ANNUAL REPORT 2024:

Tracking Albania's Progress on Media Freedom and Journalistic Safety in Line with European Union Standards

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DISCLAIMER

This report, titled "Annual Report 2024: Tracking Albania's Progress on Media Freedom and Journalistic Safety in Line with EU Standards", has been developed by a dedicated research team comprising experts in various fields.

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This report reflects the collective commitment and dedication of all contributors to advancing media freedom and journalistic safety in Albania. While every effort has been made to ensure the accuracy and thoroughness of the information presented, this report reflects the findings, interpretations and conclusions of the research team and contributors. It is not intended to represent an absolute or definitive account but rather a comprehensive analysis based on the available data and perspectives at the time of publication.

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ABBREVIATIONS

AMA	Audiovisual Media Authority
AMC	Albanian Media Council
AMSD	Audiovisual Media Service Directive
ASPA	Albanian School of Public Administration
BIRN	Balkan Investigative Reporting Network
EMFA	European Media Freedom Act
ESAP	Employment and Social Affairs Platform
EU	European Union
FIMI	Foreign Information Manipulation and Interference
FOI	Freedom of Information
ILO	International Labor Organization
JIC	Joint Industry Committee
KLGJ	High Judicial Council (Këshilli i Lartë Gjyqësor in Albanian)
MIA	Media and Information Agency
MPS	Penalty Matrix System
ODHIR	Office for Democratic Institutions and Human Rights
OJQ	Non-Governmental Organization
OSCE	Organization for Security and Co-operation in Europe
RTSH	Radio Televizioni Shqiptar (Albanian Radio and Television)
SAR	Risk Analysis System
SLAPP	Strategic Lawsuits Against Public Participation
TV	Television

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EXECUTIVE SUMMARY

This report evaluates Albania's progress in media freedom and journalistic safety in 2024. It focuses on the developments and challenges in Albania's media ecosystem in aligning with the European Union (EU) accession requirements and standards. The report applies a combined quantitative and qualitative data methodology to critically analyse Albania's media landscape amid its EU accession process. It argues that, despite efforts to meet EU benchmarks, significant obstacles persist, threatening journalism's independence, safety, integrity and professionalism. The state of media freedom and the safety of journalists showed no significant improvement in 2024.

Despite constitutional guarantees for freedom of expression, Albania faces entrenched issues, including political interference, high media ownership concentration and economic vulnerabilities that compromise journalistic integrity. Legislative efforts, such as the partial alignment of Albania's media laws with European standards, have not addressed critical gaps. The persistence of defamation as a criminal offense and the growing influence of digital platforms have created new challenges, including cyber-attacks and online harassment.

Albania's EU accession has been marked by milestones, including opening negotiations for Cluster 1 and 6, in October and December 2024, respectively. Albania has adopted two key roadmaps in response to the screening process and to align with EU benchmarks – the Rule of Law Roadmap and the Roadmap for Functioning of Democratic Institutions – that include media freedom and journalist safety provisions. However, implementation of the provisions was slow and delayed in 2024. In addition, partial compliance undermines the effectiveness of these measures. Moreover, the success of these measures in improving the enabling environment for quality journalism has yet to be assessed. Critical reforms, such as decriminalizing defamation and enhanced transparency and pluralism in media ownership, are yet to be fully realized.

Journalists in Albania face increasing threats and intimidation, including lawsuits and online harassment. This situation contributes to an environment of self-censorship and insecurity. Women journalists face gender-specific challenges, particularly verbal attacks, smear campaigns and online harassment, which disproportionately affect their ability to participate in the public space and work safely and freely.

The precarious working conditions of Albanian journalists highlight systemic vulnerabilities. Lack of employment contracts, low wages, informal payments, lack of job security and limited institutional support create an environment in which external pressures and interference from media owners, businesses, and politicians compromise journalistic integrity. These challenges are compounded by a lack of transparency in media financing and by concentrated media ownership, which prioritizes political or commercial interests over public accountability.

Although Albania has legal provisions ensuring access to information, enforcement is often inconsistent. Journalists regularly face delays from public institutions or outright refusals when requesting critical information. A mix of lack of institutional commitment and political willingness to proactive transparency, institutional inefficiencies, concentration of public information and usage of propaganda continues to limit access, making it harder for the press to play its watchdog role effectively.

The EU accession process has created momentum for reform. However, progress remains hindered by systemic challenges, limited enforcement, inconsistent policy implementation and a lack of genuine political commitment to transforming the media sector. While Albania's announced ambition to accelerate the EU accession process could provide opportunities to advance media reforms, it also risks reinforcing a 'tick-box' approach to policy development, prioritizing formality over meaningful change and delivering

minimal real impact. Key priorities include safeguarding journalists' safety and independence, increasing transparency in media ownership and market concentration, and improving access to information.

Addressing these issues is essential to protecting media freedom, ensuring public accountability and supporting Albania's democratic processes as it progresses toward EU membership.

1. INTRODUCTION

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1.1. Media freedom and journalists' safety context

In 2024, Albania ranked in 99th place out of 180 countries in the World Press Freedom Index,[1] marking a decline of three places compared to the previous year.[2] This ranking reflects persistent challenges to media freedom and the safety of journalists, as the sector remains deeply impacted by political interference, economic pressures and weak institutional safeguards. These structural issues create an environment in which media freedom and journalistic independence are under significant and continuous threat.

Freedom of expression is protected by the constitution in Albania and is regulated through a series of legal and regulatory measures. However, upholding such rights is undermined by practical constraints and gaps in implementation. The 2013 Audiovisual Media Law,[3] which forms the backbone of media regulation, was partially amended in 2023[4] to align with the 2018 Audiovisual Media Services Directive.[5] While these amendments addressed some aspects of European media policy, the overall legal framework in Albania has yet to be fully aligned with European standards. Defamation remains criminalized, with disproportionate fines that deter independent journalistic investigations and reporting.[6]

Furthermore, limited and ineffective legal protections for journalists facing threats or attacks compound the difficulties of operating in a free and fair media environment. In 2023, 24 attacks on journalists were

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[1] Reporters without Borders, Albania 2024

[2] Reporters without Borders, Albania 2023

[3] Law 97/2023 on audiovisual media

[4] Law 30/2023 on some changes to the audiovisual media law

[5] 2018 Audiovisual Media Services Directive

[6] Albania – Indicators on the Level of Media Freedom and Journalists' Safety Index 2023. Safe Journalists Network 2024

reported by the SafeJournalists Network, whereas in 2024, 45 incidents of threats, pressures and attacks on journalists and media organisations were reported, the majority being verbal attacks, antimedia discourses and online harassment.[7] Although Albanian law it doesn't contain a definition of Strategic Lawsuits against Public Participation (SLAPPs), defamation lawsuits remain a threat, targeting investigative journalists and media outlets.[8] In addition, the increasing reliance on digital platforms for news distribution has brought new challenges to media freedom and safety of journalists, such as cyber-attacks, doxing, online harassment, trolling and removal of content.[9]

The media sector in Albania is characterized also by precarious working conditions, with a lack of employment contracts, low wages, informal payments and limited job security.[10] These challenges are exacerbated by the high concentration of media ownership. The 2024 Media Pluralism Monitor[11] identified Albania as one of the European countries most at risk of media concentration. Media outlets are often controlled by individuals or entities with strong political and economic affiliations or vested interests,[12] leading to content manipulation that prioritizes private interests over public interest and accountability.

1.2.   Albania toward European Union accession

Albania's progress toward European Union (EU) accession was marked by two key milestones in 2024. The

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[7] Safe Journalists Network Incidents 2024 Albania

[8] Media Freedom in Albania: A Shadow Report by SCiDEV and OBTC, 2024.

[9] Digital Rights Report 2024 Albania

[10] National Barometer of Media Freedom 2022-2023, Albanian Helsinki Committee, 2024

[11] Media Pluralism Monitor, 2024

[12] Media Ownership Monitor, 2023

first was the opening of negotiation with Albania on Cluster 1 on 15th October 2024.[13] This includes: the functioning of democratic institutions; public administration reform; judiciary and fundamental rights; justice, freedom and security; economic criteria; public procurement; statistics and financial control. With regard to this, Albania approved the Rule of Law Roadmap (2023)[14] and the Roadmap for the Functioning of Democratic Institutions (2024)[15] which, among others, incorporate specific measures aimed at enhancing media freedom and the safety of journalists.

The second milestone was the opening on 17th December 2024[16] of negotiations with Albania on Cluster 6, on External Relations, including external relations and foreign, security and defence policy. The EU also set benchmarks for the provisional closure of these chapters for Cluster 1 and Cluster 6, included in the accession position of the EU.

In its 2024 conclusions on enlargement,[17] the Council of the European Union reaffirmed the centrality of the rule of law as a core value underpinning the EU. It emphasized that the *rule of law represents a critical component of democratic transformation and an essential requirement for progress toward EU membership.* The Council highlighted the protection of fundamental rights as a cornerstone of EU values and reiterated the importance of addressing reported shortcomings in this domain through credible measures.

Freedom of expression, media freedom, the protection of journalists and media pluralism were identified by the Council as foundational pillars of a democratic society. Aspirant countries, such as Albania, are expected to ensure these principles are upheld. These elements, among others, are recognized as vital for the proper functioning of democratic institutions and will remain priorities in the EU's monitoring of Albania's accession process.

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[13] Council of the European Union Notification, 15 October 2024
[14] Rule of Law Roadmap
[15] Roadmap for the Functioning of Democratic Institutions
[16] Council of the European Union Notification, 17th December 2024
[17] Council of the European Union 2024 Enlargement Conclusions

1.3. Report aim and structure

This report assesses Albania's progress in implementing EU accession measures for safeguarding media freedom and the safety of journalists. It evaluates institutional and regulatory changes in 2024 with the aim of tracking the country's alignment with EU accession requirements standards for media freedom and journalists' safety. Furthermore, the report explores the perceptions and experiences of journalists regarding media freedom and safety. Findings present a nuanced understanding of the challenges faced by media professionals in Albania, offering a data-driven perspective on the current environment. Coupled with the assessment of measures, they facilitate monitoring progress, identifying key gaps and highlighting areas that require further attention to meet EU benchmarks.

Following an introductory section that contextualizes the challenges that characterise media freedom and journalists' safety in Albania, the report outlines its methodology, emphasizing a mixed-methods approach that integrates both quantitative and qualitative data. Subsequent sections zoom into thematic areas, including EU recommendations on media freedom, perceptions of journalists during Albania's EU accession process, the implementation of Rule of Law Roadmap measures and safety conditions for journalists. The report also examines structural challenges, such as media ownership concentration, transparency in audience measurement and working conditions. Finally, the conclusions and recommendations provide actionable insights aimed at strengthening media freedom and safeguarding journalists' safety.

2. METHODOLOGY

2.1. Approach

This report employs a mixed-methods approach to systematically monitor Albania's progress on media freedom and the safety of journalists in alignment with EU recommendations. It also measures and analyses the perceptions and experiences of journalists to offer a nuanced view of the media environment and identify areas requiring reform. By combining quantitative and qualitative research methods, the report provides a solid foundation for assessing the country's advancements and ongoing challenges.

The report has consulted existing data sources and reports on media freedom and the safety of journalists, building upon them and offering complementarity of analysis and data. Key documents include independent reports: (i) Media Pluralism Report, Indicators on Media Freedom and Safety of Journalists, National Barometer for Media Freedom, Digital Rights Monitoring Report; (ii) public institutions' annual reports and action plans; (iii) EU Annual Report, EU Rule of Law Report; (iv) other relevant publications.

2.2. Survey design and sample

The report's design centred on two core objectives: tracking Albania's progress in implementing EU recommendations and assessing the experiences of media professionals. A quantitative research design was employed to collect demographic and professional data from journalists. A total of 139 journalists

participated in the survey[18] carried out in May and June 2024, offering insights into their perceptions of media freedom, safety concerns and professional conditions. Key variables included their professional roles, years of experience, educational background and the types of media they represent. This approach facilitated an understanding of how systemic and individual factors interact to shape the media landscape.

Of the 139 journalists surveyed, 51% were female and 49% were male. In terms of age distribution, the majority (56.1%) were 25-35 years old, followed by 24.5% in the 34-44 age bracket. A smaller proportion of respondents were under 25 (9.4%), 45-54 (7.2%), and 55-64 (2.9%). This demographic spread ensured the inclusion of both early-career and experienced journalists, providing a diverse range of perspectives.

Figure 1: *Profile of respondents by gender*

Male
Female
51.1%
48.9%
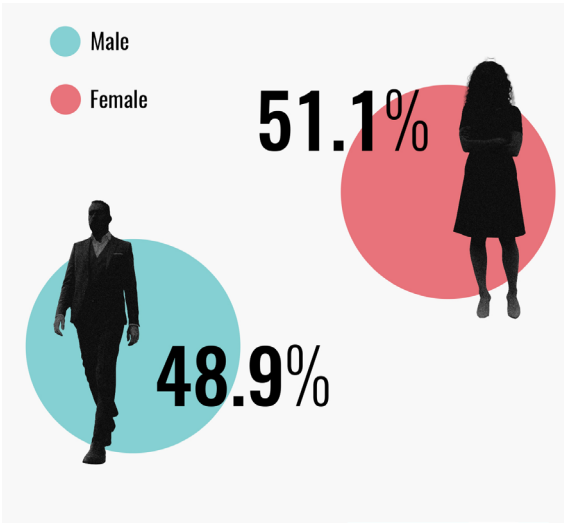
Figure 2: *Profile of respondents by age group*
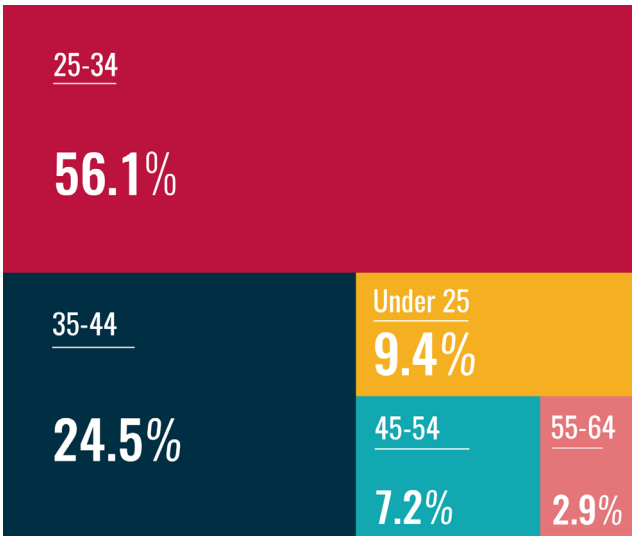
25-34
56.1%
35-44
24.5%
Under 25
9.4%
45-54
7.2%
55-64
2.9%

Professional roles within the surveyed group were also varied, with 70% identifying as reporters, 11% as editors-in-chief and 9% as editors. The remaining respondents held other roles within the media sector. When examining years of experience, the data showed that 0.7% of respondents had less than one year of experience while 8.6% had 1-3 years, 30% had 4-6 years, 25% had 7-10 years and 35.3% had over 10 years of professional experience, highlighting a balanced representation of new and seasoned media professionals.

