied significantly, ranging from ALL 100,000 (approximately EUR 1,000) in Gramsh to ALL 44.5 million (approximately EUR 464,000) in Shkodër. Where data were available, between two and three NPOs received grants per municipality. However, several municipalities did not provide complete information on calls for proposals, applications submitted, or individual grant amounts.

Table 1: Public funding from public institutions at local level during FY 2025.

Municipality	Number of calls for proposals	Total applications submitted	Awarded NPOs	Minimum and maximum amount per grant	Total Amount distributed FY 2024
Patos	1	4	2	Min.: 1,200,000 ALL (approx. EUR 12,600) Max.: 1,800,000 ALL (approx. EUR 18,800)	3,000,000 ALL (approx. EUR 31,400)
Gramsh	N/A	N/A	N/A	N/A	100,000 ALL (approx. EUR 1,000)
Përmet	1	3	3	Min.: 1,000,000 ALL (approx. EUR 10,500) Max.: 2,000,000 ALL (approx. EUR 20,900)	6,000,000 ALL (approx. EUR 62,800)
Lezhë	1	5	2	N/A	4,000,000 ALL (approx. EUR 41,800)
Shkodër	N/A	N/A	2	Min.: 19,530,000 ALL (approx. EUR 203,000) Max.: 24,970,000 ALL (approx. EUR 260,000)	44,500,000 ALL (approx. EUR 464,000)

⁶⁴ Agency for the Support of Civil Society, 2025, "Call No. 18 for Project Proposals". Available at: https://amshc.gov.al/thirrje-nr-18-per-projekt-propozime-13-maj-2025-deri-13-qershor-2025/?utm_source

⁶⁵ National Youth Agency, 2025, "Online Information Sessions for Public Call No. V for Project Proposals for Youth Organisations and Organisations for Young People". Available at: https://rinia.gov.al/en/sesionet-informuese-online-per-thirrjen-publike-nr-v-per-projekt-propozime-per-organizatat-rinore-dhe-per-te-rinjte/?utm_source

Kamëz	1	6	2	N/A	3,000,000 ALL (approx. EUR 31,400)
Mat	N/A	N/A	2	Min.: 480,000 ALL (approx. EUR 5,000) Max.: 2,850,000 ALL (approx. EUR 29,800)	3,330,000 ALL (approx. EUR 34,800)
Kukës	1	7	2	N/A	900,000 ALL* (approx. EUR 9,400)

2.2.2. Public Funding Distribution

The distribution of public funding to NPOs is governed by a legally binding but fragmented framework. In the case of ASCS, grant-making is regulated by Law No. 10093/2009 “On the organisation and functioning of the ASCS”, its Statute, as amended, and relevant implementing and internal acts.⁶⁶ These establish the institutional basis for the announcement of calls, submission and assessment of applications, selection of projects and contracting of beneficiaries.⁶⁷ Public calls and funding priorities are published in advance, providing a degree of procedural transparency and predictability. However, this level of regulation applies primarily to funding administered by the ASCS. There is no single regulatory framework or common procedure governing all public funding provided to NPOs by ministries, agencies and other public institutions. As a result, selection procedures, timelines, disclosure practices and opportunities for review or complaint vary considerably between funding schemes, while no unified calendar of calls or consolidated reporting mechanism provides an overall picture of funding opportunities and awards.

These shortcomings are explicitly recognised in the Roadmap for the Functioning of Democratic Institutions.⁶⁸ The Roadmap provides for the improvement, by the end of 2025, of administrative procedures for the management of all public funds supporting civil society, including those administered by the ASCS. It also envisages the full operationalisation of the online platform for monitoring grant procedures by the end of 2025 and an increase in public funding from 2026 to strengthen the capacity of NPOs to perform their role as service providers. However, implementation of the measures scheduled for completion in 2025 remains ongoing. According to information provided by the ASCS during the interview conducted for this assessment, the online grants-monitoring platform is still under development. The ASCS indicated that the National Agency for Information Society (AKSHI), as the institution responsible for the technical development of the platform, is leading this process.⁶⁹ Consequently, while steps towards implementation have been taken, the Roadmap target of having the platform fully operational by the end of 2025 has not been met.

⁶⁶ Official Gazette 37/2009, Law No. 10093, dated 9.3.2009, On the Organisation and Functioning of the Agency for the Support of Civil Society Available at: <http://qbz.gov.al/eli/ligj/2009/03/09/10093>; Council of Ministers Decision No. 769/2009, On the Approval of the Statute of the Agency for the Support of Civil Society, Available at: https://amshc.gov.al/wp-content/uploads/2026/04/vendim-2009-07-15-769-statuti-i-amshc.pdf?utm_source

⁶⁷ The information is retrieved from the ASCS website. Available at: https://amshc.gov.al/thirrje-nr-18-per-projekt-propozime-13-maj-2025-deri-13-qershor-2025?utm_source

⁶⁸ Official Gazette 168/2024, Council of Ministers Decision No. 611, dated 2 October 2024, “On the Approval of the Roadmap for the Functioning of Democratic Institutions”. Available at: <http://qbz.gov.al/eli/vendim/2024/10/02/611>

⁶⁹ Information provided by representatives of the Agency for the Support of Civil Society (ASCS) during an interview conducted by Partners Albania

Conflict-of-interest safeguards are established through the general legal framework applicable to public officials. Law No. 9367/2005 “On the Prevention of Conflict of Interest in the Exercise of Public Functions”, as amended, establishes rules for identifying, declaring, preventing and managing conflicts of interest in public decision-making.⁷⁰ These safeguards are complemented, within individual funding procedures, by specific requirements intended to protect the impartiality of the selection process. In the case of ASCS the application package of the call for proposals includes a dedicated declaration on conflict of interest.⁷¹ These requirements complement the broader legal framework for preventing and addressing conflicts of interest, although their effectiveness ultimately depends on consistent implementation throughout the evaluation and decision-making process.

Transparency concerning funding decisions remains uneven. Assessed against the minimum standard of publishing the identity and contact details of beneficiaries, the amount awarded and sufficient information on the objectives and activities of each supported project, none of the main funding institutions examined fully meets all disclosure elements. The ASCS publishes information on beneficiary organisations and funding awards, but information on project objectives and activities is not provided in the published results⁷². The Ministry of Culture, Tourism and Sports publishes information on beneficiaries and supported projects, but the available information does not consistently provide the complete financial and substantive details required to reconstruct individual awards.⁷³ NYA publishes the titles and funding amounts of winning projects, but not the names of beneficiary organisations. In the case of the Ministry of Justice, transparency is partly ensured through the publication of the register of authorised NPOs providing state-guaranteed primary legal aid, which includes information on beneficiary organisations, their geographical coverage and, where applicable, financing contracts. However, the register does not systematically disclose the amount of funding received by each organisation or detailed information on the activities and results financed.⁷⁴ These different practices further illustrate the absence of a common disclosure standard for public funding to NPOs.

The effectiveness of mechanisms for challenging funding decisions remains difficult to assess. According to information provided by the ASCS, two complaints were submitted in relation to the 2025 funding procedure; however, neither resulted in a re-evaluation of the applications concerned.⁷⁵ Evidence gathered through interviews and focus-group discussions indicates that some NPOs refrain from applying for public funding, because of concerns regarding the fairness and effectiveness of funding procedures.

