



Office for Democratic Institutions and Human Rights

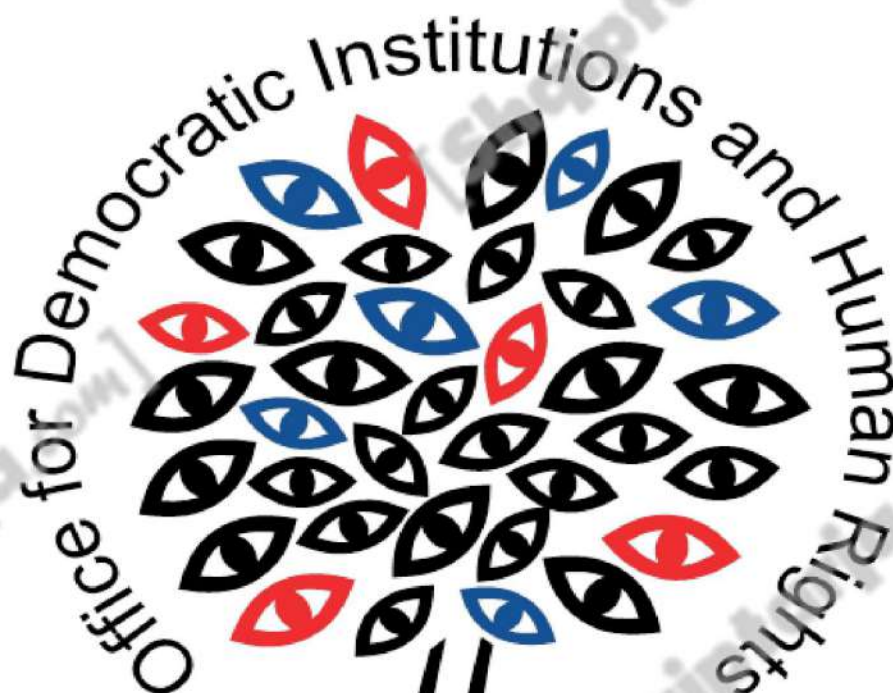
REPUBLIC OF ALBANIA

PARLIAMENTARY ELECTIONS

11 May 2025

ODIHR NEEDS ASSESSMENT MISSION REPORT

3-6 December 2024



ODIHR

Warsaw
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ODIHR Needs Assessment Mission Report

I. INTRODUCTION

In anticipation of an invitation to observe the 11 May 2025 parliamentary elections and in accordance with its mandate, the OSCE Office for Democratic Institutions and Human Rights (ODIHR) undertook a Needs Assessment Mission (NAM) to Albania from 3 to 6 December 2024. The NAM included Ulvi Akhundlu, Deputy Head of the ODIHR Election Department, and Kakha Inaishvili, ODIHR Election Adviser. The ODIHR NAM was joined by Sherif Abdili, Programme and Administrative Officer of the OSCE Parliamentary Assembly.

The purpose of the mission was to assess the pre-election environment and the preparations for the elections. Based on this assessment, the NAM recommends whether to deploy an ODIHR election-related activity for the forthcoming elections, and if so, what type of activity best meets the identified needs. Meetings were held with officials from state institutions and the election administration, as well as representatives of political parties, media, civil society, and the international community. A list of meetings is annexed to this report.

ODIHR would like to thank the Ministry for Europe and Foreign Affairs of the Republic of Albania for the assistance in organizing the visit. ODIHR would also like to thank all of its interlocutors for taking the time to meet with the NAM and to share their views.

II. EXECUTIVE SUMMARY

On 5 December 2024, President Bajram Begaj called parliamentary elections for 11 May 2025. The elections will take place in the context of deep distrust between the ruling Socialist Party and the opposition led by the Democratic Party. These elections are broadly regarded as a historic milestone for the country as it prepares for its first out-of-country voting.

The 140 members of the parliament will be elected for a four-year term through a recently modified regional proportional representation system, with voters being able to cast preferential votes for individual candidates from party lists. In addition, a number of candidates constituting one-third of allocated constituency seats will be elected through closed lists. Several ODIHR NAM interlocutors questioned the fairness of the electoral system in place, as potentially unduly favouring the larger parties.

The Electoral Code was last amended in 2024, introducing provisions for out-of-country voting to be implemented through postal voting, modifying the electoral system by adding a closed list component alongside existing preferential voting lists, specifying the competencies of the Central Election Commission (CEC) in organizing overseas voting, and addressing the registration of voters residing abroad. Many previous ODIHR recommendations remain unaddressed, including those related to de-politicisation of lower-level election commissions, suffrage rights of persons with intellectual or psychosocial disabilities, criminal liability for defamation, and equal rights of party and citizen election observers.