Figure 3: *Profile of respondents by role*

1%	Multimedia producer
2%	Videographer
2%	Freelancer
2%	Digital producer
4%	Journalist
9%	Editor
11%	Editor in Chief
70%	Reporter
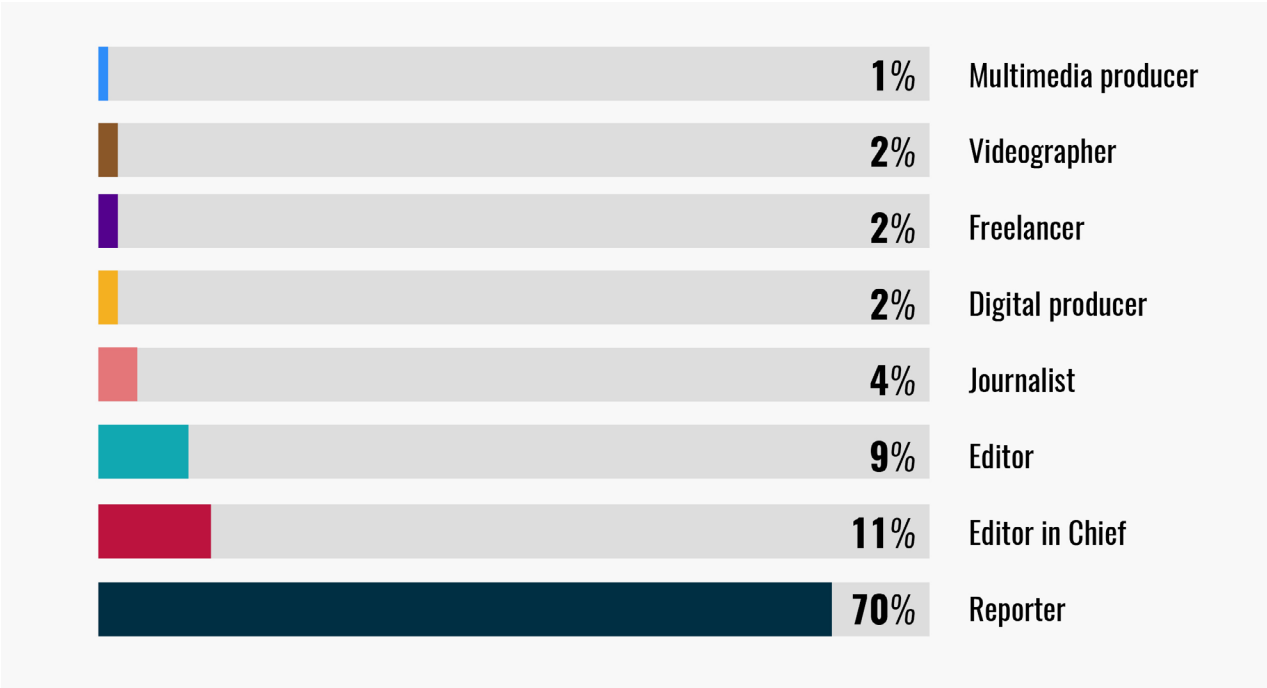
Figure 4: *Profile of respondents by experience in journalism*
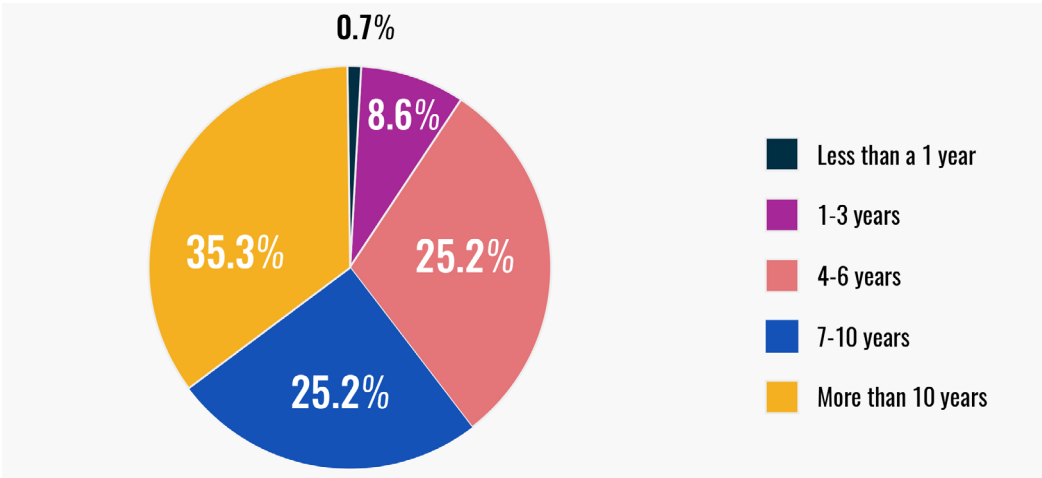
Most respondents (70.5%) reported working in television while 20.1% were employed in online media. A significant 85.6% worked in privately owned media outlets, reflecting the dominance of private entities in Albania's media landscape.

Figure 5: *Profile of respondents by type of media they work in*
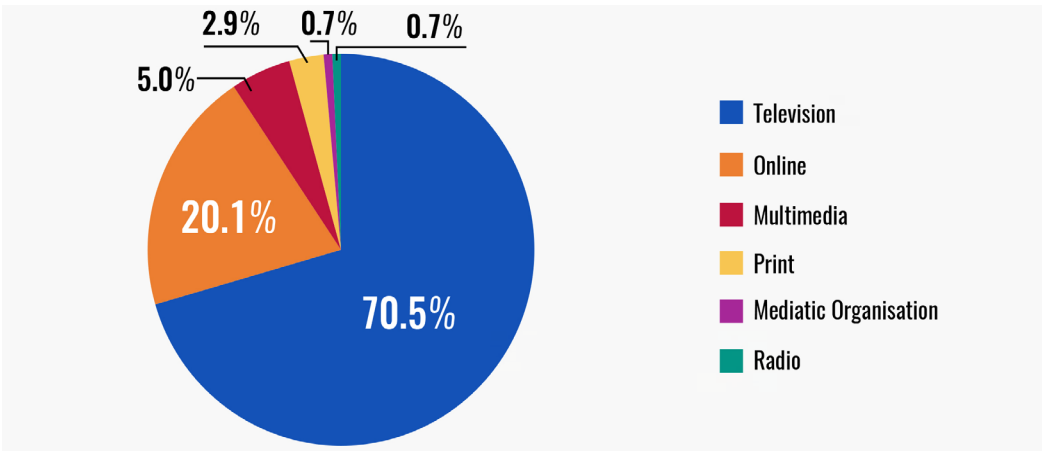
Figura 6: *Profile of respondents by financial type of media they work in*

PRIVATE MEDIA

NGO MEDIA

8.6%

85.6%

PUBLIC MEDIA

5.8%

More than two-thirds of the respondents hold a master's degree (72.7%), indicating that the sample had high academic qualifications.

Figure 7: *Profile of respondents by highest level of education*

0.7% 3.6%

23.0%

72.7%

- High school
- Bachelor degree
- Master degree
- Doctorate
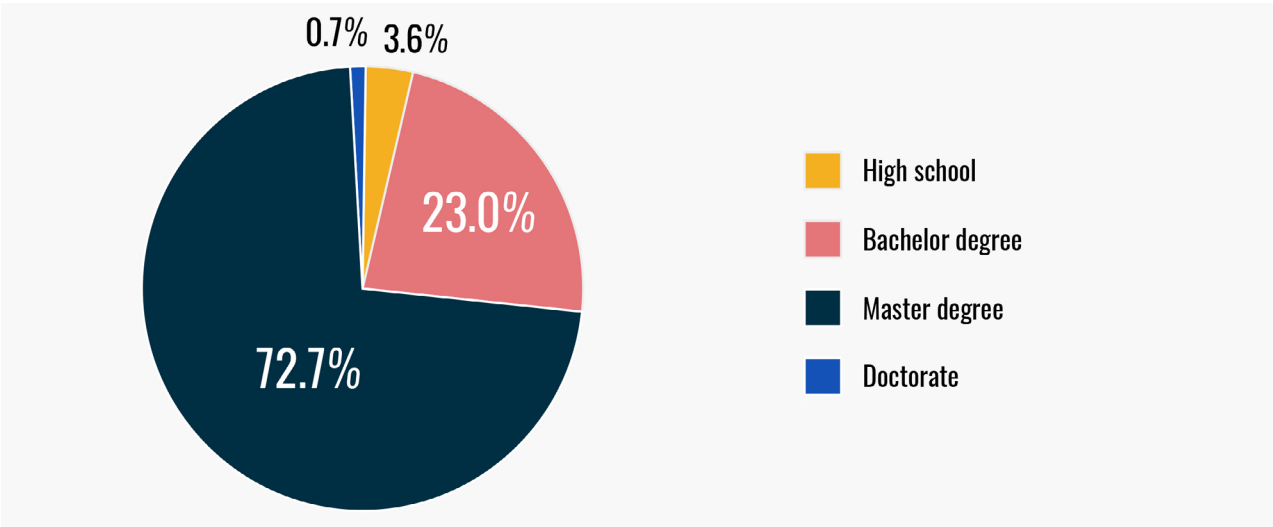
In terms of geographical distribution, most respondents were based in Tirana (72.7%) with others located in Elbasan (7.2%), Vlora (4.3%), Durrës (2.9%) and other districts. This geographical representation ensured that the findings captured both the urban and regional dynamics of the Albanian media environment.

Figure 8: *Profile of respondents by district where they work*

Fier **0.7**%
Lezha **2.2**%
Kukës **2.2**%
Dibër **2.2**%
Shkodra **2.9**%
Korça **2.9**%
Durrës **2.9**%
Vlora **4.3**%
Elbasan **7.2**%
Tirana **72.7**%
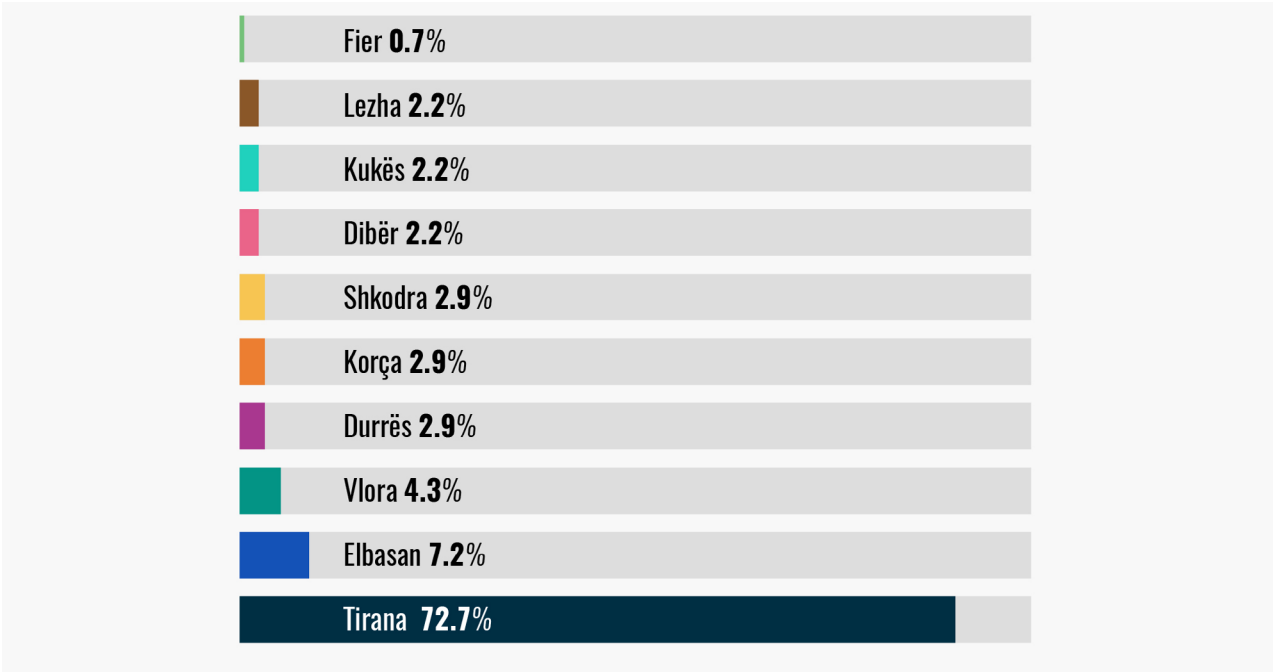
2.3. Qualitative methods

To complement the quantitative data, qualitative research methods were utilized. Semi-structured

interviews were conducted with 6 journalists, editors, and media researchers from July through October 2024. These interviews provided deeper insights into institutional, political and economic influences on media freedom and safety, helping to contextualize the survey findings and identify patterns not evident in quantitative data alone.

Table 1: *Interviews sample*

Gender	Role
Man	Journalist
Woman	Journalist
Woman	Journalist
Woman	Media Expert
Man	Legal Expert
Man	Digital Transformation Expert
Woman	Media Researcher
Woman	Editor
Man	Civil Society Representative
Woman	Civil Society Representative

Additionally, Freedom of Information (FOI) requests were submitted to 12 institutions to gather official data and documents on media regulation, transparency and incidents involving journalists' safety in October and November 2024.

Table 2: *FOI requests*

Institution	Request Description
Council of Ministers	Information on reforms and measures for media freedom, transparency, and journalist protection.
State Police	Data on cases related to journalists' safety and specific protocols for journalists' protection.
Audiovisual Media Authority	Reports on harmful content and transparency of online media ownership and funding.
Commissioner for the Right to Information and Protection of Personal Data	Complaints and measures regarding personal data protection and transparency for journalists.
Minister of State for Public Administration and Anti-Corruption	Data on legal actions and initiatives to combat misinformation and enhance transparency in media reforms.
Labour Inspectorate	Employment data and violations related to journalist working conditions, including compliance with the Labor Code.
Special Parliamentary Committee to Counter Foreign Interference and Disinformation in Democratic Processes	Information on measures to combat disinformation and protect democratic processes.
Parliamentary Committee on Education and Public Information Means	Reports and assessments of media reforms, safety of journalists, and collaboration with key public institutions.

Parliament of Albania	Data on collaboration and oversight of media-related reforms, disinformation, and safety initiatives.
General Prosecutor's Office	Data on reported threats, digital violence cases, and protocols for handling incidents involving journalists.
General Directorate of Taxation	Data on journalists' incomes, tax compliance of media organizations, and investigations into media-related violations.

2.4. Merits and limitations

The mixed-methods approach used in this report allowed for a rigorous assessment of Albania's progress in 2024 towards EU recommendations regarding media freedom and the safety of journalists. The combination of secondary resources, such as reports and documents, a survey of journalists, informative interviews with stakeholders and FOI requests to public institutions enabled the triangulation of findings, ensuring a nuanced understanding of structural challenges and individual experiences. The report is relevant to Albania's ongoing European accession process.

However, the report is not without limitations. The reliance on self-reported data from the survey may introduce biases based on perceived personal experiences. Additionally, while valuable, the FOI requests were limited by institutions' responsiveness and the quality of the information provided. Despite these constraints, the report offers a useful framework to monitor progress and identify actionable priorities for enhancing media freedom and journalists' safety.

3. MEDIA FREEDOM AND JOURNALISTIC SAFETY IN ALBANIA'S EU ACCESSION IN 2024

3.1. EU recommendations on media freedom and safety of journalists

A free and pluralistic media environment is indispensable for upholding the rule of law. An independent media plays a pivotal role in acting as a watchdog of democracy, ensuring accountability, and empowering citizens with the freedom to seek, receive and impart information. However, when the media is subjected to undue pressure or control from political or state actors, it significantly undermines both media freedom and democratic principles.

The EU has consistently emphasized the importance of media freedom in its progress reports on Albania over the last five years. The recommendations fall under four main categories, reflecting persistent areas of concern:

- **Ensuring Zero Tolerance for Intimidation**

A critical recommendation concerns the need to eliminate intimidation of journalists. Establishing a transparent and well-documented track record of judicial cases related to such incidents remains essential for creating a safer environment for media professionals.

- **Addressing Media Ownership Concentration and Transparency**

The EU has repeatedly highlighted the risks posed by the high concentration of media ownership in Albania. The lack of transparency in media funding further exacerbates these risks, leaving media outlets vulnerable to political and economic influence.

- **Improving Journalists' Working Conditions**

Strengthening the employment and social rights of journalists has been a recurring theme in EU recommendations. Ensuring consistent application of the labor code is critical to addressing precarious working conditions that often compromise journalistic independence.

- **Enhancing Self-Regulation within the Media Community**

The EU has advocated for stronger self-regulatory efforts among media organizations to promote ethical standards and professional accountability, fostering greater independence from external pressures.