The accessibility of ASCS funding is further affected by the administrative requirements imposed on applicants. The documentation required under the call for proposals includes a substantial set of legal, financial and administrative documents and declarations, in addition to the project proposal itself. The call explicitly warns that failure to submit even one document in the prescribed form results in automatic disqualification. Applicants are required to provide, among other documents, evidence relating to legal registration and status,

⁷⁰ Official Gazette 31/ 2005, Law No. 9367, dated 7.4.2005, On the Prevention of Conflict of Interest in the Exercise of Public Functions, as amended. Available at: <http://qbz.gov.al/eli/ligj/2005/04/07/9367>

⁷¹ ASCS, Call No. 18 for Project Proposals, application documentation, including the Conflict of Interest Declaration. Available at: https://amshc.gov.al/thirrje-nr-18-per-projekt-propozime-13-maj-2025-deri-13-qershor-2025/?utm_source

⁷² ASCS, 2026 “Annual Report 2025”. Available at: https://amshc.gov.al/wp-content/uploads/2026/02/raporti-Vjetor-i-veprimtarise-AMSHC-per-vitin-2025_compressed.pdf?utm_source

⁷³ The information is retrieved by the former Ministry official webpage. Available at: https://turizmi.gov.al/njoftim-mbi-thirrjen-per-mbeshtetje-financiare-te-projekteve-ne-turizem-per-vitin-2025-2/?utm_source

⁷⁴ Ministry of Justice, “List of 14 NPOs authorised to provide state-guaranteed primary legal aid”, Available at: https://www.drejtesia.gov.al/lista-e-ojf-ve-14-ojf-te-autorizuara-nga-ministri-i-drejtësisë-per-ofrimin-e-sherbimit-te-ndihmes-juridike-paresore/?utm_source

⁷⁵ The information was obtained through a request for information submitted by Partners Albania

tax compliance, banking details and a series of declarations, together with additional documentation where applicable. Some documents must be recent and/or submitted in original or certified form. While these requirements serve legitimate eligibility and accountability purposes, their cumulative effect can create a disproportionate administrative burden, particularly for smaller organisations with limited staff and resources and for organisations located outside Tirana. The requirement to obtain certain court documentation in Tirana further increases the time and cost involved. Against a standard of simple and proportionate application requirements, there is therefore scope to simplify the application stage and to require documentation that is necessary only for contracting from successful applicants rather than from all applicants.

At the local level, transparency in the distribution of public funding to NPOs remains uneven, reflecting the diversity of funding mechanisms and practices across municipalities. A more structured approach has been introduced through the ReLOaD programme and its LOD methodology,⁷⁶ which promotes open and competitive calls, civil society participation in identifying funding priorities, transparent evaluation procedures, and publication of information on funding decisions.⁷⁷ However, this practice is not applied uniformly across all municipalities or all forms of municipal support to NPOs. Funding may also be provided through service contracts, transfers or other forms of direct cooperation, for which the level of publicly available information varies.

2.2.3. Public Funding Accountability

The legal framework provides requirements for accountability and monitoring in the distribution of public funds to NPOs. Law No. 10093/2009, its implementing acts and the contractual arrangements governing beneficiaries' grants establish requirements concerning the implementation of funded projects, use of funds, reporting and monitoring. NPOs are required to implement activities and expenditure in accordance with the approved project and budget and to comply with narrative and financial reporting requirements. Monitoring forms part of the funding cycle and includes the review of project implementation and financial compliance, complemented by on-site monitoring where appropriate. The ASCS 2025 Annual Report confirms that field monitoring of funded projects was carried out during the year. Similar accountability requirements may apply under funding schemes administered by other public institutions through the specific contractual arrangements governing each scheme.

The legal framework also contains mechanisms for addressing irregularities in the management and use of public resources. Law No. 10296/2010 "On Financial Management and Control", as amended, establishes the general framework for sound financial management, internal control and accountability within public-sector entities,⁷⁸ while Law No. 112/2015 "On Public Financial Inspection" provides a framework for financial inspection where irregularities concerning public funds are identified.⁷⁹ In the case of ASCS funding, beneficiary

⁷⁶ ReLOaD stands for the Regional Programme on Local Democracy in the Western Balkans. Its Local Democracy (LOD) methodology establishes transparent, competitive and accountable procedures for allocating local government funding to civil society organisations. The programme is funded by the European Union and implemented by UNDP. More information available at: https://www.undp.org/albania/projects/regional-programme-local-democracy-western-balkans-reload?utm_source

⁷⁷ Municipalities including Tirana, Shkodra, Lushnja, Saranda, Kavaja, Kukës, Patos and Kamza have formally adopted the LOD methodology.

⁷⁸ Official Gazette 97/2010, Law No. 10296, dated 8 July 2010, "On Financial Management and Control," as amended. Available at: <http://qbz.gov.al/eli/ligj/2010/07/08/10296>

⁷⁹ Official Gazette 186/2015, Law No. 112/2015, dated 15 October 2015, "On Public Financial Inspection". Available at: <http://qbz.gov.al/eli/ligj/2015/10/15/112>

organisations are contractually required to use the funds for their approved purpose and in accordance with the agreed project and budget. Depending on the nature of non-compliance and the applicable contractual provisions, measures may include suspension or termination of funding and recovery of funds. Where irregularities also constitute offences under applicable legislation, the relevant legal provisions apply.

Evidence gathered through focus groups with NPOs that had received ASCS funding in 2025 stress that monitoring requirements are implemented in practice. These NPOs reported regular follow-up by the ASCS, and written feedback concerning project implementation and generally assessed the monitoring process positively. The ASCS Annual Report also provides aggregate information on monitoring activities carried out during 2025, although it does not provide sufficiently detailed information to establish systematically the proportion of projects under each funding call that underwent on-site monitoring.

A distinction should, however, be made between the monitoring of individual grants and the evaluation of the overall effectiveness and impact of public funding programmes. Across the institutions that provides financial support, monitoring mechanisms are generally focused on whether funded activities are implemented in accordance with the approved proposal, budget and contractual requirements. In the case of the ASCS, the applicable regulatory framework provides for financial reporting and control of projects financed by the Agency, while the ASCS Annual Report documents the monitoring of grant implementation and reports on the distribution of grants by priority area and geographical coverage. Findings from focus-group discussions with NPO beneficiaries also indicate that monitoring takes place in practice, including follow-up by the Agency and feedback on project implementation. Nevertheless, the available documentation reviewed for this assessment does not demonstrate a corresponding practice of periodic programme-level evaluation of the ASCS grant scheme. In particular, no publicly accessible evaluation was identified that aggregates the results of funded projects to assess the overall effectiveness, longer-term outcomes or sustainability of the Agency's financial support and to demonstrate how such findings inform subsequent funding priorities and grant-making decisions.

The same applies to funds administrated by the NYA. The Agency operates within the framework of the National Youth Strategy 2022–2029, for which a structured monitoring system exists. However, strategy monitoring should not be equated with an evaluation of the NYA grant programme itself. The desk review did not identify a publicly available periodic evaluation assessing, at programme level, the extent to which funding provided to youth organisations has achieved the intended outcomes, the sustainability of the results produced, or how evidence from completed projects has been used to inform the design and allocation of subsequent calls.

For the Ministry of Justice, monitoring and reporting are embedded in the broader system of state-guaranteed legal aid. The Ministry's monitoring documentation reports on the work of the Free Legal Aid Directorate and includes information concerning the four NPOs financed from the state budget to provide primary legal aid in 2025.⁸⁰ Nevertheless, the available reporting primarily concerns implementation of the legal-aid system, institutional measures and service provision. The assessment did not identify a separate publicly available evaluation examining specifically the effectiveness or impact of the financing provided to NPOs as a funding mechanism, including its contribution to access to primary legal aid or the sustainability and added value of services provided through NPOs.