Preparations for the elections are ongoing, and the CEC, together with other public institutions are in the process of addressing logistical complexities and potential vulnerabilities associated with the administration of overseas voting. Many ODIHR NAM interlocutors highlighted the overall efficient and

consultative work of the CEC. At the same time, several others expressed declining levels of confidence with respect to the State Commissioner and raised concerns regarding impartiality of the lower-level election commissions.

Voter registration is passive, except for people residing abroad who must actively register. Citizens found incompetent by a court decision cannot vote, which is at odds with international standards. No significant issues related to the accuracy of the preliminary voter lists and voter registration in general were raised by ODIHR NAM interlocutors. Some 3.6 million voters are registered for the upcoming elections.

The elections can be contested by candidates nominated by political parties, coalitions of parties, or groups of voters. The ODIHR NAM interlocutors did not raise any issues about the candidate registration process, although some claimed that addition of closed lists was introduced to favour large parties as it by increased their control over candidate selection and nomination. The Electoral Code requires that one in every three candidates on both lists must belong to the less represented gender. Non-compliance with this requirement will result in the denial of registration of the list.

Women are well represented in ministerial positions, holding half of the posts in the current government but they remain under-represented in parliament, holding 36 per cent of seats. In 2021, the government adopted a National Strategy for Gender Equality which aims, among others, to ensure equal participation and representation of women and men in political life and public decision-making at the local level.

The official campaign period starts 30 days and ends 24 hours before election day. While no significant issues were raised about the ability of political parties and candidates to campaign freely, most interlocutors expect wide-spread cases of misuse of administrative resources by the ruling party, including pressure on public employees. In addition, the influence of criminal groups on politics, continued allegations of vote-buying, especially among the socially vulnerable communities, and so-called 'patronage' voting remains a major concern.

Election campaign may be financed from public and private funds, including loans. The law sets limits for donations and expenditures for campaign finance and provides disclosure requirements. The CEC oversees compliance with campaign finance regulations and is authorized to apply sanctions. Several ODIHR NAM interlocutors suggested that the campaign finance regulations could be further improved, including with regards to introducing more effective and dissuasive sanctions and regulating third-party campaigning.

The Constitution provides for freedom of expression, media freedom, and the right to information while explicitly prohibiting censorship across all communication channels. Defamation remains a criminal offense, punishable with fines and the legislation lacks adequate safeguards against abusive litigation. Some ODIHR NAM interlocutors raised serious concerns regarding precarious conditions for investigative journalists who work under pressure and potential retaliation. While diverse, media environment is politically polarized and characterized by high ownership concentration and continued strong influence of politics and business on media freedom and journalism. The Electoral Code requires the media to provide unbiased information and to treat contestants equally.

Electoral contestants have the right to file complaints against election administration bodies. Decisions of the Commissioner and the CEAZs, including those concerning election results, may be appealed to the Complaints and Sanctions Commission (CSC). Decisions of the CSC and of the CEC Regulator can be challenged to the Electoral College of the Court of Appeals of Tirana whose decisions are final. Some ODIHR NAM interlocutors noted dissatisfaction with the protracted decision-making processes and systematic delays in delivering justice.

The law provides for international and citizen election observation. All contestants may appoint observers, and the right to appoint observers within a coalition, rests solely with the coalition and not the parties within it. Several citizen observer groups informed the ODIHR NAM of their intention to observe the elections, including the election administration and other components of the electoral process and use of administrative resources.

All ODIHR NAM interlocutors underscored the necessity of a large-scale ODIHR election observation activity, emphasizing the importance of deploying well in advance of election day and across all regions to ensure an independent and impartial scrutiny of the entire electoral process. Representatives of state institutions highlighted the added value of ODIHR electoral recommendations for improving the electoral framework and practices. Many interlocutors stressed the critical importance of observing the pre-election day period, especially with respect to use of state resources and the potential implications for a level playing field. They identified many aspects that would warrant specific attention, including the work of the election administration, the introduction and application of new technologies in the elections, the campaign and its coverage by the media and online, campaign finance, resolution of election disputes and election day procedures.

Based on these considerations, the ODIHR NAM recommends the deployment of an Election Observation Mission (EOM) for the 11 May 2024 parliamentary elections. In addition to a core team of experts, the ODIHR NAM recommends the secondment by OSCE participating States of 26 long-term observers to follow the electoral process countrywide, as well as 300 short-term observers to observe election day procedures, including voting, counting of votes and tabulation of results. In line with ODIHR's standard methodology, the EOM would include a media monitoring element.

III. FINDINGS

A. BACKGROUND AND POLITICAL CONTEXT

Albania is a parliamentary republic, with legislative powers vested in a 140-member unicameral parliament elected for four-year terms. The government led by the prime minister has broad executive powers. The president is the head of state and is elected by parliament for a five-year term. Deep polarization continues to characterize Albanian politics, often accompanied by internal party conflicts and allegations of corruption; the Socialist Party (SP), the Democratic Party (DP) and the Freedom Party (FP) dominate the political scene. Governance is frequently challenged by accusations of political bias, misuse of state resources, and concerns over the impartiality of the judiciary, underscoring a persistent challenges to democratic consolidation.