Key concerns on media freedom have been voiced clearly in EU progress reports (see the table below). Access to information has always been a foundational element in getting the public informed and creating possibilities to dig deeper into affairs of public interest. Transparency in public advertising has also been a point of interest and a recommendation to enhance media impartiality and independence. Progress has been slow or moderate in general; despite re-wording, depending on the concrete cases of the year, most of these recommendations have yet to be wholly fulfilled.

Table 3: *EU recommendations on media freedom and safety of journalists 2021-2024*

2021[19]	2022[20]	2023[21]	2024[22]
Ensure a policy of zero tolerance for intimidation and attacks against journalists, as well as for threats against the media, including in political discourse and in the margins of demonstrations	Adopt a policy of zero tolerance for intimidation and attacks against journalists, as well as for threats against the media, including in political discourse and in the margins of demonstrations	Ensure zero tolerance for intimidation and effective judicial follow up in cases of attacks against journalists, including through full decriminalisation of defamation	Adopt amendments of legal framework to: (i) increase the transparency of media ownership, (ii) fully decriminalise defamation and align civil aspects of defamation with European standards, based on a structured and inclusive dialogue with media actors;
ensuring that the legal requirements for transparency of media ownership and financing, and its limitations thereto, as well as requirements on public advertising, are aligned to international standards.	Ensure that the legal requirements for transparency of media ownership and financing, and its limitations thereto, as well as requirements on public advertising, are aligned to international standards.	Address the high concentration in media ownership and significantly increase the transparency of media financing, including by revising legal requirements for public advertising, in line with European standards	Ensure zero tolerance for intimidation and effective judicial follow-up of cases attacks against journalists; ensure increased capacities of law enforcement bodies to handle cases of violence, including on the margins of protests, and other criminal cases involving journalists, notably by ensuring high human rights compliance in handling incidents involving journalists, through binding instructions, data collection and capacity building measures;
Ensure implementation of the Labour Code and strengthen the protection of Albanian journalists' labour and social rights.	Implement the Labour Code and strengthen the protection of Albanian journalists' employment and social rights	Improve the working conditions for journalists, in particular by strengthening the protection of Albanian journalists' employment and social rights and ensuring a consistent application of the labour code	Improve Albanian journalists' working conditions, in particular by strengthening the protection of journalists' employment and social rights and ensuring the labour code is consistently applied.

[19] Komisioni Evropian: Raporti i Shqipërisë 2021

[20] Komisioni Evropian: Raporti i Shqipërisë 2022

[21] Komisioni Evropian: Raporti i Shqipërisë 2023

[22] Komisioni Evropian: Raporti i Shqipërisë 2024

It is important to ensure the media's direct and transparent access to governmental institutions and their activities as well as to non-partisan public information	It is essential that any possible change to the media law should be in line with the Venice Commission Opinion and submitted to proper consultation with media organisations.	A solid track record of prosecution and judicial follow-up has yet to be established to safeguard the safety of journalists.	
	Albania still needs to introduce legislation to strengthen transparency in public advertising.	The systematic monitoring and transparent reporting of the judicial cases involving journalists and media professionals needs to be strengthened.	It is essential that any change to the legal framework be in line with European standards, including the Venice Commission opinions, and be subject to extensive consultations with media organisations and civil society based on a structured and inclusive dialogue.
	It remains important to ensure direct and transparent media access to governmental institutions and their activities and to factual non-partisan public information.	There is a need for a comprehensive assessment of the legal and regulatory framework to address major challenges hampering media independence, in particular concentration of media ownership and transparency of financing sources and economic interests, including public funding. It is essential that any change to the legal framework be in line with European standards, including the Venice Commission opinions, and is subject to extensive consultations with media organisations and civil society.	The Law on access to information is broadly aligned with European standards; however, shorter and binding deadlines for answers to journalists need to be set based on best European practices.

	Self-regulating activities need to be stepped up, in particular by the Alliance for the Ethical Journalism, a group that brings together stakeholders, including online ones, who pledge to comply with the Code of Ethics.	Implementation of the right of access to public information needs to be further strengthened.	Implementation of the right of access to public information needs to be further strengthened
		Self-regulation needs to be further strengthened and supported.	Self-regulation needs to be further strengthened and supported.

Furthermore, the European Commission's 2024 Rule of Law Report[23] on Albania highlights critical issues affecting media freedom and the safety of journalists. These include concerns about the independence of the audio-visual regulatory authority, which remains vulnerable to political influence, and the lack of transparency and high concentration of media ownership, which limit media pluralism. Additionally, the allocation of state advertising lacks clear and transparent criteria, often favouring media outlets aligned with the government, compromising editorial independence. The independence of the public broadcaster is also under scrutiny due to persistent political interference. Journalists face ongoing challenges, including verbal and physical attacks, smear campaigns and SLAPPs, creating a climate of fear and self-censorship that undermines independent, quality and investigative reporting and free expression. These issues highlight the need for systemic reforms to strengthen media independence and safeguard journalists in Albania.

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[23] European Commission Rule of Law Report 2024

3.2. Perceptions and experiences of journalists in the EU accession process of Albania in 2024

Albania's bid for EU membership presents a crucial opportunity to advance media freedom. The EU integration process, grounded in principles such as the rule of law and freedom of expression, provides a structured framework for enacting necessary reforms in Albania's media sector. This framework emphasizes transparency and accountability, which are key to addressing persistent challenges, such as media ownership transparency and concentration, political bias, access to information and the safety of journalists. Journalists' understanding and engagement in the EU accession process is key to providing factual, accurate reporting to citizens.

However, the survey data highlights uneven levels of engagement among journalists in Albania regarding the EU accession process. While 42% of journalists have participated in information sessions on EU integration, a significant 30.2% have not engaged in any activities. This lack of participation is particularly pronounced among those with 7–10 years of experience in journalism, reporters, and among individuals working in online media, suggesting a potential gap in outreach efforts towards these groups.

Figure 9: *Participating in the following information sessions or consultations*

	Male	Female	Total
Information sessions related to EU accession process for Albania	42.3%	41.2%	41.7%
Consultation for the legal changes in the Audiovisual Media Authority (AMA)	22.5%	19.1%	20.9%
Consultation on the European Union (EU) report for Albania	23.9%	13.2%	18.7%
Consultation on the Rule of Law Roadmap	8.5%	8.8%	8.6%
Consultations on the Broadcasting Code	5.6%	10.3%	7.9%
I have not participated	28.2%	32.4%	30.2%

The data reveals gendered patterns in participation and awareness. Male journalists are more likely to participate in consultations on the EU report (23.9% vs. 13.2% for females), whereas women journalists are more engaged in consultations on the Broadcasting Code (10.3% vs. 5.6% for males). Moreover, male journalists demonstrate higher awareness of how the EU integration process impacts journalist safety. Gendered differences suggest the need for tailored interventions to ensure both men and women have equal access to and benefit from information sessions and consultations. Addressing structural barriers that limit women's participation in certain areas could improve gender equity in media development initiatives.

When it comes to awareness of EU integration' contribution to journalists' safety, one-third of journalists remain unaware of how the EU integration process contributes to their safety. Among those who did not participate in consultations or sessions, 57.1% reported being unaware of these contributions. Moreover, younger journalists and reporters with less experience are less likely to perceive EU integration as having a positive impact. This lack of awareness is a critical barrier to building trust in the EU process. Targeted efforts to raise awareness through workshops, mentoring, and sector-specific campaigns could help to bridge this knowledge gap, particularly for early-career journalists and reporters.

Figure 10: *Awareness of EU integration's contribution to journalists' safety*

	Yes, I am well aware	Yes, I am somewhat aware	No, I am not aware
Total	33.8%	46.0%	20.1%
Female	33.8%	50.0%	16.2%
Male	33.8%	42.3%	23.9%
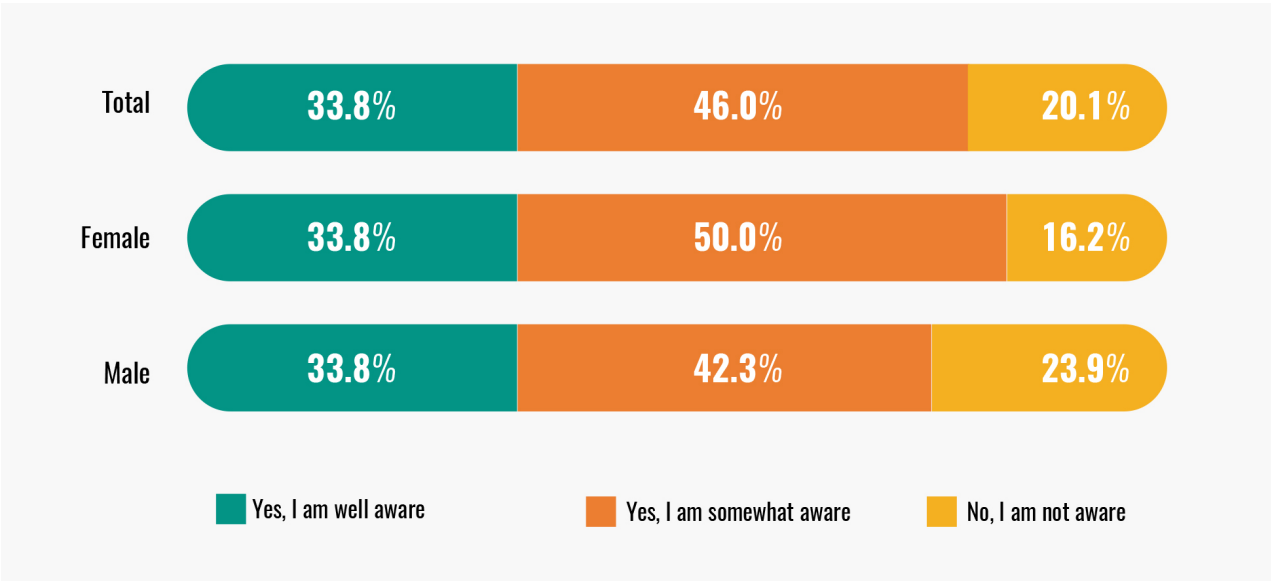
Approximately 38.9% of respondents perceive the EU integration process as having a positive impact on journalistic safety. While 6.5% see this impact as "significant", the majority describe it as "moderate". Male journalists are more likely to perceive the process positively than their female counterparts. The

perception of moderate impact underscores the need for more tangible results in terms of safety and reforms. Strengthening legal protections, ensuring transparent judiciary follow-ups, and promoting visible outcomes from EU-backed initiatives could reinforce trust and highlight the benefits of EU integration.

Figure 11: *Perceived Impact of EU Integration on Journalist Safety*

	No, a negative impact	No impact	Yes, a moderate positive impact	Yes, a significant positive impact
Total	3.6%	57.6%	32.4%	6.5%
Female	4.4%	58.8%	32.4%	4.4%
Male	2.8%	56.3%	32.4%	8.5%
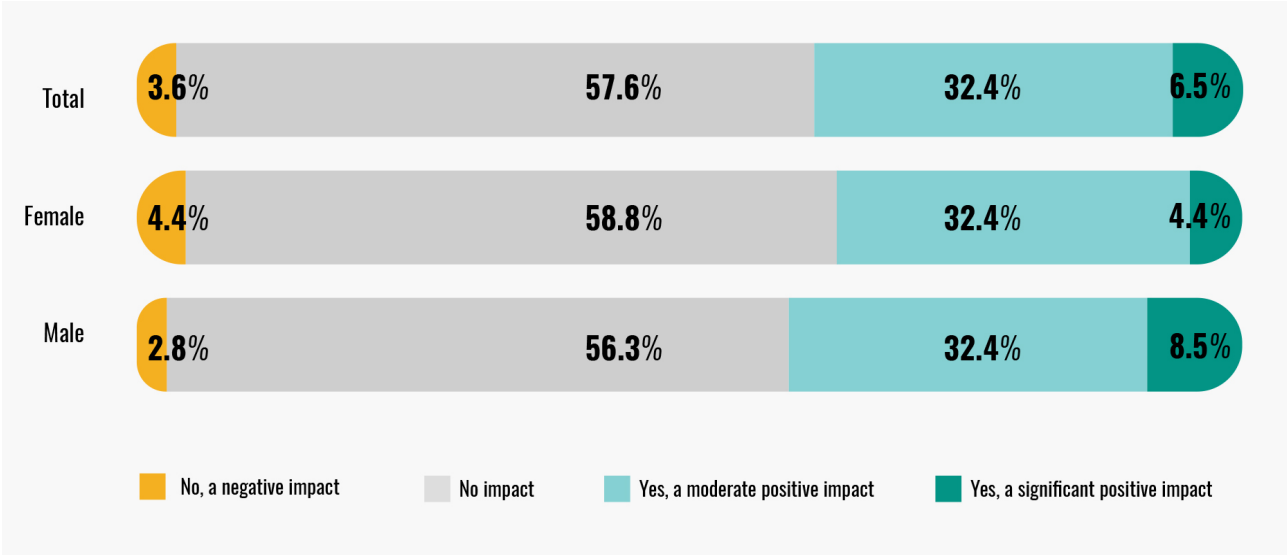
Half of the respondents are unaware of government-approved roadmaps affecting media freedom, with male journalists particularly lacking awareness. Interestingly, while male journalists seem to be more informed of how the EU integration process impacts journalists, they lack understanding of the concrete policy and regulatory steps the government takes towards it. This low level of knowledge hinders the ability of journalists to advocate for, or leverage, these roadmaps in their work. To increase the effectiveness of government policies, it is vital to disseminate information about these roadmaps widely and in accessible formats. Collaboration with media organizations and associations could ensure that journalists understand and engage with these frameworks.

Figure 12: *"Are you aware of the roadmaps approved by the Albanian government that affect media freedom?",* *by gender*

	No, I'm not aware	Yes, I am somewhat aware	Yes, I am well aware
Total	50.4%	33.8%	15.8%
Female	47.1%	39.7%	13.2%
Male	53.5%	28.2%	18.3%
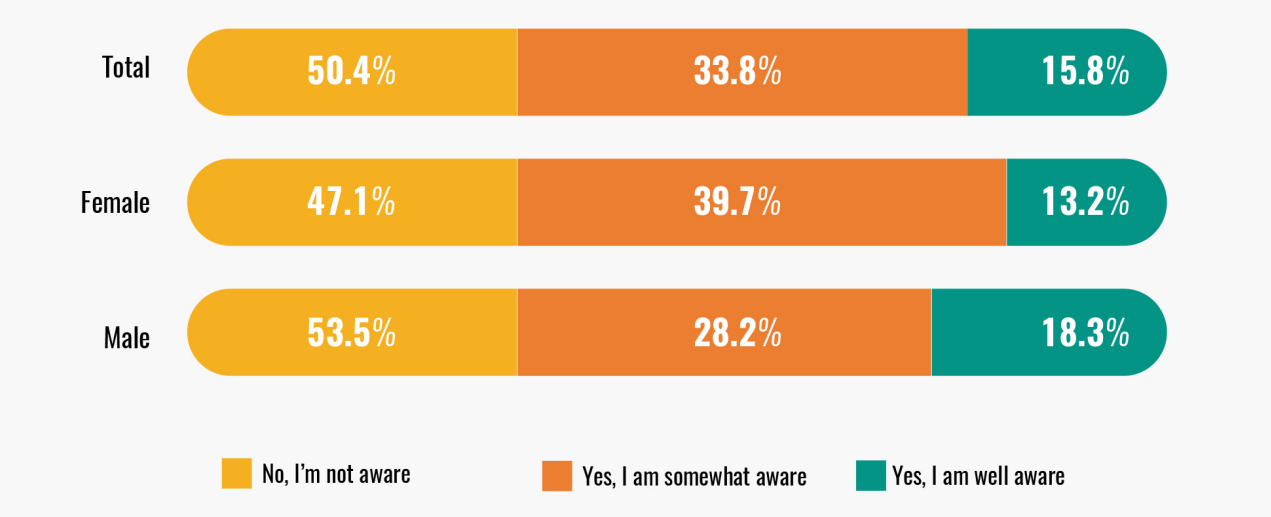
Journalists who did not participate in any consultations or sessions often work in private media (32.8%), online media (39.3%), or have roles as reporters (34%). These groups may face structural barriers, such as time constraints, lack of institutional support or insufficient resources. These findings highlight the need for targeted awareness campaigns, capacity-building initiatives and more inclusive consultations to maximize the benefits of EU integration in strengthening media freedom and journalist safety in Albania.