⁸⁰ Ministry of Justice, 2026, "Monitoring Report 2025". Available at: https://www.drejtesia.gov.al/wp-content/uploads/2026/07/Raporti-i-Monitorimit-per-vitin-2025.pdf?utm_source=

For grant schemes administered by the ministry responsible for culture, tourism and sport, the information reviewed similarly provides evidence of the allocation of financial support and the projects and organisations supported, but no publicly accessible periodic programme-level evaluation of the funding provided to NPOs was identified. Consequently, while information on individual funding decisions and implementation may be available, there is limited publicly available evidence demonstrating how the cumulative results of funded projects are assessed and used to evaluate or improve the overall funding scheme.

At the local level, municipalities generally report monitoring of NPO-funded projects, particularly with regard to project implementation, compliance with contractual requirements and the use of allocated funds. More structured monitoring and evaluation arrangements have been applied in municipalities participating in the ReLOaD programme, which introduced the LOD methodology and dedicated procedures for the management and monitoring of NPOs grants. However, these evaluations relate to the EU/UNDP-supported ReLOaD programme rather than demonstrating an institutionalised practice by Albanian municipalities of periodically evaluating the overall effectiveness and impact of public funding provided to NPOs from their own budgets. Based on the monitoring work for this assessment, monitoring at municipal level remains predominantly focused on individual project implementation, while systematic municipal-level evaluations of the cumulative results and longer-term effects of NPO funding were not identified.

2.2.4. Non-Financial Support

The framework for non-financial public support to NPOs is fragmented, with different forms of support deriving from sector-specific legislation and institutional practices rather than from a single, comprehensive framework. In the cultural sector, Law No. 10352/2010 “On Art and Culture” establishes the broader framework governing public policies and institutional activity in the field of arts and culture.⁸¹ A more specific mechanism of non-financial support is provided through the legislation governing seized and confiscated assets. Law No. 34/2019 “On the Administration of Seized and Confiscated Assets”, as amended, together with its implementing regulations, provides for decisions on the destination and use of confiscated assets, including their use for social and public-interest purposes.⁸²

The extent to which non-financial support is governed by clearly prescribed and criteria-based procedures varies according to the institution and type of support concerned. The framework governing confiscated assets is comparatively more structured: Council of Ministers Decision No. 888/2020 establishes criteria and procedures for determining the use and transfer of confiscated assets.⁸³ Nevertheless, no set of harmonised rules applies across public institutions to other forms of non-financial assistance provided to NPOs. Consequently, access conditions, decision-making procedures and the information made publicly available vary considerably depending on the institution and type of support.

⁸¹ Official Gazette 166/2010, Law No. 10352, dated 18.11.2010, “On Art and Culture”, as amended. Available at:

<http://qbz.gov.al/eli/ligi/2010/11/18/10352>

⁸² Official Gazette 99/2019, Law. No. 34/2019 “On the Administration of Seized and Confiscated Assets”, as amended. Available at:

<http://qbz.gov.al/eli/ligi/2019/06/17/34>

⁸³ Official Gazette 201/2020. Decision of Council of Ministers No 888, dated 11.11.2020 “On determining the evaluation criteria, methods and procedures for granting for use and alienation of confiscated assets”. Available at: <http://qbz.gov.al/eli/vendim/2020/11/11/888>

The social reuse of confiscated assets represents one of the clearest examples of non-financial support in practice. In 2025 AAPSK launched a public call for proposal on social reuse of confiscated assets.⁸⁴ The call was open to different entities, including NPOs. In total around 30 applications were received, out of which 3 were awarded.⁸⁵ According to the response received by AAPSK two of the selected winners were NPOs, which were granted the use of confiscated properties for social purposes. The properties were intended to be transformed respectively into a cultural and community space and a centre providing reintegration services to vulnerable groups.

At the central level, the information collected for this monitoring indicates that non-financial support is provided by several public institutions, although its form and scope vary according to their respective mandates. According to information provided by ASCS, in 2025 the Agency supported NPOs through information, guidance and technical assistance during project implementation. The Ministry responsible for culture also reported providing non-financial support to NPOs during the reporting period, alongside its financial support.

At the local level, non-financial assistance is more widespread than financial support. Responses received from municipalities indicate that support takes different forms, including the provision or temporary use of premises and equipment, logistical and technical assistance, staff support and institutional cooperation in organising meetings, training sessions and community activities.⁸⁶

From the perspective of NPOs interviews for this assessment, access to municipal non-financial support was generally perceived as relatively straightforward. Organisations participating in interviews did not report significant administrative obstacles when requesting support such as meeting or training space, logistical assistance or institutional coordination.

2.3. Human capital

2.3.1. Employment in NPOs

The legal framework does not establish a separate employment regime for NPOs. Their employment relationships are governed by the Labour Code,⁸⁷ under the same general rules applicable to other employers.

⁸⁴ The information is retrieved from the official Facebook page of the Agency for Administration of Sized and Confiscated Assets” Available at: <https://www.facebook.com/aapskalbania/posts/-thirrie-publike-p%C3%ABr-projekt-ide-p%C3%ABr-rip%C3%ABrdorimin-social-t%C3%AB-pasurive-t%C3%AB-konfisku/1158330406320491/>

⁸⁵ Agency for Administration of Sized and Confiscated Assets, 2026 “Annual Report 2025”, pp. 29. Available at: <https://aapsk.gov.al/wp-content/uploads/2026/02/Raporti-2025-Final.pdf>. According to the response received by the Agency 22 out of 30 of the total applications were submitted by NPOs.

⁸⁶ Municipalities across Albania report varying levels of non-financial support to NPOs. Çërrik provided non-financial support to 15 organisations through premises and institutional cooperation within the Multifunctional Community Centre, co-funded by the EU through UNICEF and World Vision. Kamza secured non-financial support for 6 NPOs, including use of the Palace of Culture and the Youth Hall, alongside technical assistance and coordination. Roskovec made premises available free of charge, plus logistical support to the Local Action Group, combining financial and non-financial backing. Përmet provided premises, equipment, and support staff according to organisational needs, without additional financial contracts. Lezha cooperated with NPOs by making premises available for meetings and trainings under cooperation agreements. In Pustec, 2 NPOs benefited from municipal premises, equipment, and staff, without any formally documented procedure. Mallakastër made public premises available and coordinated community activities, without formal contracts or procedures. Pukë provided infrastructure and logistical support, including halls and personnel, to 5 organisations, without formal agreements. Lushnjë supported 8 organisations with premises and training, without formalised mechanisms. Dropull and Belsh reported only basic logistical support.

⁸⁷ Law No. 7961, dated 12.07.1995, “Labour Code of the Republic of Albania”, as amended. Available at: https://qbz.gov.al/preview/c1c18a6c-5f3e-457d-b931-de505b3c7ed0?utm_source

The framework for employment-promotion measures also provides opportunities for NPO participation. In particular, the programme on community public works expressly includes NPOs and civil society organisations among eligible employers, subject to compliance with the applicable eligibility and administrative requirements.⁸⁸

Establishing the actual scale of employment in the NPO sector remains more difficult. A comprehensive and up-to-date figure for the number of persons employed by NPOs in 2025 could not be established. The General Directorate of Taxation indicated that employment data are available on its website. However, no publicly available information specifically on employment in the NPO sector could be identified on the website.⁸⁹ Consequently, the available statistical information does not provide a sufficiently current and readily accessible picture of the size and structure of NPO employment in 2025. This also limits the possibility of assessing changes in sector employment over time.