In the 2021 parliamentary elections, the ruling SP secured a parliamentary majority, with its leader Edi Rama retaining the post of prime minister for a third term since 2013.¹ The SP also won in the majority of municipalities during the 2023 local elections, maintaining its political strength despite ongoing criticisms related to governance and corruption. Meanwhile, DP has been experiencing significant internal conflicts between its factions, resulting in legal disputes over party representation.² In late 2024, key opposition figures faced legal challenges: DP leader and former Prime Minister Sali Berisha was released from house arrest after a Special Court revoked corruption-related charges, while FP leader and former President Ilir Meta was arrested on allegations of corruption, money laundering, and asset disclosure violations. Political party representatives from opposition told ODIHR NAM that these legal

¹ In 2021 elections, SP received 74 seats; the DP-led "Alliance for Change" – 59 seats; Socialist Movement for Integration – 4 seats and Social Democratic Party (SDP) – 3 seats.

² Internal discord started after former Prime Minister and former DP chair Sali Berisha denounced the results of the 2021 parliamentary elections and launched a campaign for the resignation of then DP chair Lulzim Basha.

actions are perceived as politically motivated, constituting a broader effort to suppress political opposition. Several other interlocutors further opined that credible elections could only be ensured through the establishment of a technical government.

A significant change ahead of the 2025 parliamentary elections is the introduction of out-of-country voting, which, for the first time, will allow overseas Albanians to participate in elections. While various stakeholders have raised concerns about the logistical complexities and potential vulnerabilities associated with the administration of overseas voting, these elections are broadly regarded as a historic milestone for the country. On 5 December 2024, the President Bajram Begaj called parliamentary elections for 11 May 2025.

Women are well represented in ministerial positions, holding half of the posts in the current government but remain under-represented in parliament, holding 50 out of 140 (36 per cent) seats.³ There are five women among the current eight judges of the Constitutional Court. In 2021, the government adopted a National Strategy for Gender Equality which aims, among others, to ensure equal participation and representation of women and men in political life and public decision-making at the local level.⁴

ODIHR has previously observed 16 elections and referenda in Albania.⁵ Most recently, ODIHR deployed an Election Observation Mission to the 2023 local elections. The final report, issued in September 2023, contains 27 recommendations, including 8 priority ones, to improve the electoral process and bring it closer in line with OSCE commitments.⁶

B. LEGAL FRAMEWORK AND ELECTORAL SYSTEM

Parliamentary elections are primarily regulated by the Constitution and the Electoral Code (last amended in 2024). Secondary legislation includes the Law on Political Parties, the Law on Demonstrations, the Law on Gender Equality and the Law on Guaranteeing the Integrity of Persons Elected, Appointed, or Exercising Public Functions (the so-called Law on Decriminalization), as well as regulations issued by the Central Election Commission (CEC). Albania is a party to major international instruments related to democratic elections.⁷

The Electoral Code was amended in 2021 and 2024. In line with prior ODIHR recommendation, the 2021 amendments removed one per cent nationwide threshold for independent candidates, which challenged the principle of standing on equal terms with party nominated candidates. The key 2024 amendments introduced provisions for out-of-country voting, to be implemented through postal voting, specified the competencies of the CEC in organizing overseas voting and introduced provisions related to registration of voters residing abroad.⁸ The amendments also modified the electoral system by adding a closed list

³ See [2024 Inter-parliamentary Union data](#) on ranking of women in national parliaments.

⁴ See the [2021-2030 National Strategy For Gender Equality](#).

⁵ See previous [ODIHR election-related reports on Albania](#).

⁶ In Paragraph 25 of the 1999 OSCE Istanbul Document, OSCE participating States committed themselves “to follow up promptly the ODIHR’s election assessment and recommendations”. See ODIHR Electoral Recommendations Database at [Paragraph25.odihr.pl](#).

⁷ Including the 1966 [International Covenant on Civil and Political Rights](#) (ICCPR), 1965 [International Convention on the Elimination of All Forms of Racial Discrimination](#), 1979 [Convention on the Elimination of All Forms of Discrimination against Women](#) (CEDAW), 1990 [International Convention on the Protection of the Rights of All Migrant Workers and Members of their Families](#), 2003 [UN Convention against Corruption](#), 2006 [Convention on the Rights of Persons with Disabilities](#) (CRPD), as well as the 1950 [European Convention on Human Rights](#) and the 1998 [Framework Convention for the Protection of National Minorities](#). Albania is a member of the Council of Europe’s Commission for Democracy through Law (Venice Commission) and of the Group of States against Corruption (GRECO).