4. RULE OF LAW ROADMAP MEASURES – TRACING PROGRESS IN 2024

In response to the screening process[24] and as part of preparations for the opening of accession negotiations for Cluster 1, the Council of Ministers approved the Rule of Law Roadmap on December 13, 2023, through Decision No. 736.[25] This roadmap outlines specific measures aimed at addressing key challenges, including media ownership concentration, transparent audience measurement, structured dialogue for media freedom, the safety of journalists, working conditions and access to information. The data gathered for this report highlights the level of progress achieved in 2024 for each of the measures outlined in the Rule of Law Roadmap. It will be presented in the following sections, integrating data from document analysis, responses to FOI requests, survey responses and insights from informative interviews.

In October, Albania's parliament approved the Roadmap on the Functioning of Democratic Institutions,[26] which includes also specific measures on media and elections. The envisaged measures include:

- Legislative amendments to the Electoral Code through a wide cross-party consensus and political will, and an open inclusive consultation process, within 2026.
- Legal changes to strengthen the efficiency and independence of the audiovisual media regulator will be adopted in line with Council of Europe's standards and Venice Commission recommendations within 2026.
- Regulatory framework of the other bodies monitoring online media during elections will be approved beginning from 2026 onwards.
- Increased quantitative and qualitative monitoring and professionalism in media reporting during

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[24] Screening Process Report Albania 2023
[25] Rule of Law Roadmap
[26] Roadmap for the Functioning of Democratic Institutions

the campaign in each election cycle, as well as AMA capacities to conduct the monitoring in a proper manner, starting from the elections of 2025, through the implementation of the project for "Modernization of the monitoring studio" by the AMA.

- Capacities invested in targeting disinformation during the electoral processes in each election cycle, starting from the elections of 2025, including the relevant target groups.
- Continuous implementation of robust monitoring mechanisms by the CEC in collaboration with other related institutions, enabled by electoral code amendments, that scrutinize digital campaigns for misinformation, manipulation and foreign interference, by deploying advanced technologies for real-time analysis, collaborating with social media platforms to detect and counteract disinformation and fostering international cooperation to address cross-border threats.

This report does not assess progress in the implementation of the measures related to media and election as envisaged in the Roadmap for the Functioning of Democratic Institutions, given that the roadmap was only approved in October 2024. An evaluation of its implementation will be conducted in 2025 and incorporated in the 2025 edition of this report.

4.1. Media ownership concentration

The EU has repeatedly recommended amendments to Albania's legal framework to enhance transparency and address issues related to media ownership and financing.[27] These proposed amendments aim to tackle the high concentration of media ownership and improve transparency in media financing, including revising legal requirements for public advertising in line with European standards.

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[27] Recommendations in Annual Reports 2021, 2022, 2023, 2024 and Screening Report 2023 and Rule of Law Report 2024 (Refer to Table 3 in this document)

Specifically, legal provisions should be introduced to limit media ownership and audience reach, ensure media pluralism, strengthen transparency rules and establish enforcement mechanisms for investigating breaches of ownership regulations. Transparency in media financing and ownership, including the interests of owners in media and non-media sectors, should be prioritized. Additionally, clear rules governing the allocation of state advertising are necessary. To support tackling high media ownership concentration, the Rule of Law Roadmap includes the following measure: "The National Business Registration Center increases monitoring of the implementation of the Law on Beneficial Owners, adopted in 2020, with the aim of ensuring full transparency of the ultimate owners of media enterprises by 2025, focusing on media businesses in violation of legal requirements."[28] Evaluation of the implementation of this measure will be included in the 2025 edition of this report.

The AMA has taken regulatory steps to enhance the transparency of ownership structures and legal compliance through the adoption of the regulation "On the requirements and procedures for reviewing changes in ownership structure and transparency of ownership data of audiovisual media operators," as per Decision No. 40, dated April 26th, 2024. This act aligns to a certain extent with the Audiovisual Media Services Directive[29] and incorporates provisions from the European Media Freedom Act (EMFA), which aims to outline requirements and procedures for assessing changes in ownership and ensuring transparency of ownership-related information for Audiovisual Media Service Providers.[30] Additionally, the AMA may request cooperation or enter into mutual assistance with the Competition Authority for the purposes of information exchange, or for taking important measures to ensure the sustainable and effective implementation of this regulation.

Currently, besides legal regulation, the AMA has prepared and graphically presented on its website the

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[28] Rule of Law Roadmap

[29] This aligns only partially with AMSD because it has two main provisions on ownership: media outlets are required to provide detailed information about their ownership structure, including beneficial ownership, to ensure the public can identify who controls them (partially aligned); media companies must disclose any changes in ownership to national regulatory authorities (aligned)

[30] AMA Regulation, 2024

ownership structure declarations and the transparency[31] of companies/individuals licensed or authorized by the AMA, as well as the declaration of the beneficial owner of these entities engaged in audio and audiovisual activities in Albania. In a response to a FOI request, the AMA states that by publishing ownership structures on the website, it fulfils an obligation in the EU integration process. The publication of media ownership data on the AMA's website is a positive step toward transparency and aligns with EU integration requirements.[32] However, this information is already available in the National Business Registry and fails to address deeper issues, such as vested interests, conflicts of interest, and hidden influences of media owners or persons affiliated with them. Without expanding transparency to include these critical aspects and ensuring coverage of all media, this effort risks being superficial, offering limited value in tackling ownership concentration and promoting genuine media independence.

The AMA Board approved a strategic action plan (2024-2026)[33] outlining its goals for the next three years, focusing on administrative and institutional objectives. Among other things, it emphasised the need to follow procedural steps for enacting changes in the ownership structures and enhancing ownership transparency, in accordance with Law No. 97/2013 and EU Directive 2018/1808.

Even with a strategic plan and alignment with EU directives, challenges such as hidden ownership and vested interests, conflicts of interest, insufficient resources, resistance from powerful media owners and limited enforcement mechanisms undermine the AMA's efforts. The findings from the survey highlight the persistent challenges faced by journalists in Albania, many of which are tied to the implications of media concentration and ownership dynamics. While private ownership does not necessarily equate to undue influence on journalistic practices, the absence of clear regulatory or self-regulatory mechanisms, such as provisions limiting an owner's sway over editorial policy, hiring and firing decisions for editors-in-chief, and maintaining a strict separation between marketing and editorial operations, heightens the risk of

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[31] AMA Transparency of Media Ownership Subpage
[32] Article 8 of the Decision is not yet fully implemented in the transparency subpage of AMA
[33] AMA's Strategic Action Plan (2024-2026)

compromised editorial independence. This dominance raises concerns about editorial independence, as private owners often prioritize business or political interests over unbiased reporting.[34]

More than two-thirds of respondents reported experiencing restrictions on their ability to report freely, often fearing reprisals or censorship. This perception reflects the influence of vested interests and editorial control tied to media ownership, which inhibits investigative journalism and compromises the integrity of reporting.

Figure 13: *"In the past year, have you felt free to report on any topic without fear of reprisal or censorship?"*

Never: I consistently felt unable to report freely due to fear of reprisal or censorship.
5.0%

Always: I never encountered any fear of reprisal or censorship.
12.9%

Often: I generally felt free to report, but there were occasional concerns.
18.7%

Rarely: I frequently faced concerns about reprisal or censorship.
22.3%

Sometimes: I sometimes felt restricted or feared repercussions for certain topics.
41.0%

When analysing different categories, the data shows that male journalists, reporters and those working in television are more likely to have experienced limitations in their ability to report freely over the past

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[34] Media Ownership Monitor in Albania, 2023

year. This disparity highlights how ownership concentration in television amplifies pressures on journalists, limiting their ability to report freely and exacerbating fears of reprisal or censorship.

The most restricted topic was reporting on corruption, with 63.3% of respondents stating this was a sensitive or restricted issue, followed by organized crime (46%) and coverage of large corporations and economic malpractices (38.1%). Notable gender differences were observed in reports on grand corruption, with 72.1% of women respondents considering it a sensitive or restricted topic, compared to 54.9% of male respondents.

Figure 14: *Topics or areas that respondents felt were particularly sensitive or restricted over the past year, by gender*

Topic	Male	Female	Total
Reports on grand corruption	54.9%	72.1%	63.3%
Reports on organized crime	43.7%	48.5%	46.0%
Coverage of large corporations, economic malpractices	39.4%	36.8%	38.1%
Reports on abuses, discrimination, minority rights	11.3%	16.2%	13.7%
Climate change, pollution, resource management	12.7%	7.4%	10.1%
Gender issues, LGBTQ+ rights, immigration	7.0%	11.8%	9.4%
Coverage of religious groups, cultural practices	7.0%	7.4%	7.2%
None	14.1%	11.8%	12.9%

Multiple choice
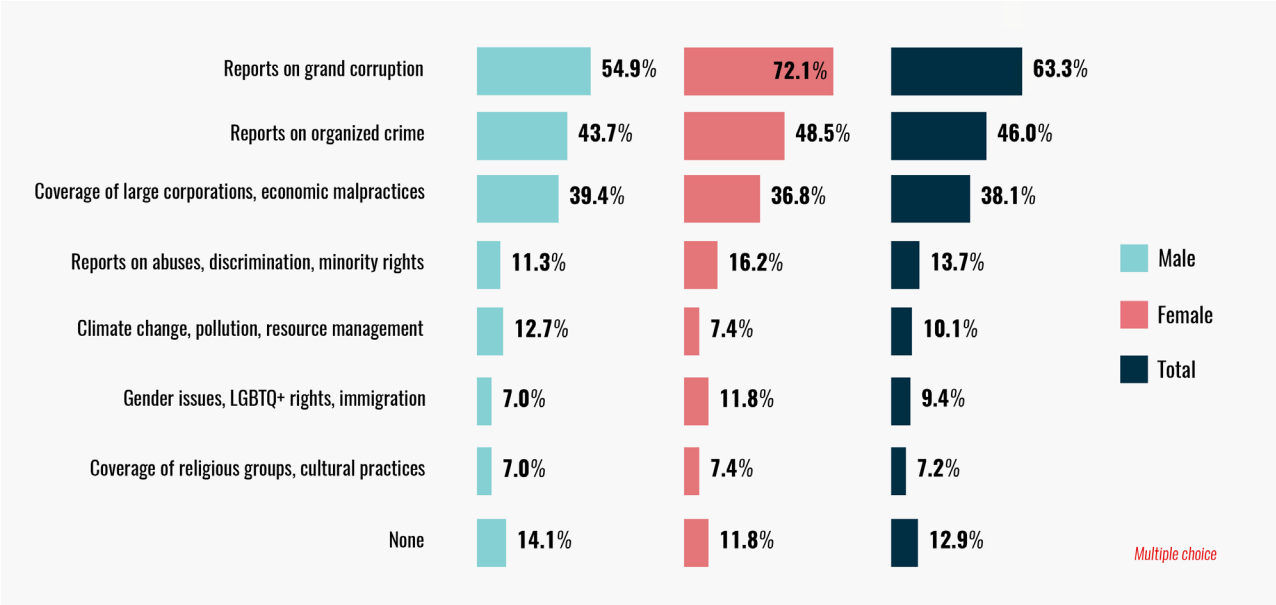
The fact that corruption (63.3%), organized crime (46%) and corporate malpractices (38.1%) are the most restricted topics demonstrates the critical role of ownership transparency in exposing hidden agendas. Concentrated ownership can perpetuate the suppression of these critical issues, furthering the need for reforms to address conflicts of interest and hidden influence. Only 12.9% of respondents indicated that they felt no restrictions on reporting over the past year.

When disaggregating by respondents' roles in journalism, it is evident that reporters and editors face more restrictions on various topics compared to other journalists (12% of reporters and 11% of editors reported no restrictions, versus 20% of other journalists). The greatest disparity is in reporting on organized crime, with 48% of reporters and editors citing restrictions, compared to 27% of other journalists. Online media journalists faced more restrictions on organized crime (54%) than television journalists (47%), while television journalists (42%) reported more restrictions on topics like "Coverage of large corporations and economic malpractices", compared to 32% of online journalists. Journalists working in NGO-funded media reported fewer restrictions than those in private or public media. However, these findings for NGO and public media should be interpreted cautiously because the data are only indicative and are statistically insignificant.

Figure 15: *Topics or areas that respondents felt were particularly sensitive or restricted over the past year, by media respondents' work and by their role (multiple choice)*

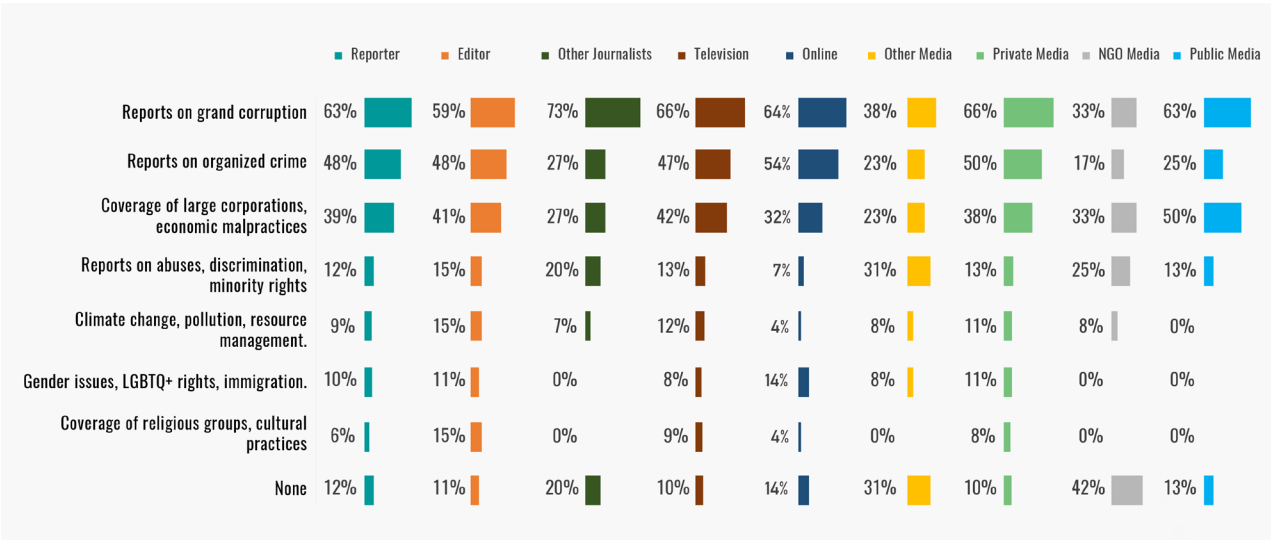|	Reporter	Editor	Other Journalists	Television	Online	Other Media	Private Media	NGO Media	Public Media
Reports on grand corruption	63%	59%	73%	66%	64%	38%	66%	33%	63%
Reports on organized crime	48%	48%	27%	47%	54%	23%	50%	17%	25%
Coverage of large corporations, economic malpractices	39%	41%	27%	42%	32%	23%	38%	33%	50%
Reports on abuses, discrimination, minority rights	12%	15%	20%	13%	7%	31%	13%	25%	13%
Climate change, pollution, resource management.	9%	15%	7%	12%	4%	8%	11%	8%	0%
Gender issues, LGBTQ+ rights, immigration.	10%	11%	0%	8%	14%	8%	11%	0%	0%
Coverage of religious groups, cultural practices	6%	15%	0%	9%	4%	0%	8%	0%	0%
None	12%	11%	20%	10%	14%	31%	10%	42%	13%

Only 17.3% of respondents reported that they never had to abandon or withhold a news report or story in the past year due to pressures, editorial decisions, censorship or self-censorship. Women journalists were more likely than male journalists to have had to abandon or not publish news stories; about 19% of women respondents frequently faced this issue, compared to about 10% of men.