Information provided by the National Agency for Employment and Skills (NAES/AKPA) nevertheless provides some evidence regarding NPO access to public employment-support schemes. According to the response received by the Agency, 135 entities participated in the relevant employment-support schemes in 2025. Of these, 43 NPOs applied for participation and 35 were approved, corresponding to approximately 81% of the NPO applicants. The remaining applications were rejected due to incomplete documentation, in accordance with the applicable requirements. Interviews conducted with NPOs that had applied for or benefited from these programmes did not indicate differential treatment compared with other participating employers.

Employment in the NPO sector was also affected by changes in the funding environment in 2025. The temporary suspension of U.S. foreign assistance, combined with shifting priorities among other donors, increased financial pressure on NPOs. According to interviews with NPO representatives, particularly social service providers, some organisations reduced staff or shortened employment contracts in response to funding constraints.

2.3.2. Volunteering in NPOs

In December 2025, Parliament adopted Law No. 94/2025 “On Volunteering”, replacing the previous Law No. 45/2016.⁹⁰ The law aims to establish an enabling framework for volunteering and regulates both long- and short-term engagement, including the rights and obligations of volunteers and volunteering providers, contractual arrangements, basic protections and reimbursement of necessary expenses. It also introduces a legal basis for state support, allowing eligible volunteering providers to receive subsidies for volunteer-related, supervision and programme-management costs. The detailed procedures and criteria for such support are to be established through secondary legislation.

During 2025, however, no operational state-supported volunteering programme or incentive scheme was identified, and NPOs consulted for this assessment did not report benefiting from such support. This is

⁸⁸ Official Gazette No. 130/2020, DCM No. 535, dated 8 July 2020, “On the procedures, criteria and rules for the implementation of the Community Public Works Programme”, as amended, p. 7710, Chapter III, para. 4. Available at: <http://qbz.gov.al/eli/vendim/2020/07/08/535>

⁸⁹ The information was obtained through a request for information submitted by Partners Albania

⁹⁰ Official Gazette 15/2026. Law No 94/2025 “For volunteering”. Available at: <http://qbz.gov.al/eli/ligj/2025/12/18/94>

consistent with the timing of the reform, as the new law had not yet entered into force during the reporting period.

At the same time, NPOs raised concerns during the legislative process regarding certain elements of the new framework. In particular, they emphasised the need for a clearer distinction between genuine volunteering and employment, in order to avoid the application of employment-related tax and social insurance obligations that are not appropriate to the nature of volunteering. Concerns were also raised regarding the administrative requirements associated with volunteer registration and the potential burden created by the sanction's regime. NPOs submitted consolidated recommendations supported by legal expertise during the consultation process, although not all of these recommendations were reflected in the adopted law.⁹¹

In practice, volunteering continued to take place during 2025 independently of state-supported programmes, including through both organised and more informal forms of engagement. Interviews conducted with NPOs did not identify cases in which public authorities prevented organisations from engaging volunteers or imposed prior authorisation requirements or sanctions for volunteer engagement. However, this relatively open environment was not accompanied by dedicated public programmes, incentives or other support mechanisms to actively promote volunteering or assist organisations engaging volunteers.

2.3.3. Civic Engagement

Civic engagement is promoted within the pre-university education system through both the legal framework and education policies aimed at fostering democratic values, active citizenship, participation and social responsibility among students. Law No. 69/2012 "On the Pre University Education System in the Republic of Albania," as amended⁹² provides the main legal for pre-university education system. Civic education is incorporated into the official curriculum, with the relevant curricula addressing democratic culture, human rights, participation and civic competences. The education system also provides for student representative structures, including student governments, enabling students to participate in school life and decision-making processes.

According to the response received from the Ministry of Education, the regulatory framework also allows supplementary and extracurricular activities in social, cultural, environmental, and community related areas, with student's participation on a voluntary and inclusive basis. Schools implement programmes outside regular teaching activities, including "School as a Community Centre", "Let's Do Homework", "Art, Crafts and Sport" and "Sports Teams in Schools", as well as activities related to the prevention of violence and bullying. The framework allows cooperation between schools and non-public organisations, although, according to the Ministry's response, activities involving external organisations are subject to the applicable approval procedures.

In practice, cooperation between educational institutions and NPOs provides additional opportunities for students to participate in civic, social and community-oriented activities. Evidence from interviews and cases reviewed indicates that such cooperation takes place but remains predominantly project based. NPOs also

⁹¹ Partners Albania for Change and Development, 2026, Comments and Recommendations on the Draft Law "On Volunteering". Available at: https://resourcecentre.al/sq/komente-dhe-rekomandime-mbi-projektligjin-per-vullnetarizmin/?utm_source

⁹² Official Gazette 87/2012. Law No. 69, dated 21.6.2012, "On the Pre-University Education System in the Republic of Albania," as amended. Available at: <http://qbz.gov.al/eli/ligj/2012/06/21/69>

reported that procedures for obtaining approval to conduct activities in schools can be time-consuming, limiting the accessibility and regularity of such cooperation.

Area 3: State-NPO Relationship

3.1. Framework and practices for cooperation

3.1.1. Strategies for Cooperation

With regard to civil society, there is currently no dedicated government strategic document governing the development of and cooperation with civil society, despite repeated policy commitments and its inclusion as a measure in the Roadmap for the Functioning of Democratic Institutions.⁹³ The implementation period of the second Roadmap for Government Policy towards a More Enabling Environment for Civil Society Development 2019 to 2023 has expired with a low level of achievement, reflecting limited institutional prioritisation and follow through. Although the preparation of a third Roadmap was formally envisaged, more than two years later no updated document has been adopted and no substantive progress has been publicly documented, leaving civil society development without a coherent and up to date strategic framework.

The only policy document containing measures to create an enabling environment for civil society organisations is the Roadmap for the Functioning of Democratic Institutions, adopted in 2023 under Cluster 1 of the EU accession framework.

In practice, there are some examples demonstrating cooperation between state institutions and NPOs, particularly in the context of consultations for strategic documents, participation in the PPIE, and occasional joint activities or meetings. Information provided by ministries themselves on discussion and consultation processes reflects an uneven and inconsistent approach to consultation across institutions. While some institutions reported holding several meetings, these appear to have served primarily as information sharing exchanges rather than as structured consultation processes with clear outputs and follow up. In many cases, the documentation made available was partial and did not provide a full picture of the process, as supporting materials such as minutes, draft negotiating positions, or other follow up documents were not consistently shared. Overall, the incomplete nature of the information provided points to continuing shortcomings in transparency, documentation, and reporting.

Evidence from interviews suggests that such cooperation is not yet systematically embedded in policymaking processes. NPO engagement is often limited to consultation phases rather than early-stage policy design, and in some cases is perceived as formalistic, with limited influence on final decisions. Instances of short consultation timelines, selective participation, and partial reflection of comments point to elements of pro forma cooperation. While progress can be noted in the establishment of structures and processes for engagement, their consistent and meaningful use remains limited.

No official monitoring or progress report on the implementation of the Roadmap for Functioning of Democratic Institutions has been publicly published. Through a Freedom of Information request, the Ministry of Justice, as the authority responsible for coordinating and monitoring its implementation, reported that 10 of 14 strategic measures have been achieved during the monitoring period. The response did not, however, specify which

⁹³ Official Gazette 168/2024, Council of Ministers Decision No. 611, dated 2 October 2024, "On the Approval of the Roadmap for the Functioning of Democratic Institutions". Available at: <http://qbz.gov.al/eli/vendim/2024/10/02/611>

measures were completed, nor did it provide evidence or documentation to substantiate the reported number. Independent monitoring from Partners Albania indicates that only two of the measures are implemented, a significant discrepancy between official reporting and observed progress.