⁸ These amendments were approved by the parliament with 106 votes in favour, and were made in response to previous Constitutional Court ruling on modifying the electoral system and introducing the out-of-country voting.

component, in addition to the existing preferential voting lists. These amendments have encountered substantial criticism with several small parties challenging the mixed candidate list system in the Constitutional Court, claiming that addition of closed lists was designed to favour large parties by increasing their control over candidate selection. At the time of reporting, no decision has been made by the Constitutional court.

While ODIHR recommendations on nationwide threshold for independent candidates and the possibility for political party leaders to compete in several electoral districts were addressed, many previous ODIHR recommendations remain unimplemented. These include recommendations related to composition of lower-level election commissions, suffrage rights of persons with intellectual or psychosocial disabilities, criminal liability for defamation, independent media coverage during electoral campaigns, and the extension of campaign finance regulations to third parties.

The 140-member parliament is elected for a four-year term through a modified regional proportional system. Candidates are elected from 12 multi-seat electoral districts, which correspond to administrative regions.⁹ Voters can select both a party/coalition and their preferred candidate, in the multi-name preferential voting list matching the number of available seats in each electoral zone. Voters may influence candidate rankings based on the highest number of preferential votes received by each candidate. In addition, a number of candidates constituting one-third of allocated constituency seats will be elected through closed lists. To qualify for seat allocation in the parliament, candidates on party or coalition lists must surpass a one percent threshold nationwide.

C. ELECTION ADMINISTRATION

Parliamentary elections are administered by the CEC, 92 Commissions of Electoral Administration Zones (CEAZs) and around 5,200 Voting Centre Commissions (VCCs). Counting is conducted regionally by Counting Teams in 92 Ballot Counting Centres (BCCs), one in each Electoral Administration Zone (EAZ).

The CEC consists of three branches: the State Election Commissioner (the Commissioner) and Deputy Commissioner, the Regulatory Commission (the Regulator) and the Complaints and Sanctions Commission (CSC).¹⁰ The Regulator and the CSC are each composed of five members. All CEC members are elected by parliament by no less than three-fifths of the votes.

Following the 2024 amendments, the CEC assumed responsibility for registering and organizing voting for overseas citizens. Subsequently, the Regulatory Commission had to approve four regulations related to out-of-country voting within 90 days of the amendments' entry into force. The Regulator successfully approved three regulations addressing voter lists, voter registration processes, and operational and technical aspects of voting within the deadline. However, a regulation on ballot counting and administration was adopted with delay largely due to CEC's attempt to align it with regulatory framework of other involved institutions as well and to ensure compliance with technical requirements. To ensure comprehensive preparations and facilitate the administration of out-of-country voting, a special inter-agency working group was established, comprising representatives from the CEC, Ministry of Internal Affairs (MIA), Ministry of Europe and Foreign Affairs, and other relevant institutions.¹¹ Currently, the

⁹ The number of seats in each district depends on the number of citizens registered in the respective district.

¹⁰ The Commissioner exercises executive powers, steers the staff and represents the CEC in relations with third parties. The Deputy Commissioner supervises the voter identification technology as well as recruitment and training of election officials. The Regulator adopts by-laws and other normative acts. The CSC is in charge of handling complaints against the Commissioner and the CEAZs.

¹¹ All Albanian state and private entities involved in the out-of-country voting process must comply with the Election Code and associated CEC regulations.

CEC is in the process of holding consultations with major postal services to determine the modalities and costs associated with ballot delivery.

The CEC activities are open and live-streamed online. The CEC proactively shares draft regulations with political parties, civil society organizations, and media representatives before formal adoption, seeking their input and commentary. However, several interlocutors informed ODIHR NAM that the received feedback is not consistently incorporated into final decisions, and when modifications occur, they are rarely explicitly attributed to external input or collaborative efforts.

The CEC appoints the CEAZs who are responsible for organizing the elections in their respective EAZs, appointing the VCCs and counting teams and tabulating election results. The VCCs are responsible for organizing voting, as well as transporting ballots and other election materials after the completion of voting to the relevant BCCs. The CEAZs and VCCs each have seven members nominated by the parliamentary majority and opposition parties.¹² Despite previous ODIHR recommendations, political parties may still recall their nominees from the lower-level commissions at their own discretion.¹³ The counting teams are composed of four members, with two members representing the parliamentary majority and two – the parliamentary opposition.

According to the CEC, for the first time, election commissioners will be trained by a newly established training centre, providing standardized training for both selected commissioners and candidates in the reserve pool. The CEC also acknowledged the need for a comprehensive voter information campaign to raise awareness among stakeholders, including about new voting procedures and candidate nomination rules. The CEC is preparing a public awareness campaign to enhance participation of women, first-time-voters, national minorities, including Roma community, and persons with disabilities in the electoral process. To improve the inclusiveness and participation of persons with disabilities, the CEC has been identifying adapted premises for voting centres, ensuring that an increasing number of polling locations are accessible to voters with physical disabilities.¹⁴

According to the CEC, for these elections, electronic voting (e-voting) will be administered in Tirana city and region.¹⁵ Several ODIHR NAM interlocutors expressed contrasting views regarding planned implementation of e-voting. Small political parties favoured extension of e-voting in other regions, while others have expressed reservations regarding its use due to alleged abuse of voting machines and prefer temporary suspension of e-voting.