Approximately 44% of respondents experienced pressure to modify, delay, or abandon a story due to external influences over the past year. This pressure was more pronounced among women than men (48.5% vs. 39.4%). Journalists employed in private media (47.9%) reported higher levels of pressure to alter, delay, or abandon stories compared to their counterparts in public media (37.5%) or NGO media (8.3%). Additionally, 46.9% of television journalists have felt this pressure, in contrast to 39.3% of online journalists and 30.8% of those working in other media sectors.

Figure 16: *Proportion of respondents that felt pressured to modify, delay, or abandon a story due to external influences, detailed disaggregation*

Category	Percentage
Total	43.9%
Male	39.4%
Female	48.5%
Less than 3 years	46.2%
4-6 years	38.1%
7-10 years	54.3%
More than 10 years	40.8%
Private Media	47.9%
NGO Media	8.3%
Public Media	37.5%
Reporter	42.3%
Editor	48.1%
Other Journalists	46.7%
Television	46.9%
Online	39.3%
Other Media	30.8%
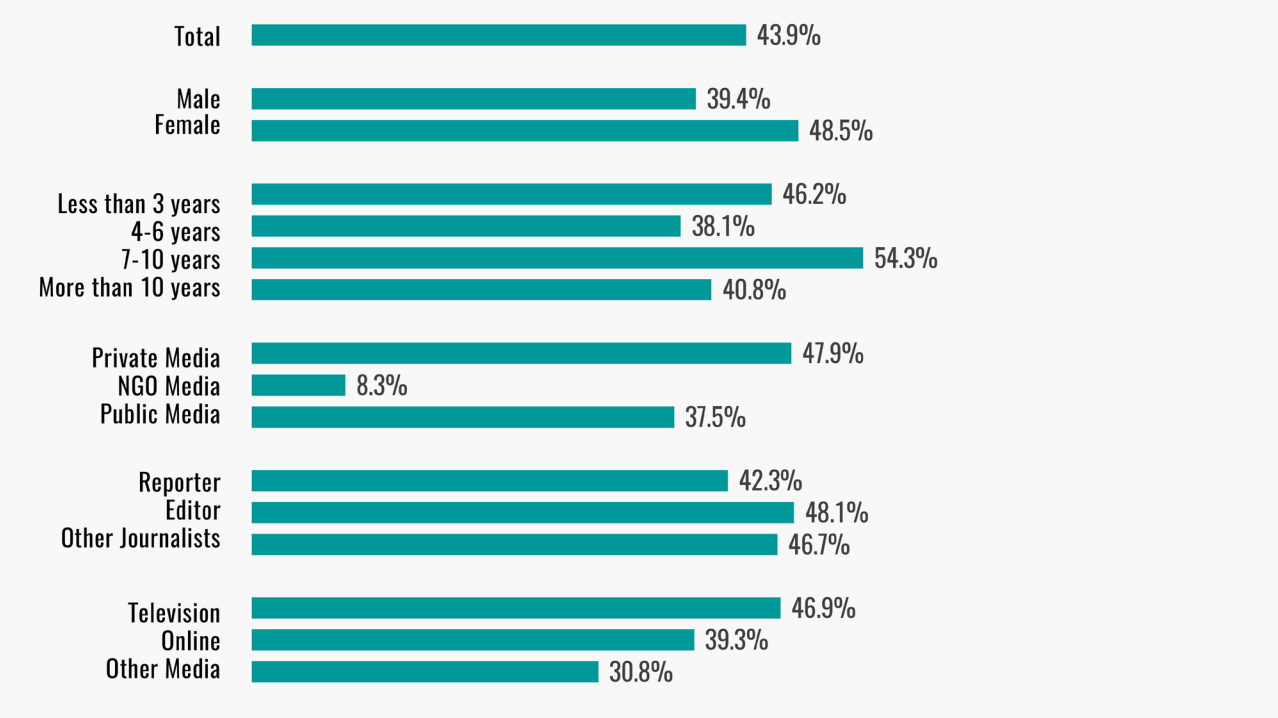
This pressure is often linked to ownership dynamics, where media owners or advertisers exert control over content to protect their interests, showcasing the detrimental impact of concentrated ownership on journalistic autonomy. Among journalists who have experienced pressure to modify, delay or abandon stories, 55.7% reported that this pressure came from their own media organization or superiors, 41% cited politicians or government officials, and 41% identified business interests or advertisers as sources of pressure.

Figure 17: *Where pressures experienced by Journalists to modify, delay, or abandon stories come from*

Pressure from your own media organization or superiors	55.7%
Pressure from politicians or government officials	41.0%
Pressure from business interests or advertisers	41.0%
Pressure from criminal organizations	14.8%
Pressure from relatives of the people involved	1.6%
Other	1.6%

Multiple choice
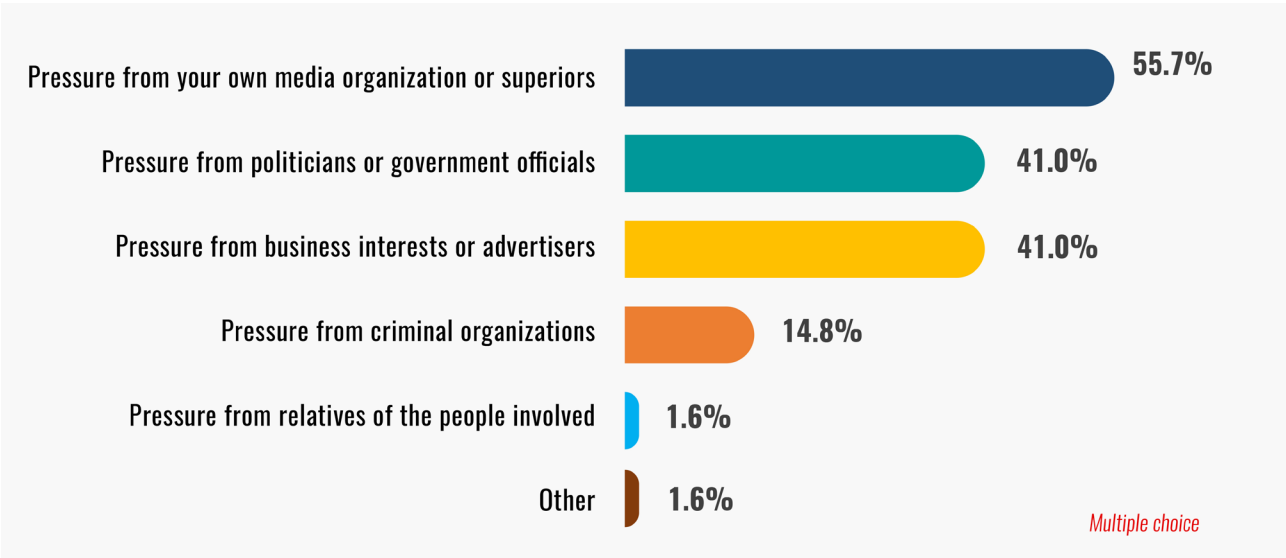
The breakdown of pressures reveals that political, economic and organizational interests are key sources of interference. Threats and intimidation, primarily from owners, advertisers and political actors, lead to widespread self-censorship among journalists. Among those who had experienced pressure, every respondent reported engaging in some form of self-censorship due to threats or intimidation, with nearly 20% admitting to practicing self-censorship, 13.7% reporting practicing self-censorship, and 6.6% of them doing so "to a very large extent". Ownership transparency is critical in mitigating these pressures, by revealing connections and allowing for greater accountability in editorial decision-making.

4.2. Transparent audience measurement

Albania currently lacks a transparent audience measurement system, a critical tool for ensuring accountability in public advertising. The EU has repeatedly emphasized the importance of transparency in public advertising to prevent favouritism and misuse of state resources, calling for objective and data-driven allocation mechanisms. As part of its Rule of Law Roadmap, Albania has committed to addressing this gap through measures such as: "the AMA supports broadcasters in ensuring a transparent audience measurement process by 2028 and continues to publish the annual Bulletin on media market dynamics within six months of each year. The AMA adopts a methodology and plan to establish and implement a transparent media audience measurement system by 2025."[35]

In 2023, the AMA began discussions with interest groups on proposed changes to the organic law, which include the concept of audience measurement. During these meetings, the AMA presented some models for audience measurement used by EU Member States that can be adapted to the dynamics of the audiovisual market in Albania.[36] The proposed changes include measures to introduce the concept of television piracy into law, and to prohibit it.[37]

For 2024, the AMA organised two roundtables based on audience measurements. It stated that *"implementing audience measurement is essential for the Albanian audiovisual market. It serves as an important tool for identifying the media influence of audiovisual media operators on the general public, such as the number of individuals reaching target viewership and the frequency of audiovisual programs watched. This measurement will also help to strengthen transparency in the audiovisual market and increase the variety of audiovisual services."*[38] Civil society or media organisations were not part of these roundtables, however.

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[35] Rule of Law Roadmap
[36] AMA, Annual Report 2023, p. 6
[37] AMA notification on piracy
[38] Response to FOI Request

For the audience measurement process, a structure has been established: the Joint Industry Committee (JIC), chosen by the Audiovisual Media Service Providers participating in the discussions organised by the AMA. It consists of nine members based on criteria established by the working groups with representatives from television operators.[39] The JIC includes three national private media (TV Klan, Top Channel, and Vizion Plus), RTSH Public Television, representatives from three regional television stations and two representatives from the association of advertising agencies.[40]

Since television plays a major role in reaching audiences, a transparent audience measurement system is crucial to ensuring fair public advertising practices. Without such a system, the allocation of advertising resources, including public funds, may disproportionately favor certain broadcasters, reinforcing issues of market concentration and undermining equitable competition.

4.3. Structured dialogue for media freedom

Another measure of the Roadmap is the establishment of a structured dialogue with the media in an inclusive manner, to facilitate discussions on key sector reforms, including the encouragement of self-regulation and quality education and training, but without specifying any public institution that can take responsibility and drive the process in its implementation.

At the 10th Media Development Forum,[41] EU Ambassador Silvio Gonzato announced a structured dialogue[42] to be facilitated by Professor Mark Marku, aimed at fostering trust and producing actionable reforms

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[39] AMA notification on the establishment of the Joint Industrial Committee for Audience Measurement, 2024
[40] Establishment of Joint Industrial Committee, 2024
[41] 10th Media Development Forum
[42] Speech of EU Ambassador, 10th Media Development Forum of the OSCE Presence in Albania, October 2024

through a collaborative approach with the Council of Europe.[43]

In his announcement, Gonzato underlined the sensitive nature of media reforms and the need for an extensive, meaningful consultation: *"Clearly media reforms are always very sensitive and need to be prepared, in particular through a wide and meaningful consultation of the relevant stakeholders, including civil society. This is why the EU supports the idea of a structured dialogue involving the state authorities and all relevant actors of the media sector ... In our view, this dialogue should have as a goal not only to build trust among all actors but it should eventually come up with concrete proposals for the government and the Parliament on how Albania can meet its EU-related commitments in the field of media freedom and freedom of expression."*[44]

This announcement indicates a significant reliance on international support and academic facilitation for the structured dialogue. Although state authorities are mentioned as potential participants, the practical responsibility for initiating and steering the dialogue, in reality, appears to rest outside the government's purview.

In response to a FOI request, the Minister for Public Administration and Anti-Corruption clarified the government's stance, stating: *"Based on the findings of the European Commission (EC) regarding media freedom and pluralism, the Albanian Government fully endorses the need to establish a structured and inclusive dialogue with the media sector, firmly believing that any dialogue platform for reforming the sector in line with EC recommendations serves to foster essential discussions on media self-regulation, guarantee journalists' rights, and promote professionalism in the sector".*[45]

In the same response it is argued that implementation of these commitments, as set out in the 2023–2030 Rule of Law Roadmap, will be continuously monitored by the Ministry of Justice as the institution

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[43] Statement of SCiDEV on the announced media structured dialogue, October 2024
[44] Speech of EU Ambassador, 10th Media Development Forum of the OSCE Presence in Albania, October 2024
[45] Response to FOI by the Minister for Public Administration and Anti-corruption, October 2024

responsible for Chapter 23, which covers freedom of expression and fundamental rights, including the rights of journalists and media-sector professionals. In the same vein, the Ministry of Justice will also be responsible for monitoring implementation of commitments related to the functioning of the media sector as prescribed in the Roadmap for the Functioning of Democratic Institutions.[46]

It was anticipated that the government would officially announce and lead the structured dialogue. But while the government publicly endorses the dialogue and tasks the Ministry of Justice with monitoring obligations, there is no unequivocal indication that a specific government institution has taken proactive leadership of the initiative. Monitoring alone is not synonymous with ownership or with driving the reform process so as then to take responsibility for the outcomes. Hence, the measure, although nominally in motion, remains unfulfilled, as the dialogue is instead being facilitated by academia and an international organization, with no direct involvement or accountability from any government institution.

Following the announcement by the EU ambassador of the initiative on the structured dialogue, during November and December 2024 there were no significant developments in this regard. The first presentation meeting of the structured dialogue was held in January 2025.

Interviews with key stakeholders suggest that the success of this initiative hinges on clear political commitment from both the government and parliament, even though the initiative is facilitated by academia and international organisation. Evidence-informed, transparent and timely decision-making, guided by European standards and recommendations, such as the Venice Commission's opinions, will be critical. Stakeholders further stress the importance of a clear methodology and timeline for the dialogue to ensure credibility and efficiency. Additionally, it is imperative for this dialogue to incorporate active involvement from both state actors, such as regulatory institutions and the legislature, and non-state actors, including independent media outlets, civil society organizations and academia.[47] The inclusion of

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[46] Ibid

[47] Interview with civil society representative, Tirana, November 2024

diverse perspectives will ensure that reforms are comprehensive and address critical challenges, such as ownership concentration, media financing transparency and journalists' safety. Drawing lessons from similar EU initiatives in other countries, the structured dialogue must maintain momentum through regular consultations and measurable milestones to build trust and achieve sustainable reforms.[48]

Others have expressed concerns that the structured dialogue risks becoming a 'box-ticking' exercise by the government, aimed solely at meeting EU benchmarks without a genuine commitment to improving the media environment.[49] Critics argue that without clear accountability mechanisms, substantive follow-through and genuine political will, the dialogue could fail to address systemic issues in the sector, such as ownership concentration, political interference and the lack of protections for journalists.[50]

Another related measure in the Roadmap focuses on the Media and Information Agency (MIA), calling for an independent evaluation of the agency, particularly regarding the transparency of information dissemination from government institutions.[51] No such evaluation appears to have been conducted to date.[52] This lack of oversight is particularly concerning given that the MIA operates under the authority of the Prime Minister, reconfirming longstanding concerns about its role in centralizing control over public information and potentially adding another layer of opacity to the flow of information.[53]

The negotiation position for Albania under Cluster 6, though not publicly disclosed, outlines the MIA's envisioned role as a Coordinating Body at governmental level to combat foreign information manipulation and interference.[54] This role includes verifying information sources, ensuring the accuracy of media

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[48] Interview with media expert, Tirana, October, 2024

[49] Interview with journalist, woman, Tirana, October, 2024

[50] Interview with journalist, woman, Tirana, October, 2024

[51] Rule of Law Roadmap

[52] MIA did not respond to FOI Request

[53] IPI Article, 2022 and Reporter.al, 2024

[54] Interview with civil society representative, Tirana, December 2024

content and collaborating with fact-checking organizations and the Public Diplomacy Department within the Ministry for Europe and Foreign Affairs. The fact that this expanded role for the MIA is outlined in Albania's negotiation position but has not been made transparent or subjected to public consultation amplifies concerns about the agency's accountability and its potential impact on media freedom[55], as well as rendering the above-mentioned measure obsolete, by further expanding the reach of its activities without a proper transparent process in place and evaluation of its impact on information dissemination.