There is currently no evidence that policymakers systematically rely on comprehensive statistical data when designing civil society development policies, nor is there sufficient gender disaggregated data to assess inequalities in governance, employment, income, access to funding, or participation in decision making. This lack of accessible and structured data continues to limit evidence based policymaking and strategic planning for the development of the civil society sector.

3.1.2. Mechanisms for Cooperation

The main institutional mechanism for cooperation between the government and NPO sector is the National Council for Civil Society (NCCS), established under Law No. 119/2015⁹⁴ as a collegial advisory body aimed at facilitating institutional cooperation with NPOs, strengthening good governance, and enhancing transparency in public decision making. Operational since 2016, the NCCS serves as the main consultative platform for dialogue between public institutions and civil society. Under the law, the Council comprises 27 members: 13 representatives of NPOs, 13 representatives of public institutions, and 1 representative of the National Economic Council. This composition provides for equal numerical representation of civil society and public institutions and establishes a formal framework for NPO participation in the Council's work.

Another important cooperation mechanism is the National Council for European Integration (NCEI), established under Law No. 15/2015 "On the role of the Assembly in the European integration process", as amended.⁹⁵ As the highest national advisory structure on European integration, the NCEI brings together political actors, public institutions, civil society organisations, and other stakeholders to discuss EU-related reforms and policies. Its multi-stakeholder composition formally provides for civil society representation alongside institutional and political actors.

According to the NCEI Annual Report for 2025, civil society representatives participated in the Council's activities during the reporting period, contributing their views and expertise to discussions on matters related to European integration.⁹⁶ This provides NPOs with an institutional channel to contribute to policy dialogue and formulate recommendations within the Council's advisory mandate.

In practice, the NCCS continues to function as the main formal mechanism for dialogue between the state and civil society on matters related to the development of civil society. However, its capacity to facilitate sustained dialogue and effectively articulate and advance NPOs positions in public decision-making remains very limited.

⁹⁴ Law No. 119/2015, "On the Establishment and Functioning of the National Council for Civil Society," approved by the Albanian Parliament at the end of 2015. Available at: <https://amshc.gov.al/wp-content/uploads/2025/03/raporti-vietor-2024-final.pdf>. Official Council website: <https://kkshc.gov.al/en/home/>.

⁹⁵ Assembly of the Republic of Albania. (2015). Law No. 15/2015, "On the Role of the Assembly in the European Integration Process," as amended. Available at: <https://www.parlament.al/struktura/cb7c3a17-5b45-42db-9d58-a866b432345a>,

⁹⁶ National Council for European Integration. (2026). Annual report of the National Council for European Integration 2025. Available at: <https://kuvendiwebfiles.blob.core.windows.net/webfiles/202605110933090612Raporti%20Vjetor%20i%20KKIE%202025.pdf>

With regard to resources, the NCCS does not have a separate budget, as Law No. 119/2015 provides that expenditures related to its activities are covered by the budget of the ASCS, which also serves as the Council's Secretariat.⁹⁷ Accordingly, the ASCS is responsible for providing the financial resources necessary to support the functioning and activities of the NCCS within its own budget. According to information provided by the ASCS, these resources are used to support the organisation of NCCS meetings.

Available information also points to challenges concerning the consistency of government representation in the Council. Information from recent NCCS meetings confirms the participation of representatives from several ministries and central institutions but does not provide a complete picture of the membership envisaged under Law No. 119/2015. Moreover, a review of different meetings indicates variations in government representation, with institutional representatives not consistently remaining the same across meetings. This makes it difficult to assess the continuity of representation and the extent to which stable institutional engagement is maintained over time.⁹⁸

The level of activity of the NCCS was particularly limited during the reporting period. Although Law No. 119/2015 requires the Council to convene at least three times per year, only one meeting was held in 2025, reportedly due to the parliamentary elections and the subsequent formation of the new government.⁹⁹ The limited frequency of meetings, together with weak follow-up and insufficient continuity between meetings, constrained the Council's ability to maintain regular dialogue and to articulate and consolidate NPOs positions. Available evidence also provides limited indication that issues and recommendations raised through the Council were subsequently followed up in relevant policy processes.¹⁰⁰

Another mechanism for cooperation with NPOs is the National Council for European Integration (NCEI). According to its Annual Report for 2025, the NCEI maintained a relatively regular level of activity during the reporting period and continued to provide a structured platform for dialogue on key aspects of Albania's EU integration process.¹⁰¹ At the same time, the extent to which contributions and recommendations made through the NCEI inform policy processes is not clearly documented.

3.2. Involvement in policy and decision-making process

3.2.1. Standards for NPO Involvement

Albania has established a legal framework that sets out clearly defined standards for the involvement of NPOs in policy and decision making processes, primarily through Law No. 146/2014 "On Notification and Public Consultation".¹⁰² The law prescribes minimum procedural requirements that public authorities must follow, including the obligation to publish draft acts, ensure transparent notification, and provide a minimum consultation period of 20 calendar days for stakeholders, including NPOs, to submit comments. It also requires institutions to review and consider all feedback received and to provide a reasoned response explaining the

⁹⁷ Official Gazette No. 200/2015. Law No. 119/2015, "On the Establishment and Functioning of the National Council for Civil Society," pp. 13170–13174. Available online at: https://qbz.gov.al/alfresco/webdav/FZ/2015/200/fz-2015-200.pdf?utm_source

⁹⁸ For more information on the members of the NCCS please visit the official webpage of the Council. Available online at: <https://kkshe.gov.al/>

⁹⁹ The information was obtained through a request for information submitted by Partners Albania

¹⁰⁰ More information available online at: <https://kkshe.gov.al/mbledhjet-e-keshillit-procesverbale/>

¹⁰¹ National Council for European Integration. (2026). Annual report of the National Council for European Integration 2025. Available at: <https://kuvendiwebfiles.blob.core.windows.net/webfiles/202605110933090612Raporti%20Vjetor%20i%20KKIE%202025.pdf>

¹⁰² Law No. 146/2014, dated 30 October 2014, "On Notification and Public Consultation" Available online at: <https://idp.al/njqp/>

acceptance or rejection of comments. These provisions reflect key principles of good regulatory practice, including transparency, participation, and accountability. However, while the legal framework establishes these minimum standards, their implementation in practice remains uneven, particularly with regard to the quality of consultations, adherence to timelines, and the extent to which NPO input is meaningfully reflected in final decisions.

In addition to the general framework for public consultation, the Partnership Platform for European Integration (PPIE) provides a sector-specific mechanism for structured dialogue and stakeholder participation in Albania's EU accession process. Through its discussion and consultation tables, NPOs and other stakeholders can contribute with expertise, and recommendations on issues related to the respective areas of the EU acquis, including EU-related strategic and planning documents and other matters linked to the accession process.¹⁰³

In practice, based to government reporting, 117 meetings of the discussion and consultation tables were held during the 2015, representing an increase of 58.11% compared with 2024. Around 1,131 representatives of stakeholder groups participated in these meetings, including 242 representatives of NPOs, alongside representatives of academia, business, local government, media, employees' associations and independent experts.¹⁰⁴ Information obtained directly from public institutions, together with documentation published on their official websites, confirms the operation of PPIE mechanisms across a number of negotiating areas. Meetings were supported, to varying degrees, by agendas, participant lists, minutes or operational conclusions, and some institutional responses reported that recommendations generated through these consultations contributed to the development or improvement of policies and strategic documents and informed the EU negotiating process.¹⁰⁵ However, practices regarding the documentation, follow-up, and consideration of recommendations appear to vary across PPIE tables, with insufficient evidence to assess their consistent application across the mechanism.