Many ODIHR NAM interlocutors highlighted the overall efficient and consultative work of the CEC. At the same time, several others noted a declining level of confidence with respect to the State Commissioner, citing perceived erosion of impartiality, largely stemming from some of the Commissioner's decisions related to oversees voting and electronic voting. Some political party representatives alleged potential vote count manipulations, attributing these concerns to the ongoing challenges in depoliticizing lower-level electoral commissions and ensuring their impartiality.

¹² The largest parliamentary majority and the largest opposition parties propose two CEAZ members each. In addition, the next largest parliamentary majority and opposition parties propose one member each.

¹³ Section II.3.1.f of the Venice Commission's 2002 Code of Good Practice in Electoral Matters, states: "the bodies appointing members of electoral commissions must not be free to dismiss them at will".

¹⁴ In 2021, the government adopted the [2021-2025 National Action Plan for Persons with Disabilities](#) with the aim to ensure, among others, full involvement of persons with disabilities in public and political life.

¹⁵ As a contingency measure, all VCs will be supplied with paper ballots in case electronic voting is not possible.

D. VOTER REGISTRATION

Albanian citizens aged 18 years or older on election day are eligible to vote. Citizens found incompetent by a court decision cannot vote, at odds with international obligations prohibiting discrimination based on disability.¹⁶ Suffrage rights are also suspended for citizens serving a prison sentence for committing certain crimes.¹⁷ The voter registration system is passive, except for out-of-country voters, who must register actively. Voters over 100 years of age are automatically removed from the voter lists and have to confirm their status for inclusion. There are around 3.6 million registered voters.

Voter lists are compiled based on the data of the electronic National Civil Status Register (NCSR), maintained by the General Directorate of Civil Status (GDSCS) of the MIA. After the elections are called, the GDSCS publishes monthly voter list extracts enabling voters to register changes through local civil status offices.¹⁸ Corrections to voter records are possible within 60 days from the publication of extracts. As of then, and up to 24 hours before election day, requests for change or inclusion in the voter lists can be made only through a district court.

For the first time, Albanian citizens residing abroad will have the opportunity to vote in upcoming parliamentary elections. The CEC and the GDSCS will maintain a database of overseas voters, while the CEC will compile voter lists for each election. The registration process opens on 11 January with voters required to submit necessary documentation through an electronic platform developed by the CEC.¹⁹ Following verification of submitted data, the CEC will publish a preliminary voter list and voters have a 48-hour window to review and request corrections. The final voter list will be published 60 days before election day.

Most ODIHR NAM interlocutors did not raise significant issues related to the accuracy of voter lists in general. However, many interlocutors expressed concerns that approximately 600,000 citizens, including those abroad, have expired identification documents and therefore may not be able to vote. The CEC informed the ODIHR NAM that overseas voters with expired IDs can initially register through the electronic platform but will be required to renew their identification documents to be ultimately included in the voter lists.²⁰

On election day, voter identification is facilitated by e-identification devices managed by technical operators. Voters are electronically verified by cross-referencing presented ID cards or passport data against the data held in the e-identification device. A fingerprint is also scanned to substitute the signing process on a paper voter list. Following the e-identification, the VCC receives a printed receipt with the voter's personal data and photo for possible post-election verification. Many ODIHR NAM interlocutors, including the State Commissioner, underscored the importance of well-prepared technical personnel to ensure efficient maintenance of voter identification devices and effectively resolve potential system malfunctions on election day, while expressing confidence in the reliability of the system overall.

¹⁶ Article 29 of the CRPD requires States to “guarantee to persons with disabilities political rights and the opportunity to enjoy them on an equal basis with others”. See also Paragraph 48 of General Comment No. 1 to Article 12 of the CRPD. Paragraph 7.3 of the 1990 OSCE Copenhagen Document commits participating States to “guarantee universal and equal suffrage to adult citizens”.

¹⁷ The Law on Decriminalization suspends the voting rights of citizens serving a prison sentence for crimes listed in more than 80 articles of the Criminal Code (ranging from election related offences to severe crimes).

¹⁸ The voter lists are made available upon request and free of charge to political parties, coalitions and registered independent candidates. Online versions are also available on the GDSCS and CEC websites.

¹⁹ Voters are required to submit personal information and documentation, including proof of residency abroad, an Albanian passport, and any other necessary identification document.

²⁰ Citizens can renew ID documents online. According to the MIA, overseas citizen can apply for renewal and receive their IDs abroad.

E. CANDIDATE REGISTRATION

Any eligible voter has the right to stand, except those serving a prison sentence. The legislation retains restrictions on right to stand for citizens with a prior conviction for specific crimes as well as those deported from a number of countries or subject to a search warrant, despite prior ODIHR recommendation.²¹ The Constitution lists categories of officials whose position is incompatible with the right to stand.