Additionally, while there is an ad hoc parliamentary committee on countering foreign interference and disinformation[56], the MIA has not been part of the institutions that have reported to parliament, and its role has not been formally envisioned within the committee's framework. This raises questions of coherence and accountability. Without alignment between the government's vision for the MIA and parliamentary oversight, trust in the agency's operations and its ability to contribute to transparent and coordinated anti-disinformation efforts remains at risk, further exacerbating fears of centralized control over public information.[57]

4.4. Safety of journalists

Journalists in Albania face increasing threats, pressures and intimidation from both state and non-state actors. Physical attacks are not systemic in Albania. But monitoring reports and analyses have highlighted a persistent atmosphere of intimidation, smear campaigns and pressures, including lawsuits, with little improvement in protection of press freedom. Figure 18, below, highlights the increase in reported violations

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[55] Interview with civil media expert, Tirana, December 2024

[56] More on the Ad Hoc Committee sub-page

[57] Interview with civil society representative, Tirana, December 2024

of journalists' safety in Albania from 2020 to 2024 as reported by the SafeJournalists Network,[58] with a particularly rise in 2024, reaching 45 cases, related primarily to verbal attacks and anti-media discourse from political actors across the spectrum. It should be noted that this increase also reflects more systematic monitoring and alert-raising efforts, as well as a growing willingness among journalists to report incidents when they are attacked.

Figure 18: *SafeJournalists Network - Cases of attacks against journalists and media organisations 2020-2024*

Key types of violations include non-physical threats, such as verbal harassment and intimidation, which create a climate of self-censorship and sometimes fear. Digital attacks, including hacking, phishing and online harassment, further exacerbate these challenges, while anti-media language and hate speech, often

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[58] More here

from public figures, contribute to the stigmatization of journalists. Smear campaigns aimed at discrediting journalists and their work undermine their professional integrity, while intimidation tactics are used to silence critical reporting. Additionally, there were 43 lawsuits, recorded by October 2024,[59] highlighting the use of legal mechanisms to pressure and deter journalists.

Given the lack of significant improvements in 2024 to journalists' safety, the following subsections provides an overview of the perceptions of journalists about their safety. The last subsection explores the progress made towards the Roadmap's provisions regarding journalists' safety.

4.4.1.   Overall perceptions of safety

The survey data underscores a troubling trend of a perceived deterioration in. the safety of journalists in Albania. When respondents were asked about changes in the safety of journalism compared to the previous year, a majority (54.6%) reported a decline, with 30.9% reporting a "Significant Decline" and 23.7% a "Moderate Decline". Only 12.3% noted an improvement, with including 9.4% identifying a "Moderate Improvement" and 2.9% a "Significant Improvement". Perceptions of freedom of expression were even more negative, with 61.2% of journalists observing a decline (43.2% "Significant Decline" and 18% "Moderate Decline"). Just 9.9% saw improvements (7.2% "Moderate Improvement" and 2.9% "Significant Improvement").

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[59] As per the online system of Tirana District Court and FOI response, 30th October 2024

Figure 19: *Improvement of safety of journalism, working conditions, and freedom of expression compared to the previous year*
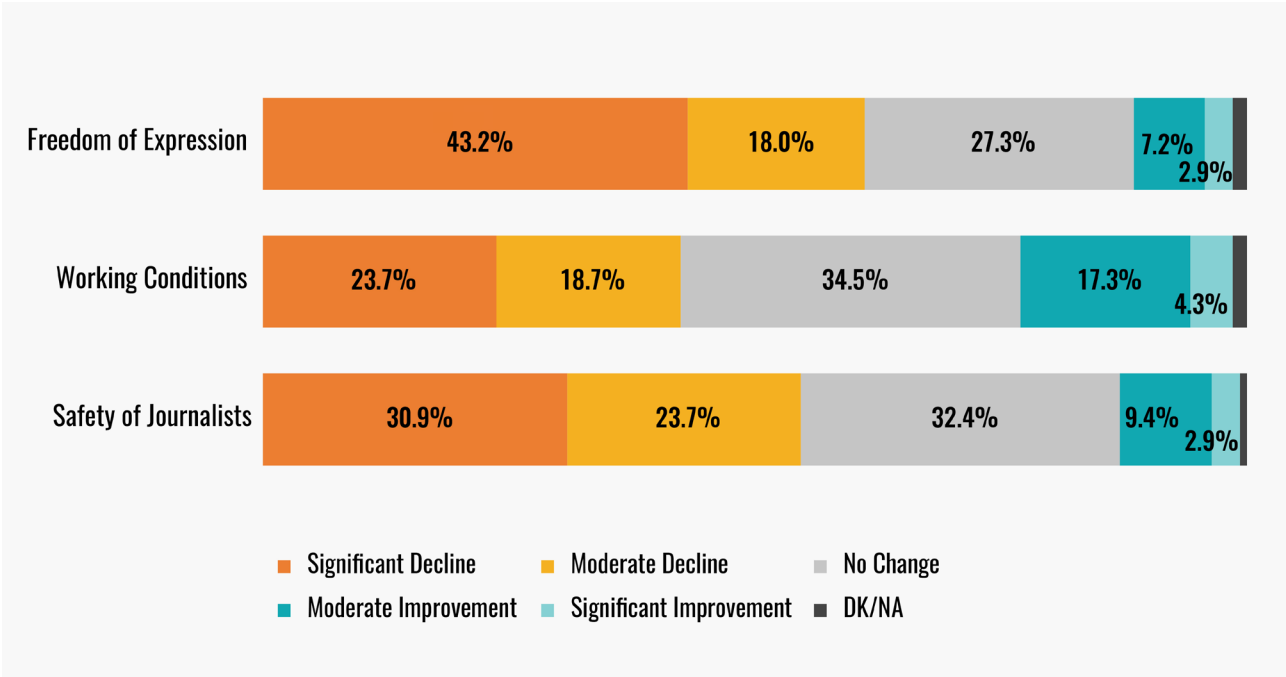
Freedom of expression emerges as the most severely impacted area, reflecting heightened constraints on journalistic independence and public discourse. The significant decline in safety and working conditions further highlights systemic challenges that impede the ability of journalists to operate effectively and securely.

When analysing perceptions based on respondents' roles in journalism, significant differences emerge. Editors are more likely than reporters or other journalists to perceive a decline in safety compared to the previous year. Overall, both editors and reporters consistently report a more negative outlook regarding

safety, working conditions and freedom of expression compared to their counterparts in other roles. This can be explained by the direct contact and dependence that editors have with owners or editors-in-chief who steer editorial processes within the newsroom.

Additionally, experience in the field plays a critical role in shaping perceptions. Journalists with less than three years of experience are more likely to believe that safety, working conditions, and freedom of expression have deteriorated over the past year compared to those with more extensive experience in journalism. This disparity may reflect the heightened vulnerability of early-career journalists to challenges in the media environment, such as precarious working conditions and lack of institutional support. Moreover, it can be argued that the challenging media environment has become normal for more experienced and seasoned journalists, which in turn leads to fewer of them taking a public and official stance when they are subject to different forms of violence.

4.4.2.   Experiences with safety and threats

Approximately 11.5% of respondents reported being physically attacked or assaulted at least once while working as a journalist in Albania. Out of all respondents, approximately twice as many men (15.5%) than women (7.4%) experienced such incidents. As expected, journalists with more years of experience were more likely to face physical attacks. All those who reported such experiences worked in private media, with none from NGO or public media. Additionally, all the affected journalists were reporters, with 14.3% working in television, compared to 3.6% in online media and 7.7% in other media outlets.

Figure 20: *Proportion of respondents that have been physically attacked or assaulted while working as a journalist in Albania, disaggregation*
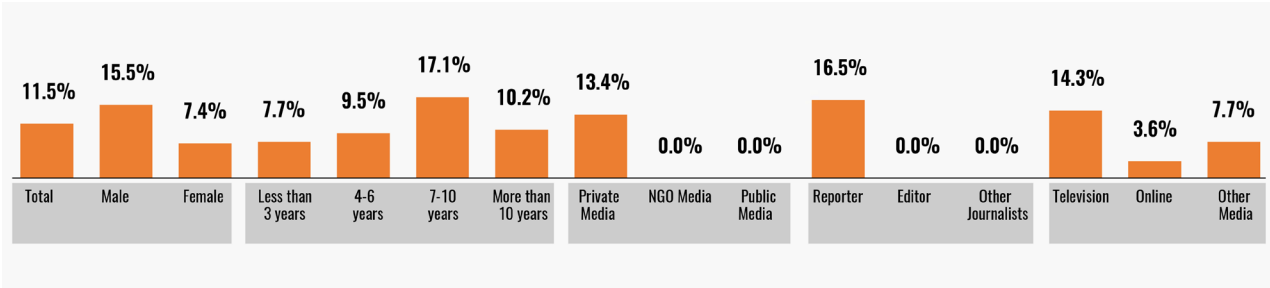
Among journalists who have been physically attacked or assaulted, 63% reported experiencing a physical assault, 11% faced vandalism or property destruction, and another 11% experienced attempted abduction or kidnapping. Additionally, 5% reported experiencing offenses, 5% were attacked with a weapon, and 5% had their family members or next of kin targeted.

Figure 21: *The nature of the attack or assault (Only those that have been attacked)*
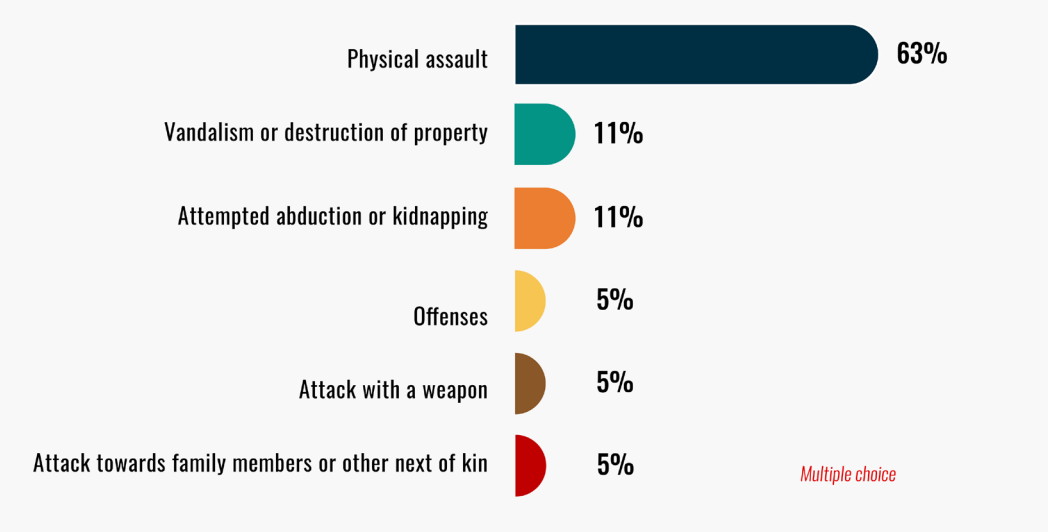
In 36% of cases of attacks, respondents state that the attack or assault did not impact their reporting. However, in 23% of cases they said attacks altered their way of reporting on certain topics. In 18% of cases reported they experienced increased anxiety or fear while reporting, while in 14% of cases they avoided certain topics or stories. Respondents stated that in 5% of cases they sought support or counselling. In another 5% they took additional safety precautions.

Figure 22: *Did the attack or assault affect your reporting, and if so, how? (Only those that have been attacked)*

Nearly half of the respondents (45.3%) said they had encountered threats or intimidation related to their work as journalists. A breakdown by gender reveals that a higher proportion of males (52.1%) reported experiencing such threats or intimidation compared to females (38.2%).

Figure 23: *Proportion of respondents that have experienced threats or intimidation related to their work as a journalist, by gender*
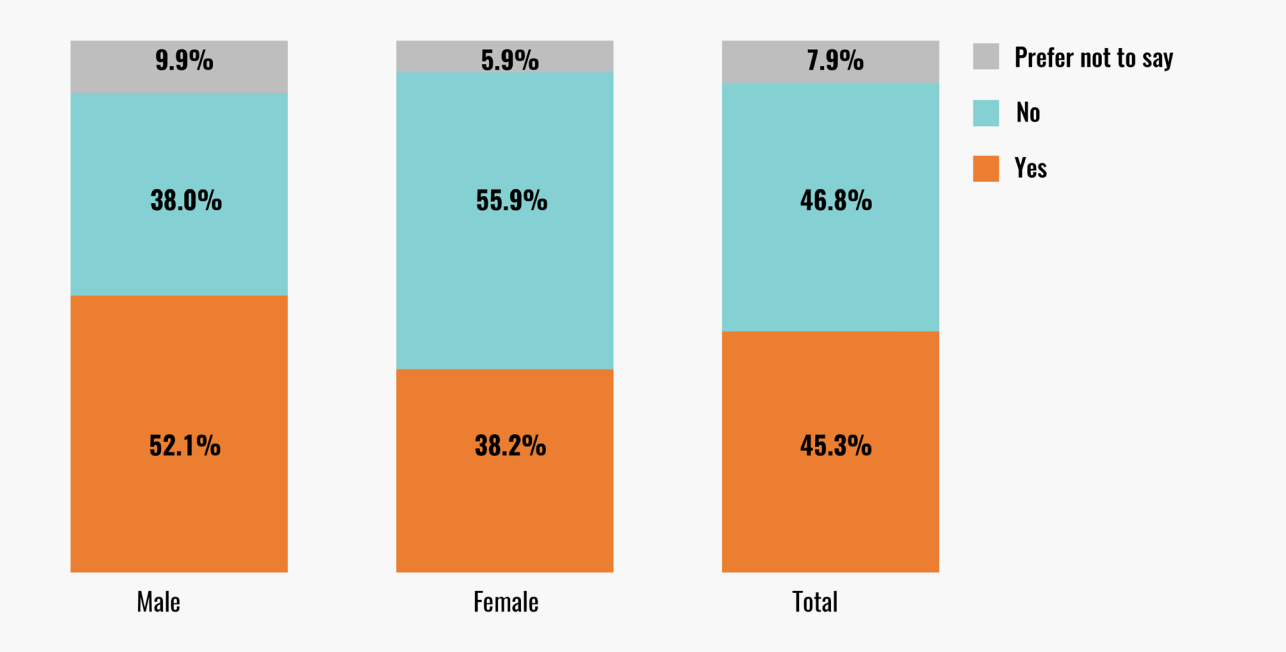
When analysing the differences in the proportion of journalists who have faced threats or intimidation related to their work, there are no significant variations based on years of experience. However, a higher percentage of journalists in public media (62.5%) reported such experiences compared to those in private media (44.5%) or NGO media (41.7%). Reporters (52%) reported facing threats or intimidation more frequently than editors (33.3%) or other journalists (33.3%). Additionally, journalists working in television are more likely to encounter threats or intimidation compared to those working online.