Also, NPOs have also been engaged in following the implementation and monitoring of Albania's Reform Agenda under the EU Growth Plan for the Western Balkans. The framework of the Reform and Growth Facility envisages stakeholder participation in monitoring, including, where relevant, representatives of civil society and the private sector.¹⁰⁶ In Albania, civil society engagement has included independent monitoring of reform commitments, the development of tools to track progress, and multi-stakeholder dialogue on implementation challenges and priorities.¹⁰⁷ These initiatives provide additional opportunities for NPOs to contribute evidence, expertise, and recommendations and to strengthen public scrutiny of progress in implementing the Reform

¹⁰³ Council of Ministers of the Republic of Albania. (2019). Prime Minister's Order No. 113, dated 30 August 2019, "On the Forms of Participation, Functioning and Institutional Structure of the Partnership Platform for European Integration." Available online at: <https://www.kryeministria.al/platforma-e-partneritetit-per-integrimin-evropian/>

¹⁰⁴ Council of Ministers of the Republic of Albania. (2026). Report on the European Union accession and negotiation process for 2025, Section 4.2, Partnership Platform for European Integration. Available online at: <https://www.parlament.al/dokumentacioni/aktet/648cb74b-9b57-426b-ae50-9937f443dc12>

¹⁰⁵ Information obtained through requests for information submitted by Partners Albania to the responsible public institutions, complemented by publicly available documentation on the activities of the Partnership Platform for European Integration during 2025. In its response, the Ministry of Interior reported that stakeholders actively participated in discussions under Chapter 24, that meetings were documented through agendas, participant lists and minutes, and that discussions and recommendations contributed to policy and strategic documents and informed the negotiating process.

¹⁰⁶ European Commission. (2024). Annex to the Commission Implementing Decision approving the Reform Agendas and the multiannual work programme under the Reform and Growth Facility for the Western Balkans. Available at: https://enlargement.ec.europa.eu/document/download/5b511ed0-b2ba-41c3-905c-74b95ae52c37_en

¹⁰⁷ Cooperation and Development Institute. (2025). *Reform Tracker: Albania*. Available at: <https://cdinstitute.eu/scoreboard-albania/>; Institute for Democracy and Mediation. "Reform Agenda in Albania – Mobilizing Civil Society". Available at: <https://idmalbania.org/news-cpt/reform-agenda-in-albania-mobilizing-civil-society/>

Agenda. However, civil society remains limited, with its contribution taking place primarily through independent monitoring and dialogue initiatives.

The Albanian School of Public Administration (ASPA)¹⁰⁸ provides training modules for civil servants covering public consultation, the right to information, participatory budgeting, and gender budgeting. These trainings aim to strengthen institutional capacity in transparency, inclusive decision making, and the integration of gender perspectives into public financial planning and service delivery. However, there is no tailored programme or training specifically on NPO involvement. A related gap concerns internal regulations more broadly: while general provisions for public consultation exist, there is no coherent or mandatory system requiring government institutions, line ministries, or public agencies to appoint dedicated units or officers responsible for coordinating, monitoring, and reporting on NPO involvement specifically.

In depth interview with NPOs indicate that, among those involved in consultation processes, not all consider the documentation provided sufficient for meaningful input. In several cases, draft documents are either incomplete, lack supporting materials such as explanatory notes or impact assessments, or are published at a stage that limits substantive engagement. Furthermore, there are instances where institutions do not make draft documents publicly available prior to or during the consultation process, restricting transparency and undermining the ability of NPOs to provide informed and timely feedback. These gaps point to inconsistencies in ensuring access to comprehensive and timely information as a prerequisite for effective participation.

Summary reports following public consultations are not consistently made publicly available, and where such reports exist, their quality and completeness vary across institutions. In many cases, consultation outcomes are published without sufficient detail on the input received or how comments were addressed. The inclusion of a list of participating NPOs is not systematic, and feedback reports rarely provide clear explanations of whether recommendations were accepted or rejected, or the reasons certain proposals were not incorporated. Findings from interviews further suggest that a number of suggestions and comments were not considered at all during consultation processes, pointing to shortcomings in transparency, accountability, and the substantive use of stakeholder input. At the local level, nearly all responding municipalities held consultations, but NPO participation was generally low or unverified.¹⁰⁹

3.2.2. Access to Draft Regulations

The legal framework for public consultation is based on Law No. 146/2014 "On Notification and Public Consultation,"¹¹⁰ which requires public institutions to publish draft laws and policies through the Electronic Register for Public Consultations. Access to information is regulated by Law No. 119/2014 "On the Right to

¹⁰⁸ The information is retrieved by the official webpage of the Albanian School of Public administration. Available at: www.aspa.gov.al

¹⁰⁹ At local level, almost all municipalities that provided responses reported holding consultations, but NPO participation remained low or unverified in most cases. Lushnje stands out as the best practice model, with 28 consultations, 4 NPOs involved, and 92% of draft legislation consulted. Durres held 27 hearings (NPO numbers unspecified), while Rroskovec (14 consultations, 50% with civil society), Bulqiza (14, roughly 10%), Maliq (13, 4 NPOs), Mirdita (10, 3 NPOs), and Diber (10, 10%) also showed activity, though Mallakaster's 12 consultations included no NPOs. Several municipalities, including Tepelena, Prrenjas, Polican, Shijak, Skrapar, and Kucove, held consultations without any NPO participation. Libohova, Finiq, Konispol, Patos, and Pogradec reported no consultations at all, reflecting very low transparency. Notification practices also varied: Pustec used only its website, and Kukes used social media and local outlets, with limited direct outreach to NPOs likely explaining the low participation overall.

¹¹⁰ Law No. 146/2014 "On Notification and Public Consultation". Available at: <https://financa.gov.al/wp-content/uploads/2024/09/ligi-1462014.pdf>

Information," which sets clear procedures, deadlines, and exceptions.¹¹¹ However, implementation remains uneven, responses are not always timely, and information is frequently shared in non-editable or scanned formats, limiting usability. To strengthen proactive transparency, the Office of the Commissioner for the Right to Information and Protection of Personal Data adopted Order No. 280/2025¹¹² and Order No. 281/2025,¹¹³ the latter introducing a dedicated section on Municipal Council activity and extending the model to Regional Councils. All public authorities must implement these models by 31 March 2026. The law also provides for sanctions in cases of non-compliance, though these are applied only in a limited number of cases, weakening the framework's deterrent effect.

In practice, according to the Parliament's report, between January and July 2025, parliamentary committees assessed 159 amendments, eight of which were proposed by NPOs. However, none of these eight amendments are recorded among those adopted.¹¹⁴ Parliament also continued to use its online consultation platform, through which 39 documents were consulted, including 16 draft laws, 20 reports of constitutional or statutory institutions, two administrative documents and one draft strategy. According to the report, the consultation platform was further improved following suggestions from civil society, including functionalities allowing users to track the acceptance or rejection of submitted comments and receive notifications on consultation deadlines. However, the available data provide limited information on the extent to which NPOs contributions are substantively reflected in final legislative and policy outcomes.

At the government level, the electronic register for notification and public consultation (<https://konsultimipublik.gov.al/>) serves as the main platform for publishing draft project and strategies and inviting public for input.¹¹⁵ In 2025, data retrieved from the platform show that 74 consultation processes were published by 11 ministries.