Candidate lists can be submitted by political parties and coalitions of parties, which are first registered with the CEC as electoral subjects. Independent candidates can stand for elections through the nomination by groups of voters. Candidate lists must be submitted for each of the 12 electoral districts.²² Candidacies are verified by the CEC in line with the Electoral Code and Law on Decriminalization.

Following the 2024 legal amendments, parties and coalitions are required to submit two types candidate lists to the CEC: a closed list with a predetermined numerical order of candidates, and a separate list for preferential voting. The closed list must include number of candidates equal to one-third of the available mandates in each electoral zone. The number of candidates nominated in each preferential voting list may not be less than the number of seats allocated to the respective electoral district plus one and is organized alphabetically by candidates' surnames.²³ Failure to submit a sufficient number of candidates in any given district may lead to denial in registration. A candidate may not appear in multiple electoral zones or on both types of lists simultaneously. In line with prior ODIHR recommendation, a possibility for leaders of political parties to compete in several electoral districts was cancelled.

The Electoral Code requires that one in every three candidates on both lists must belong to the less represented gender. Non-compliance with these requirements will result in the denial of registration of the list. No ODIHR NAM interlocutors raised any concerns regarding the candidate registration process.

F. ELECTION CAMPAIGN AND CAMPAIGN FINANCE

The official campaign period starts 30 days and ends 24 hours before election day. There are no sanctions for early campaigning. Civil servants may not participate in political activities during office hours and campaigning by public institutions is prohibited. The legal framework prohibits the misuse of state resources and limits budgetary expenditures during the four months before election day. During this period, public institutions, as well as state agencies and enterprises, must report to the CEC any activities involving citizen and media participation. The CEC can declare such activity as potentially constituting a misuse of state resources. In such cases, broadcast media are prohibited from featuring these activities in the news or campaign-related coverage.

The campaign is expected to focus on topics such as the social welfare, inflation, cost of living, emigration, rising crime rate and the efficiency of justice system. Most interlocutors expect wide-spread misuse of state resources by the ruling party, including pressure on public employees. Concerns also persist about the alleged influence of criminal groups on politics, continued claims of vote-buying, especially among the socially vulnerable communities, such as Roma, and so-called 'patronage' voting. Furthermore, many ODIHR NAM interlocutors noted their apprehensions regarding impunity or the lack

²¹ The Law on Decriminalization refers to deportation from an EU Member State, Australia, Canada and the United States. It also references citizens convicted for certain crimes.

²² Candidate lists require 5,000 signatures for parties or 7,000 signatures for coalitions nationwide, and by one per cent of voters in an electoral district (but no more than 3,000 voters) for independent candidates. The parliamentary parties and coalitions with a sufficient number of seats are exempt from signature collection. Voters can support multiple lists.

²³ In any case, the number of nominated candidates in a list must be divisible by a factor of three for the purpose of accounting for the gender quota.

of decisive measures against those who violated electoral legislation during previous elections, and anticipated their recurrence in upcoming elections.

Election campaign may be financed from public and private funds, including loans. Parliamentary parties receive annual support from the state budget, and parties that gained more than one per cent of valid votes in the previous parliamentary elections are entitled to public funding of their campaigns. Independent candidates are not entitled to public funding.

Donations from both citizens and legal entities, including in-kind, are capped at ALL 1 million (some EUR 10,150), with contributions over ALL 50,000 requiring bank transfer and disclosure.²⁴ Campaign expenses are limited to three times the highest amount received from public funds for political parties and 50 per cent of this amount for independent candidates. Contestants are required to register detailed donation information and donor identification in a special CEC register and submit campaign finance reports within 60 days following the announcement of election results.

To ensure compliance with campaign finance rules, the CEC may appoint monitors to follow the election campaign and verify adherence to campaign regulations. Following the declaration of final election results, the CEC will designate auditors to review the campaign funds of each contestant. The CEC must publish auditors' reports within 30 days of their submission and is authorized to verify information in the reports and impose sanctions on contestants for non-compliance with campaign finance rules. Several ODIHR NAM interlocutors suggested that the campaign finance regulations could be further improved, including with regards to introducing more effective and dissuasive sanctions and regulating third-party campaigning.

G. MEDIA

The media landscape includes a range of outlets and is characterized by a growing shift toward digital consumption, with online media progressively replacing print publications. Television (TV) remains the most trusted source of political information, with popular online outlets often reproducing content from major TV stations. The public broadcaster, Albanian Radio and Television (*RTSH*), is required to present diverse political viewpoints during campaigns. Print media remains largely self-regulated.