Figure 24: *Proportion of respondents that have experienced threats or intimidation related to their work as a journalist, detailed disaggregation*
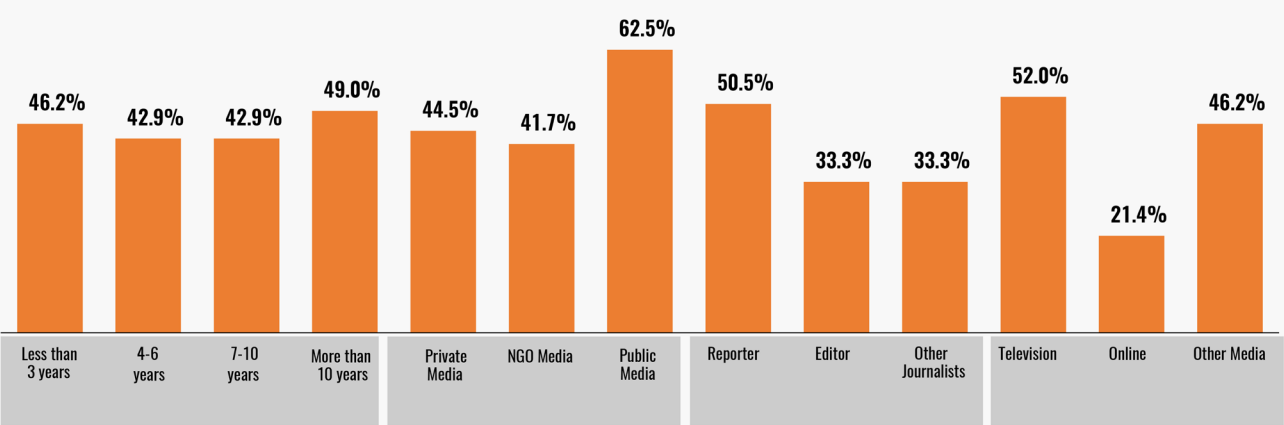
Among the journalists who have encountered threats or intimidation, approximately 89% faced verbal threats, 55.6% experienced online harassment, 28.6% were subjected to economic pressures and 7.9% faced legal threats. When disaggregated by gender, there are no significant differences in the types of threats or intimidation experienced. When respondents were asked to provide details, they mentioned receiving threatening calls to prevent the publication of certain topics, direct threats against themselves or their families, threats of dismissal from their jobs, etc.

Figure 25: *Type of threats or intimidation faced (only those that have faced them) by gender*

	Total	Male	Female
Verbal threats	88.9%	91.9%	84.6%
Online harassment	55.6%	51.4%	61.5%
Economic pressure	28.6%	27.0%	30.8%
Legal threats	7.9%	10.8%	3.8%

Multiple choice
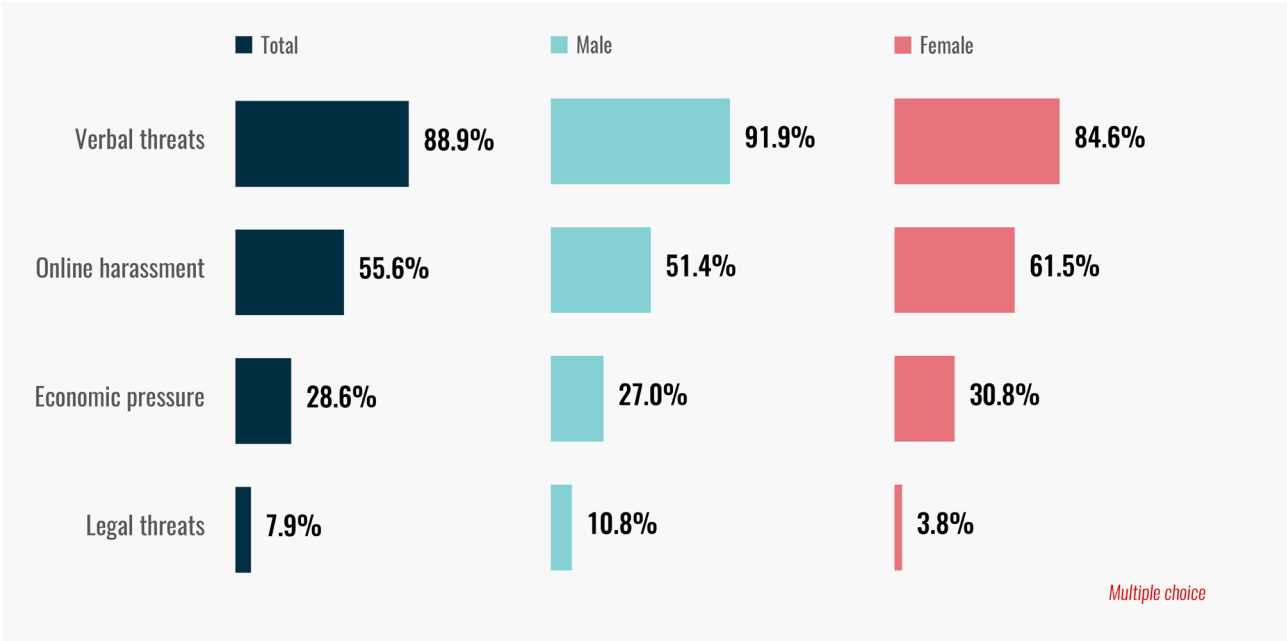
When examining the frequency of threats or intimidation, 14.3% of respondents who experienced such incidents reported facing them frequently or very frequently. Among those who encountered threats or intimidation, women reported experiencing these situations more frequently compared to men, although overall they face fewer cases of intimidation and threats compared to their male colleagues, as per the survey data.

Figure 26: *Frequency of threats or intimidation experienced by gender (only those who have experienced them)*
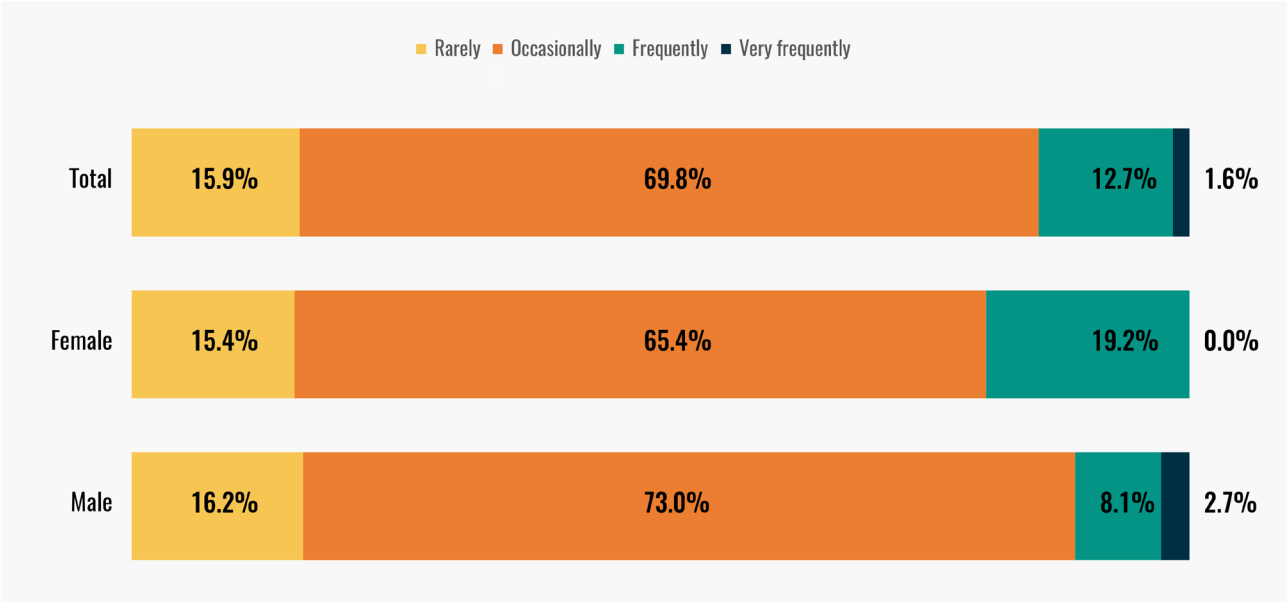
Journalists reported government officials as the primary source of threats or intimidation over the past year, with 49.2% of journalists experiencing such actions from them. This was followed by threats from corporate entities and criminal organizations (both at 28.6%), political groups (20.6%), and media owners (20.6%).

Figure 27: *Main sources of threats or intimidation (only respondents who have experienced them)*

Source	Percentage
Government officials	49.2%
Corporate entities	28.6%
Criminal organizations	28.6%
Political groups	20.6%
Media owner	20.6%
Relatives of the people involved	6.3%
Colleagues	4.8%
Advertisers	3.2%
DN/NA	6.3%

Multiple choice
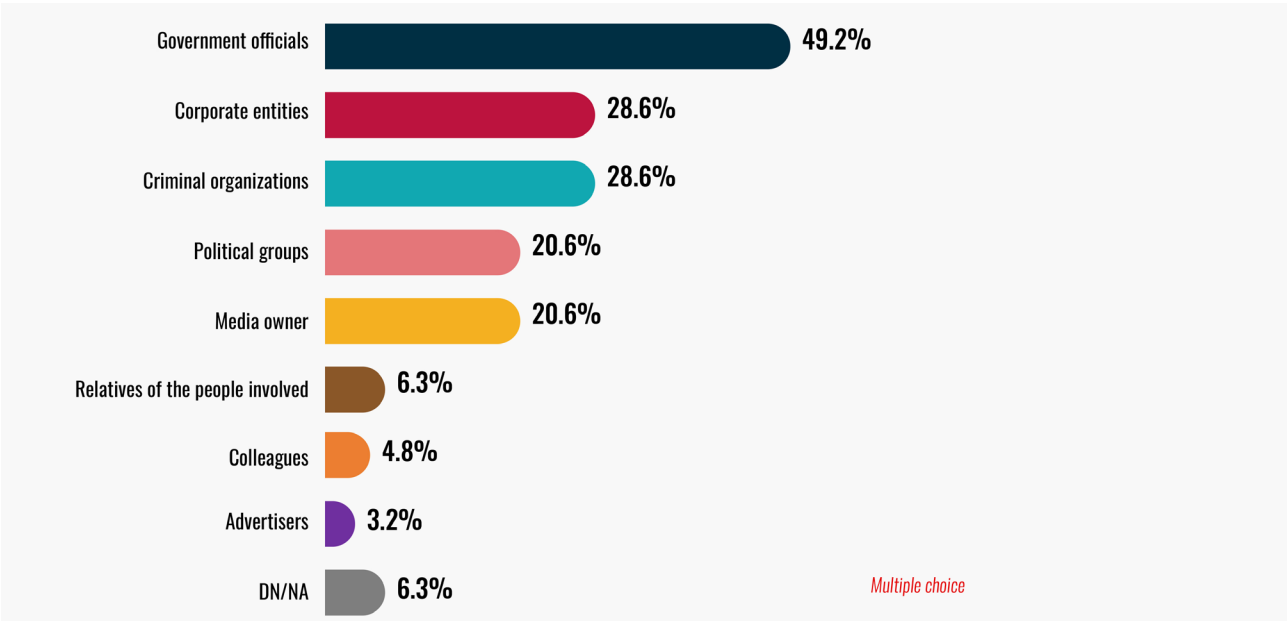
These findings reveal systemic vulnerabilities and gaps in the protection of journalists in Albania. The high prevalence of physical attacks, threats, and intimidation – particularly among reporters and television journalists – indicates an urgent need for robust safety mechanisms and legal protections. The complete absence of reported attacks in NGO media may suggest better safety protocols or support systems, raising questions about the inadequate protections in private media, where most attacks occur. It can also be argued that in private media, the environment as such creates space for such threats, with media owners themselves exerting pressure on journalist.

The chilling effect on journalistic freedom, demonstrated by altered reporting practices and topic avoidance, highlights the challenges facing journalism in the public interest. These changes undermine investigative journalism, particularly on sensitive topics such as corruption and organized crime. There is an emerging risk of normalising verbal attacks, antimedia language and intimidation, which, coupled with the lack of

institutional accountability, signals a systemic failure to safeguard journalists' fundamental rights and uphold freedom of the media in the public interest.

4.4.3.   Safety of women journalists

Approximately 20.6% of women journalists in Albania have encountered gender-specific threats or intimidation related to their work, reflecting a troubling reality for women in the media industry. Among those who have faced such threats, verbal harassment was the most common type (71.4%), followed by online harassment or abuse (35.7%), physical threats or harassment (21.4%), and sexual harassment (14.3%). These findings highlight the multifaceted nature of gender-based intimidation in journalism.

Figure 28: *Type of gender-specific threats or intimidation that females have faced (only those who have faced them)*

Sexual harassment 14.3%
Physical threats or harassment 21.4%
Online harassment or abuse 35.7%
Verbal harassment 71.4%

Multiple choice
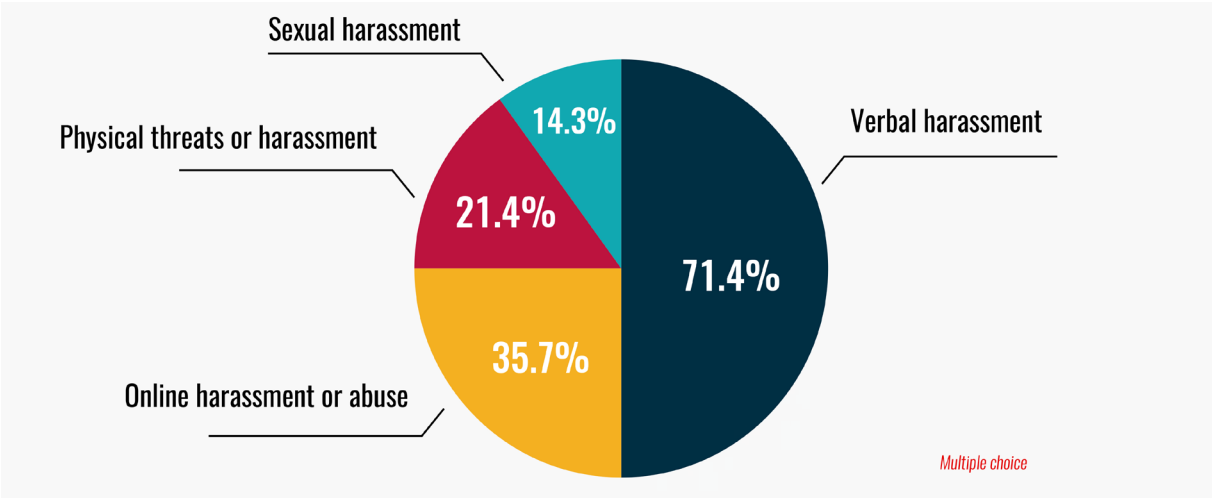
The impact of these threats on women journalists' reporting is substantial. Around 28.6% reported that their work was affected "to a large extent", while 42.9% said it was impacted "to a moderate extent". This indicates a chilling effect on journalistic freedom and the ability to report objectively on sensitive topics. Additionally, 17.6% of women journalists felt pressured to modify, delay, or abandon a story specifically due to their gender, with reporters and television journalists disproportionately affected.

Figure 29: *To what extent have gender-specific threats or intimidation affected your reporting in the past year?" (only those who felt such pressure)*
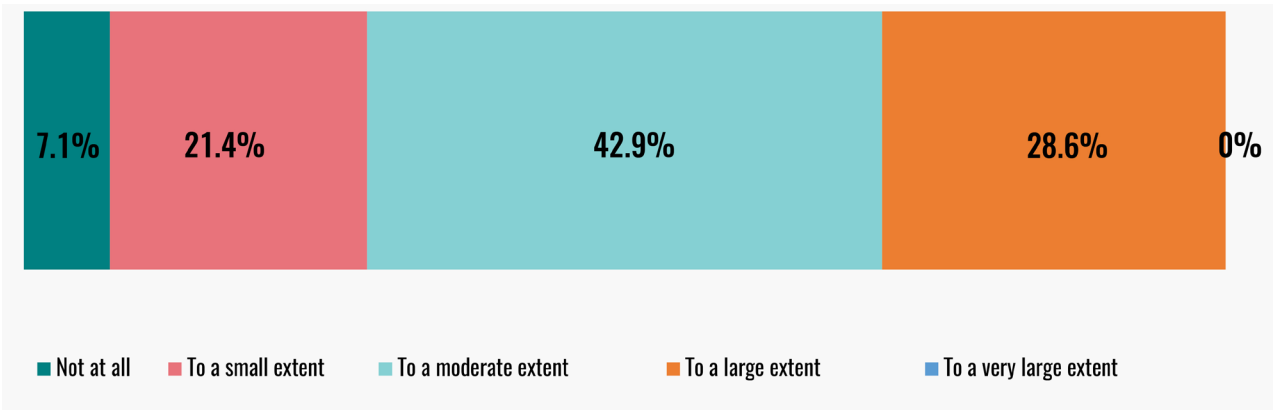
Organizational support addressing these safety concerns appears inadequate. Nearly one-third (29.4%) of female journalists reported that their safety concerns were not addressed at all by their media organizations. Another 19.1% stated they were inadequately addressed. A higher proportion of these cases were reported in private media compared to public or NGO-funded media, raising questions about institutional accountability and gender-sensitive policies within private media organizations.