While the legal and institutional framework for public consultation is in place, challenges remain regarding the quality and meaningfulness of consultation processes. The European Commission's Albania Report 2025 identifies lack of meaningful public consultations as a continuing challenge and notes that further efforts are needed to strengthen the quality control of consultations, ensure proper follow-up, and encourage stakeholder participation, particularly those of NPOs.¹¹⁶

For this monitoring exercise, 41 out of 61 municipalities responded to the information requests submitted, corresponding to a response rate of nearly 67%. At the central level, the response rate was lower, only 8 out of 17 ministries provided a reply, representing approximately 47% of all ministries. This gap suggests that local self-government units were, on the whole, more responsive to information requests than central institutions during this monitoring period. However, response rate alone does not capture the full picture: as discussed

¹¹¹ Law No. 119/2014 "On the Right to Information," as amended. Available at: https://idp.al/wp-content/uploads/2024/02/Ligi-nr.119-date-18.9.2014_ndryshuar.pdf

¹¹² Order No. 280, dated 20.12.2025, "On the approval of the model transparency programme for public authorities,". Available at: https://idp.al/wp-content/uploads/2026/01/Urdher-nr.-280-miratimi-Programi-model-i-transparences-per-autoritetet-publike.pdf?utm_source

¹¹³ Order No. 281/2025 approved the new model of the Transparency Programme for the Local Government Self Units: Available at: <https://idp.al/wp-content/uploads/2026/01/Urdher-nr.-281-miratimi-Programi-model-i-transparences-per-Njesite-e-Veteqeverisjes-Vendore.pdf>

¹¹⁴ Assembly of the Republic of Albania. (2025). Report of the Parliamentary Committee Service, January–July 2025. Available at: <https://kuvendiwebfiles.blob.core.windows.net/webfiles/202508070818500822Raport%20She%CC%88rbimi%20i%20Komisioneve%20Parlamente%2>

¹¹⁵ The information is retrieved from the official webpage of the government consultation platform. Available at: <https://konsultimipublik.gov.al/>

¹¹⁶ European Commission. 2025. Albania Report 2025. Available at: https://enlargement.ec.europa.eu/albania-report-2025_en?utm_source

below, a number of the responses received, at both the municipal and ministerial level, either did not address the request submitted or addressed it only partially, meaning the effective rate of substantive, complete responses is lower than the raw reply rate suggests.

Table 2: Complaints handled by the Commissioner for the Right to Information and Protection of Personal Data

Complainant/category	Central institutions	Local self-government units	Other authorities	Total
All new complaints received in 2025	385	293	183	861
Complaints submitted by NPOs	0	26	61	87
Cases carried over from 2024	—	—	—	36
Total caseload handled in 2025	—	—	—	897

According to the Commissioner's official responses, 87 complaints submitted by NPOs were identified in 2025. Public institutions provided the requested information in 69 cases following the Commissioner's intervention. Three formal decisions were issued: two ordering disclosure and one rejecting a complaint. Of the remaining complaints, three were outside the scope of the law, two were refused on the basis of statutory limitations, four were submitted after the deadline, one was incomplete, and five were carried over for examination in 2026. These findings indicate that the Commissioner's intervention frequently facilitated access to information without a formal decision, but the responses do not specify whether sanctions were imposed in cases initiated by NPOs.

3.2.3. Cross Sector Bodies

The legal and institutional framework provides for the involvement of civil society organisations in policy and decision-making processes through structured mechanisms, such as the discussion and consultation tables established under the Partnership Platform for European Integration (PPIE), as well as other sectoral working groups coordinated by line ministries. The PPIE was established by Order of the Prime Minister No. 113, dated 30.08.2019,¹¹⁷ and consists of two levels: the PPIE Board and 33 discussion and consultation tables, one for each chapter of the EU acquis under negotiation, each led by the negotiator responsible for that chapter.¹⁰ These inter-institutional working groups are established for all 33 chapters of the EU acquis and are composed of representatives from the state institutions responsible for each respective chapter.¹¹⁸ This mechanism is intended to facilitate dialogue between public institutions and stakeholders, particularly in the context of EU accession.

The framework establishes an application procedure for membership in the PPIE discussion and consultation tables. Applicants must submit a letter of interest and a CV demonstrating sufficient expertise or interest to contribute to the relevant table. Applications are assessed by the inter-institutional working groups when tables

¹¹⁷ Order of the Prime Minister No. 113, dated 30.08.2019, "On the forms of participation, functioning and institutional structure of the European Integration Partnership Platform." Ministry for Europe and Foreign Affairs, "Albania's EU Membership Process," Available at: https://amf.gov.al/pdf/publikime/Urdher-Nr.-113-date-30.08.2019-Per-format-e-plesemarrjes-funksionimin-dhe-strukturen-institucionale-te-platfomes-se-partneritetit-per-integrimin-Evropian.pdf?utm_source

¹¹⁸ Ministry for Europe and Foreign Affairs, "Inter-Institutional Working Groups," Available at: <https://integrimi-ne-be.puneteshatme.gov.al/en/strukturat/grupet-nderinstitucionale-te-punes/>

are established, and by their heads for subsequent membership requests. Any refusal must be justified. However, the order does not specify detailed assessment criteria, scoring or ranking procedures.⁺ Findings indicate that institutional practices vary, with some ministries issuing public calls and others relying on direct invitations based on previous cooperation or institutional preference. This variation raises concerns about transparency and equal opportunities for participation, as well as the consistent application of the prescribed membership procedure.

Expert interviews found no evidence that NPOs face state control, sanctions, inspections, or harassment as a result of expressing critical views in these advisory or working group settings. According to the experts consulted, NPO representatives were generally free to speak and share their positions without facing repercussions.

At the local level, municipalities follow a similar approach. NPO representatives are usually chosen based on past cooperation with the municipality, or because their expertise fits the topic being discussed, rather than through a formal, public selection process. This helps ensure that the organisations involved are relevant to the issue at hand, but it also means the process is often not transparent, not publicly announced, and not open to a wider range of organisations that might otherwise want to take part.

There is no indication that taking part in these advisory bodies limits an NPO's ability to advocate through other means. Organisations remain free to pursue public statements, media engagement, coalition-building, petitions, and other forms of advocacy alongside their participation in formal consultation mechanisms.

3.3. Collaboration in service provision

3.3.1. NPO Engagement in Service Provision and Contracting Procedures

Concerning service provision and competition for public contracts, Law No. 162/2020 “On Public Procurement”, as amended, introduced a specific chapter governing public contracts for social services and other special services.¹¹⁹ The Law places emphasis on quality considerations in the procurement of social services and allows participation in procedures for certain health, social and cultural services to be reserved for eligible organisations, as provided under Articles 102 and 103.

In this context, Law No. 92/2025 “On Alternative Family Care in the Republic of Albania”¹²⁰ further expands the scope for NPO involvement in the provision of social services by explicitly recognising their role in family-based alternative care. Under Article 26, licensed NPOs with experience in child protection and social service provision may, in cooperation with municipalities, support children and families involved in alternative care, provide training and counselling for foster families, and contribute to strengthening municipal capacities in this field. The Law also requires municipalities to promote cooperation with and the contribution of NPOs within the system of family-based alternative care. However, the detailed criteria and procedures for NPO involvement are to be determined by a decision of the Council of Ministers, meaning that the practical opportunities for NPOs

¹¹⁹ Official Gazette No. 30/2021. Law No. 162/2020, dated 23.12. 2020, “On Public Procurement”, as amended, Articles 100–103. Available at: <http://qbz.gov.al/eli/ligi/2020/12/23/162>

¹²⁰ Official Gazette No. 9/2026, Law No. 92/2025, dated 18.12. 2025, “On Alternative Family Care in the Republic of Albania”. Available at: https://www.sherbimisocial.gov.al/wp-content/uploads/2026/02/Ligji-92-2025.pdf?utm_source

to benefit from and participate in these arrangements will depend on the adoption and implementation of the relevant secondary legislation.