The Constitution guarantees freedom of expression, media freedom, and the right to information, explicitly prohibiting censorship across all communication channels.²⁵ Despite previous ODIHR recommendations, defamation remains a criminal offense, punishable with fines. The legislation lacks adequate safeguards against abusive litigation, such as Strategic Lawsuits Against Public Participation (SLAPP), which significantly undermines freedom of expression. According to the European Commission, journalists continue to face significant challenges, including persistent verbal and physical attacks, as well as targeted smear campaigns, while prevalence of abusive litigation in 2024 including by public officials, created a hostile environment for media professionals.²⁶ Several ODIHR NAM interlocutors acknowledged increase of SLAPPs but highlighted that number of such lawsuits does not capture the precarious reality confronting investigative journalists operating under constant pressure and potential retaliation including by organized crime networks.²⁷

²⁴ Some entities are not allowed to donate funds, including those in the media sector or those that received public funds or secured public contracts exceeding ALL 10 mln. in the three years prior to the elections. EUR 1 equals approximately ALL 98 (Albanian *Lek*).

²⁵ The restrictions on freedom of expression include defamation, libel, hate speech, copyright infringement, and data protection laws.

²⁶ See Subchapter Freedom of Expression (p.36-38) of the [Albania 2024 Report by the European Commission](#).

²⁷ According to [Reporters Without Borders](#), Albania ranked 99 in 2024 dropping three positions from 2023.

The media environment is characterized by high ownership concentration in the hands of few owners, and continued strong influence of politics and business on media freedom and journalism, making the latter vulnerable to pressure, and encouraging self-censorship.²⁸ The media regulator, Audio-visual Media Authority (AMA) regularly publishes updated information about media ownership contributing to transparency.²⁹ Still, several ODIHR NAM interlocutors expressed concerns regarding the lack of comprehensive transparency of ultimate media ownership. The 2023 amendments to the Law on Audio-visual Media only require broadcasters to disclose information about their beneficial owners, while digital news media outlets remain largely unregulated.³⁰ According to media experts that ODIHR NAM met with, the media regulatory framework also lacks effective safeguards against potential conflicts of interest between media owners and partisan groups.

The Electoral Code provides for unbiased campaign coverage and equal treatment of electoral contestants in news and information programmes in broadcast media.³¹ All political advertisements and free airtime must clearly identify the sponsoring party. According to several ODIHR NAM interlocutors, the broadcaster formally comply with airtime allocation requirements however content of their coverage is polarised, reflective of political division. In addition, political parties and public institutions continue to provide media with pre-recorded or live event footage, which broadcasters frequently use without proper labelling. Several ODIHR NAM interlocutors also claimed substantial underreporting of real spending by large political parties for electoral purposes, especially for campaigning in online media. The CEC has informed ODIHR NAM that, for the first time, it plans to establish a special unit to monitor online campaign, including in terms of spending.

The AMA is in charge of monitoring broadcast media's campaign coverage. Within the official campaign period, AMA should present monitoring reports to the CEC on a daily basis. The CEC considers complaints concerning media coverage in co-operation with AMA and can apply fines on media outlets for non-compliance with the law.

H. ELECTION DISPUTE RESOLUTION

According to the Electoral Code, decisions of election administration bodies can be challenged to the CEC only by parties, and independent candidates standing for the elections. Citizen observers can only challenge CEC and CEAZ decisions concerning their accreditation. Complaints against the decisions of the Commissioner and CEAZs, including those regarding the election results, are submitted to the CSC, while complaints and appeals against other entities of the CEC can be brought to the Electoral College of the Court of Appeals of Tirana (Electoral College), whose decisions are final.³² Voters can complain to first instance courts about voter registration issues.

Overall, ODIHR NAM interlocutors did not express major concerns regarding the independence of the judiciary. However, they consistently highlighted dissatisfaction with the judicial system's inefficiencies,

²⁸ See [Monitoring Media Pluralism in the Digital Era](#) – 2024 Country report: Albania. See also [Media Ownership Monitor Albania 2023](#) by Balkan Investigative Reporting Network

²⁹ See [Transparency of Media Ownership](#) by AMA.

³⁰ Their sole administrative requirement is domain registration. This registration process is open to any individual or organization, whether commercial or non-profit, and it does not involve any significant regulatory oversight.

³¹ Each political party that won over 20 per cent of seats in the last parliamentary elections should receive twice the amount of news coverage that other parliamentary parties receive. News coverage of non-parliamentary parties is at the discretion of the editors but should not exceed that of the parliamentary parties. The Electoral Code allows paid political advertisement on private media – up to 90 minutes for parliamentary and 10 minutes for non-parliamentary parties and independent candidates on each channel.

³² The Electoral College, the highest authority on electoral disputes, consists of eight judges from the first instance and appeal courts appointed for a four-year term.

specifically emphasizing protracted decision-making processes and systematic delays in delivering justice.

I. CITIZEN AND INTERNATIONAL ELECTION OBSERVATION

The Electoral Code provides for citizen and international observation at all levels of the election administration. Parliamentary parties and coalitions may appoint permanent representatives to the CEC, while other parties have the right to appoint representatives to the CEC only for the electoral period. All contestants are entitled to appoint observers to relevant CEAZs, VCCs, and BCCs. The right to appoint observers within a coalition rests solely with the coalition and not the parties within it. Despite a previous ODIHR recommendation, only observers from the contesting parties but not citizen or international observers are entitled to receive copies of the results protocols at BCCs and CEAZs.

Several civil society interlocutors informed the ODIHR NAM of their plans to observe the administration of elections and other components of the electoral process and potential use of administrative resources in these elections. However, these observation efforts are contingent upon securing sufficient funding for their planned activities. According to the European Commission, Civil Society Organizations operate in a challenging environment where the legal framework provides only partial support for organizational funding, further compounded by a lack of donor support for their activities and other limitations in place.³³

IV. CONCLUSION AND RECOMMENDATION

All ODIHR NAM interlocutors underscored the necessity of a large-scale ODIHR election observation activity, emphasizing the importance of deploying well in advance of election day and across all regions to ensure an independent and impartial scrutiny of the entire electoral process. Representatives of state institutions highlighted the added value of ODIHR electoral recommendations for improving the electoral framework and practices. Many interlocutors stressed the critical importance of observing the pre-election day period, especially with respect to use of state resources and the potential implications for a level playing field. They identified many aspects that would warrant specific attention, including the work of the election administration, the introduction and application of new technologies in the elections, the campaign and its coverage by the media and online, campaign finance, resolution of election disputes and election day procedures.

Based on these considerations, the ODIHR NAM recommends the deployment of an Election Observation Mission (EOM) for the 11 May 2025 parliamentary elections. In addition to a core team of experts, the ODIHR NAM recommends the secondment by OSCE participating States of 26 long-term observers to follow the electoral process countrywide, as well as 300 short-term observers to observe election day procedures, including voting, counting of votes and tabulation of results. In line with ODIHR's standard methodology, the EOM would include a media monitoring element.

³³ Subchapter on Civil Society (p.29) of the [Albania 2024 Report by the European Commission](#) notes that the national electronic register of non-profit organizations remains incomplete, missing its planned 2023 implementation deadline. Other deficiencies include an ineffective VAT exemption scheme that impedes foreign aid program implementation, an absence of tax incentives for individual donations, and minimal tax benefits for corporate contributions.

ANNEX: LIST OF MEETINGS

Government Institutions

Armand Skapi, Director, General Secretary, MEFA
Adriana Hobdari, Director of the Department of International Organisations, MEFA
Kujtim Morina, Desk officer, Department of International Organisations, MEFA
Shpetim Çokaj, General Director, Civil Registry Administration, Ministry of Internal Affairs
Armela Krasniqi, Chair, Audio-visual Media Authority
Ronelda Rapollari - Secretary General, Audio-visual Media Authority
Alida Cenaj, Advisor, Audio-visual Media Authority

Central Election Commission

Ilijan Celibashi, State Election Commissioner
Erton Sinani, Chief of Staff
Ilijana Nano, Chair, Regulatory Commission
Helga Vukaj, Member, Regulatory Commission
Ilijan Rusmali, Member, Complaints and Sanctions Commission
Ledio Braho, Member, Complaints and Sanctions Commission
Elvin Lako, Member, Complaints and Sanctions Commission
Elvis Cefa, Member, Complaints and Sanctions Commission
Koli Bele, Member, Complaints and Sanctions Commission

Political Parties

Oerd Bylykbashi, MP, Deputy Chairperson, Democratic Party
Ivi Kaso, Secretary for Electoral Issues, Democratic Party
Franc Nuri, Representative to the CEC, Democratic Party
Thoma Mico, MP, Deputy Chairperson, Environmental-Agrarian Party
Edmond Haxhinasto, National Steering Committee Chair, Freedom Party
Erisa Xhixho, MP, Deputy Chairperson, Freedom Party
Tedi Blushi, Secretary General, Freedom Party
Petrit Vasili, MP, Member, Freedom Party
Dashmir Shehi, MP, National Development Movement
Blendi Klosi, MP, Secretary General, Socialist Party
Damian Gjajnuri, MP, Socialist Party

Media

Altin Krekas, Top Channel TV
Kristina Voko, BIRN
Aleksander Cipa, Union of Journalists
Nevila Gjata, Faktoje

Civil Society

Bledar Taho, Institute of Romani Culture in Albania
Dritan Taulla, KRIIK Albania
Antuela Male, KRIIK, Election Analyst
Gerta Meta, Society for Democratic Culture

International Community

OSCE Presence in Albania
Representatives of diplomatic mission of Austria, France, Greece, Italy, Portugal, Sweden, Switzerland, Türkiye, and United Kingdom.³⁴

³⁴ The ODIHR NAM extended an invitation to representations of all OSCE participating States resident in Albania.