Legislation does not formally impose additional requirements on NPOs compared to other service providers. Where licensing or prior registration is required, NPOs are subject to the same procedures and criteria as other service providers, without additional or disproportionate requirements.

The legal framework also provides a formal basis for the procurement of social and other specific services through public procurement procedures. Council of Ministers Decision No. 768, dated 15.12.2021, as amended, defines the categories of social and other specific services, including those for which participation in public procurement procedures may be reserved for certain organisations, as well as the detailed rules governing such procurement. The Public Procurement Agency has clarified that contracting authorities must refer to the specific service codes set out in the annexes to this Decision when conducting such procedures. Procurement notices and awarded contracts are published through the electronic public procurement system and the public procurement bulletin, providing formal transparency of individual procedures.

NPO access to the provision of social services is also linked to sector-specific licensing requirements. NPOs providing activities for which licensing is required must obtain the relevant licence in accordance with the applicable legislation. However, publicly available consolidated information on the number of NPOs licensed to provide social services remains limited. Findings from the in-depth interviews conducted with NPOs indicate that, although licensing requirements and procedures are established in the legal framework, organisations may encounter administrative and procedural challenges in practice, particularly those with limited organisational capacity.

The Public Procurement Agency's response points to significant limitations in the transparency and monitoring of actual NPO participation. While procurement procedures and winning operators are published through open-data tools and the Public Procurement Bulletin, the Agency does not administer the full documentation of procedures conducted by individual contracting authorities, and therefore cannot provide consolidated data on reserved procedures, their budgets, or the participation of non-profit entities. This significantly limits the ability to assess, in a comprehensive way, whether NPOs are able to compete fairly and benefit from procurement opportunities in service provision.

In 2025, among the 41 responding municipalities, only three provided information on financial allocations to NPOs for social service, reflected in the Table 3. The reported funding varied considerably, with Shkodër providing the largest allocation. Support primarily targeted families and other vulnerable groups, survivors of domestic violence and older persons. These findings indicate that direct municipal financing of NPO-provided social services remains limited and uneven across the responding municipalities.

Table 3: Service provisions by local municipalities FY 2025

Municipality	NPO/service provider	Social service supported	Total amount allocated
Shkodër	"Shpresa" and Madonnina della Grappa	Social services for families and vulnerable groups	44,500,000 ALL (approx. EUR 464,000)

Vlorë	Vatra Centre	Shelter, security and related services for vulnerable groups	3,800,000 ALL (approx. EUR 39,600)
Lezhë	Emergency Centre and services for older persons	Support for victims of domestic violence and older persons	At least 600,000 ALL per year (approx. EUR 6,250)

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

The legal framework does not establish formal barriers preventing NPOs from receiving public funding for the provision of services through public procurement, grants, or other contracting mechanisms. In principle, NPOs are allowed to participate in the mechanisms through which the state delegates service provision to external providers. The framework also provides for the possibility of monitoring both financial expenditure and, to some extent, the quality of services delivered by providers, and allows for oversight of service provision through applicable rules and standards in the respective sectors.

However, the absence of legal barriers does not translate into effective access in practice. The framework offers only limited possibilities for funding NPO-delivered services and does not ensure sufficient, predictable, or multi-year financing; in practice, it does not appear to support long-term contractual arrangements or sustainable financing for NPO service providers on a systematic basis.

Interviews with organisations providing social services confirm that the situation on the ground remains highly challenging. Although the legal framework permits NPOs to receive public funding for service provision, state funding for social services is described as almost absent. As a result, organisations struggle to ensure the continuity and quality of services, and available funding is generally insufficient to cover the real costs of service delivery, including administrative and institutional overheads. This creates a strong dependence on foreign donors and project-based support, undermining the predictability and long-term sustainability of NPO-delivered social services.

This same funding gap also limits the state's ability to monitor and evaluate service quality in practice. Because state funding for social services is almost absent, there are very few cases in which public authorities carry out systematic performance monitoring or evaluation of service quality and impact under state-supported arrangements. Interviews with organisations suggest that, due to the lack of public funding and contractual engagement, monitoring and evaluation by state institutions has not developed into a regular, structured, or publicly documented practice.

Annex

Monitoring Matrix Framework and Methodology

The Monitoring Matrix on Enabling Environment for Civil Society Development is a detailed theoretical framework based on international human rights and freedoms and regulatory practices of European countries and the EU. The framework is built around three core areas: Basic Legal Guarantees of Freedoms; Framework for NPOs' Financial Viability and Sustainability; Government – CSO Relationship, each divided in sub-areas. The areas are elaborated by standards, which are further specified through legal and practice indicators. For each indicator there is a clear guidance on the data gathering strategy which should be utilized by country researchers, including publicly available data, FoI requests, survey, focus groups and interviews, as well as relevant secondary sources. The Monitoring Matrix is a comprehensive methodology, developed in 2013 and last revised in 2023, designed to assess the environment for NPOs in the Western Balkans and Turkey against international standards. The Matrix operates on an annual reporting cycle which ensures a e systematic and comparable evaluation across the region and across years, helping stakeholders track progress or regression, identify gaps and emerging trends, and prioritize reforms. The research undertaken aims to provide evidence on the enabling environment for civil society development and to influence the support of governments, the European Union and other donors towards more sustainable and strategic development of the sector. On national level, MM findings have been feeding national strategies for cooperation with and development of the sector and have directly supported the drafting of key laws. On European level, the MM findings have been consistently used in the EC Country reports of the Enlargement Package, and as of 2024 in the Rule of Law Report.

The MM Report is based on a comprehensive analysis of the legal, policy and strategic framework governing the enabling environment for NPOs in Albania in 2025, while also covering relevant developments in 2026. Laws, by-laws, strategies, action plans and reports were reviewed through desk research, complemented by evidence on their implementation in practice. Primary data were collected through three focus group discussions with: (i) informal and unregistered civil society groups; (ii) women's rights organisations; and (iii) NPOs with experience in accessing financial support and monitoring its accountability. In-depth interviews were also conducted with NPO representatives, public officials and banking-sector experts specialising in anti-money laundering requirements. Overall, 80 stakeholders contributed to the report through focus groups and interviews. In addition, Partners Albania conducted a survey of 76 NPOs focused exclusively on their experiences with registration and re-registration procedures. Further evidence was gathered through regular communication with NPOs receiving services from the National Resource Centre for Civil Society. This combination of methods enabled the report to compare the formal framework with the practical experiences of NPOs and other relevant stakeholders.

Additional quantitative data were collected through right-to-information requests. Partners Albania submitted 90 requests to relevant public authorities, including ministries, municipalities, independent institutions, and bodies responsible for NPOs. Responses were received from 62 authorities, representing a response rate of

approximately 68%. Under the Law on the Right to Information, public authorities are required to disclose information contained in existing official documents but are not obliged to compile or consolidate data from multiple sources in response to a request. Consequently, some authorities referred Partners Albania to information published on their websites instead of directly answering the questions. For example, the General Directorate of Taxation stated that the requested data were available on its website, although no relevant information could be found in the open-data section. Other institutions indicated that they could not retrieve information requiring the cross-referencing of multiple criteria. Most ministries provided only brief or partial responses, addressing a limited number of the questions submitted. This highlights shortcomings in data availability, institutional record-keeping and the capacity to provide comprehensive information on cooperation with and support for NPOs. The absence or delayed publication of official data remains a significant challenge across all areas of monitoring. Comprehensive, publicly accessible data are particularly lacking on the number of active NPOs and their employees, their financial contribution to the economy, the number of volunteers and hours contributed, and the types and volume of services provided. These gaps hinder accurate reporting, evidence-based policymaking and the development of effective advocacy strategies.