In response to these challenges, only 16.2% of female journalists reported taking no safety measures due to their gender. Most said they have taken steps to protect themselves, such as enhancing security measures (41.2%), avoiding certain assignments or locations (38.2%), seeking support from women

journalists' networks (11.8%), or using pseudonyms or anonymous bylines (7.4%). Alarmingly, only 1.5% of them reported these incidents to the police, indicating a lack of trust in institutional mechanisms or fear of further retaliation.

Additionally, 26.5% of women journalists frequently or very frequently feel that their gender influences how they are treated by sources, colleagues, or interviewees. This perception reflects the pervasive gender bias in the field, impacting women's ability to operate on equal footing with their male counterparts. Only 1.5% of respondents believe there are advantages to being a woman in journalism. A staggering 82.3% feel there are significant (38.2%) or some (44.1%) disadvantages compared to men.

Figure 30: *Safety measures taken specifically because of their gender (only women)*

Enhancing digital security measures — 41.2%
Avoiding certain assignments or locations — 38.2%
Seeking support from women journalist networks — 11.8%
Using pseudonyms or anonymous bylines — 7.4%
Report to the police — 1.5%
None — 16.2%

Multiple choice
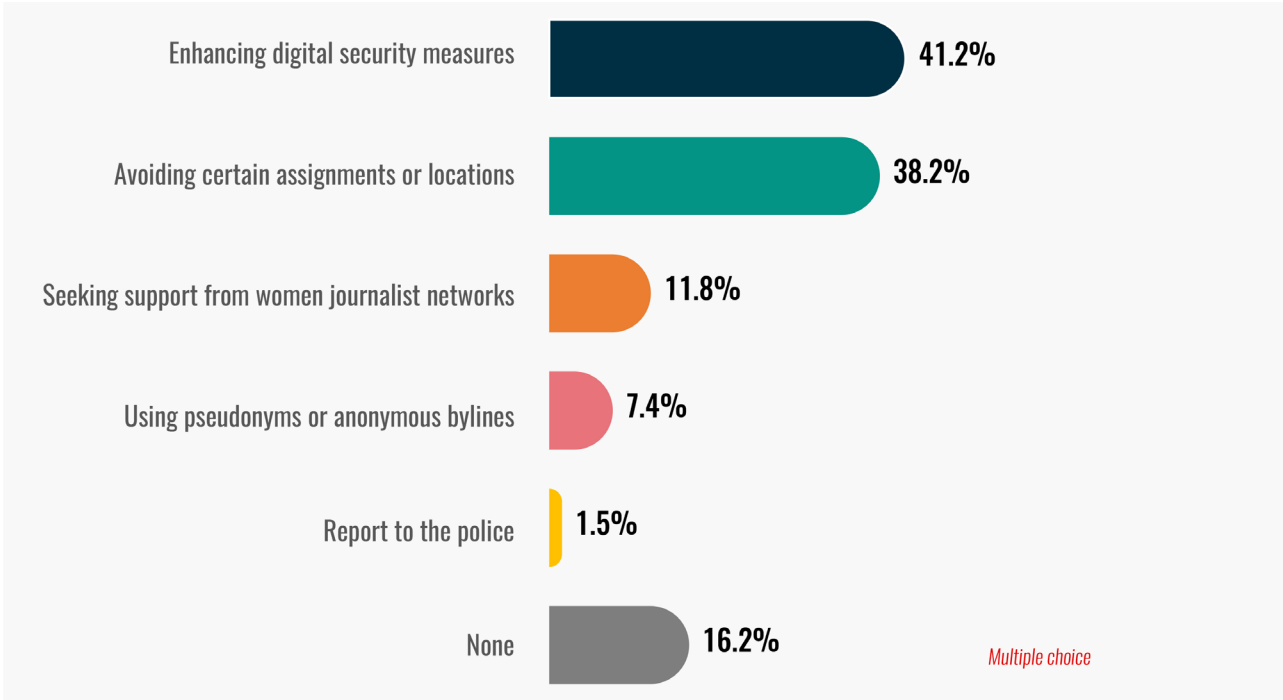
These findings expose a systemic failure to strengthen a safe and equitable working environment for women journalists in Albania. The presence of gender-specific threats, inadequate organizational support and gender-based discrimination in treatment by peers and sources highlight the need for immediate action. Media organizations must prioritize the implementation of robust gender-sensitive policies, provide training on workplace safety and inclusivity and establish clear reporting and accountability mechanisms for harassment. Moreover, the low rate of reporting incidents to the police suggests a lack of confidence in law enforcement's ability to address gender-based violence, calling for reforms to build trust and ensure justice for victims.

4.4.4. Reporting and Response

Only 18.2% of journalists who faced threats or intimidation reported these incidents to authorities or relevant institutions. Male journalists were more likely to report such incidents compared to female journalists (20.6% vs. 14.3%).

Figure 31: *Proportion of the journalists who reported threats or intimidation to any authorities or institutions (only those who faced such things)*
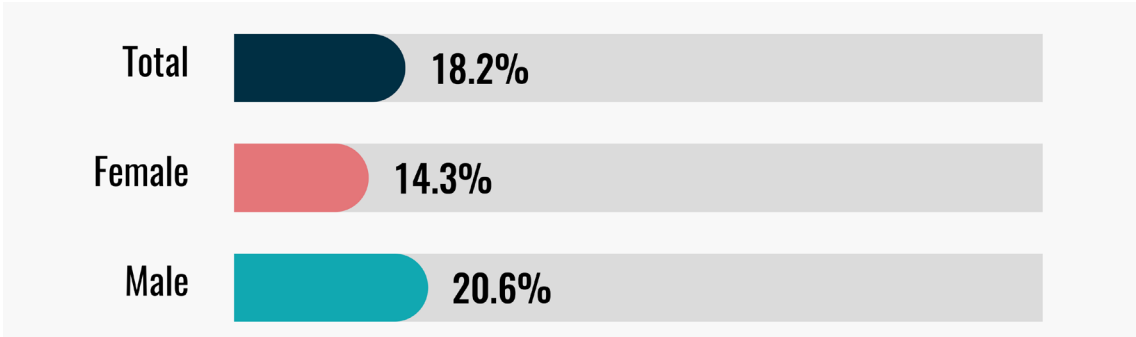
The primary reason why journalists who faced threats or intimidation did not report these incidents to authorities was a lack of trust in them (64.9%). Additionally, 45.9% of respondents felt that reporting would not make any difference. Female journalists were more likely than their male counterparts to believe that reporting would be ineffective and expressed a greater fear of retaliation or further harassment.

Figure 32: *Reasons why journalists have not reported threats or intimidation to any authorities or institutions (only those who faced such things but did not report incidents to any authorities)*

Legend: ■ Male ■ Femle ■ Total

	Male	Femle	Total
Lack of trust in authorities	68.2%	60.0%	64.9%
Belief that reporting would not make a difference	36.4%	60.0%	45.9%
Fear of retaliation or further harassment	36.4%	53.3%	43.2%
Do not wish to be confronted with perpetrator	13.6%	46.7%	27.0%
Concern about damaging relationships with sources or contacts	22.7%	6.7%	16.2%
Fear of revictimization	18.2%	6.7%	13.5%

Multiple choice

Approximately 70% of respondents who reported cases of threats or intimidation did so to the police, 60% to their media organization, 40% to a journalists' association or media organisation, 30% to the prosecution, 10% to NGOs, and 10% to their newsroom.

Figure 33: *Authorities or institutions to which respondents reported threats or intimidation (only those who reported them)*
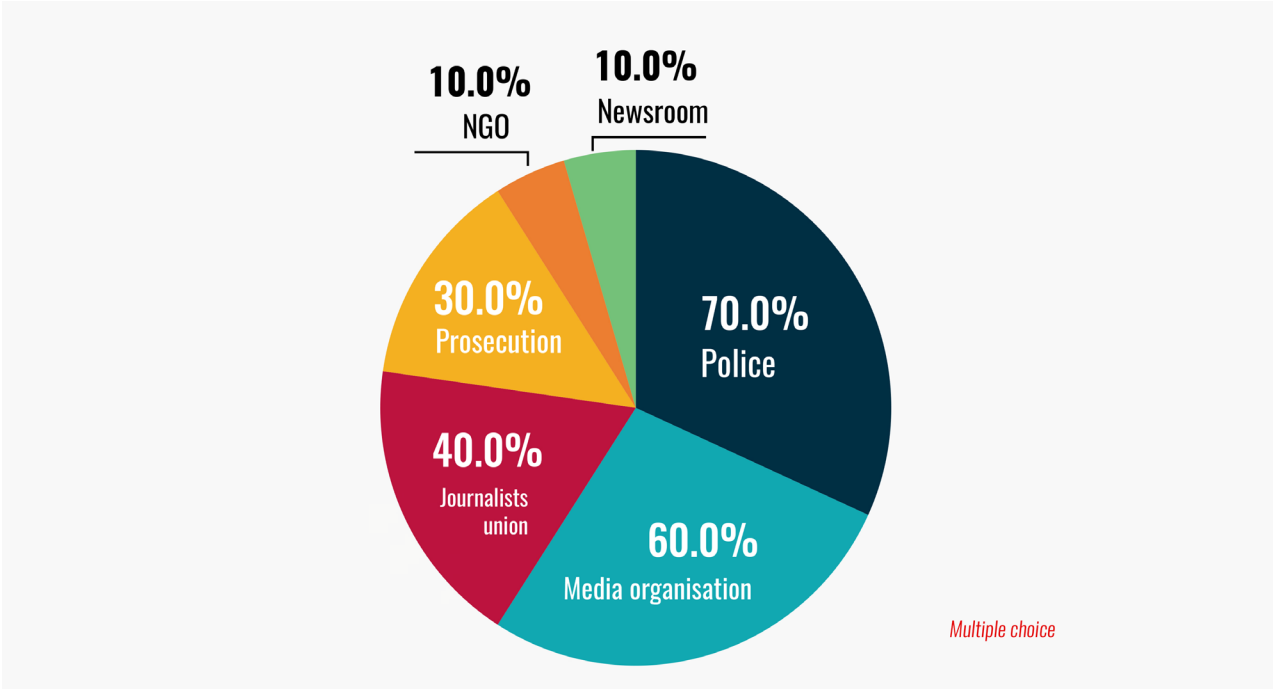
Approximately 40% of respondents who reported threats or intimidation viewed the responses from the police, prosecution and journalists' unions/associations as either very ineffective (30%) or somewhat ineffective (10%). Additionally, 30% of those who reported their cases considered the responses from media organizations and NGOs to be very ineffective.

Figure 34: *Responses from various authorities as reported by Journalists (only those who reported cases)*

	Very ineffective	Somewhat ineffective	Neither effective nor ineffective	Somewhat effective	Very effective	NA
Police	30%	10%	30%	10%	0%	20%
Prosecution	30%	10%	30%	10%	0%	20%
Journalists union	30%	10%	10%	0%	30%	20%
Media organisation	30%	0%	10%	20%	30%	10%
NGO	30%	0%	30%	20%	10%	10%
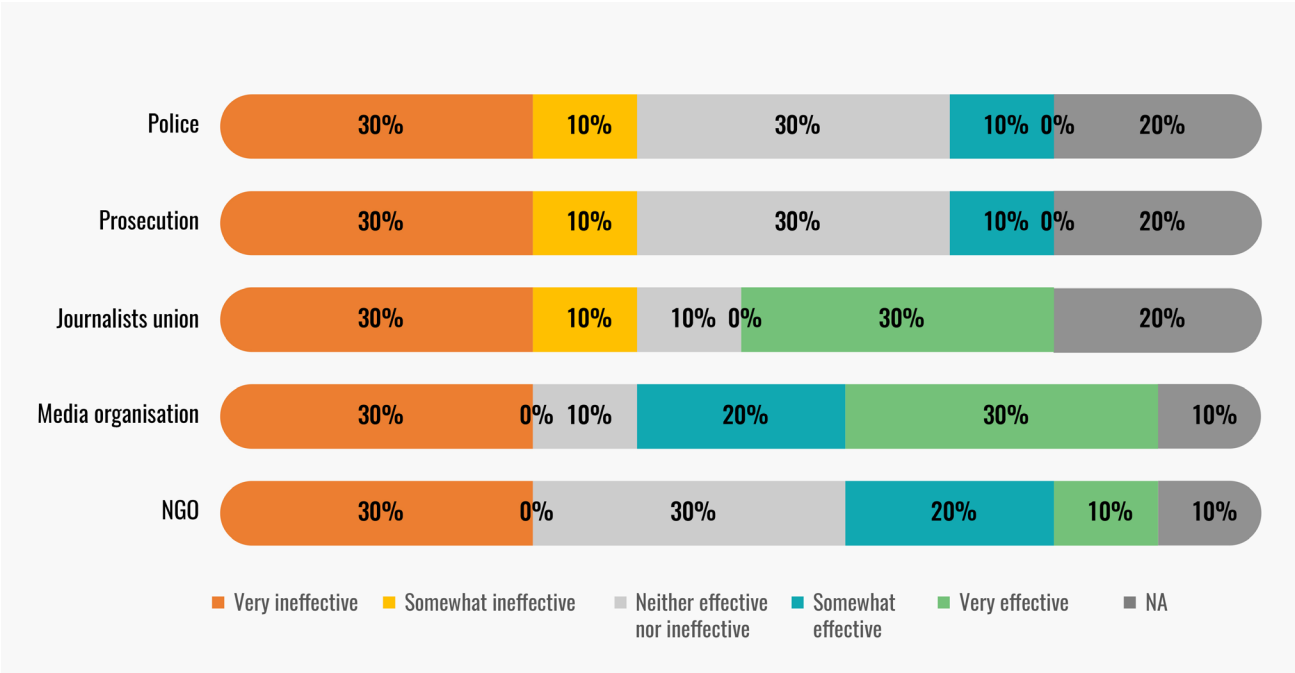
Journalists who experienced threats or intimidation from government officials primarily responded by avoiding certain topics, with 35% of them doing so. Among journalists who faced threats or intimidation from political groups, 38% avoided certain topics, while 20% reported increased anxiety or fear. Similarly, 31% of journalists intimidated by corporate entities avoided certain topics, followed by 20% who altered their reporting methods. Additionally, 31% of journalists who faced threats from advertisers or media owners avoided certain topics. When intimidation came from criminal organizations, 22% of journalists reported increased anxiety or fear. About 16% of journalists who were threatened or intimidated by their colleagues also avoided certain topics afterward.

Figure 35: *The main impact of threat or intimidation by source (only those who have been threatened or intimidated)*

	No impact	Avoided certain topics	Altered reporting methods	Increased anxiety or fear	Took additional safety precautions	Sought support or counselling	NA
Colleagues	38%	16%	9%	4%	0%	9%	24%
Criminal organizations	18%	15%	11%	22%	5%	2%	27%
Media owners	20%	31%	13%	16%	2%	2%	16%
Advertisers	25%	29%	13%	5%	2%	2%	24%
Corporate entities	18%	31%	20%	7%	2%	5%	16%
Political groups	22%	38%	7%	20%	2%	2%	9%
Government officials	22%	35%	15%	16%	4%	0%	9%

Three-quarters of respondents (74.1%) believe the lack of legal protection is the primary challenge journalists face regarding safety and freedom from intimidation. This is followed by 71.9% who cite political pressure and interference, 62.6% who mention insufficient support from media organizations, 59% who point to economic pressure from media owners or advertisers, and 53.2% who highlight inadequate responses from law enforcement and the judiciary.

Figure 36: *The main challenges facing journalists in Albania when it comes to safety and freedom from intimidation according to journalist respondents*

Lack of legal protection for journalists — **74.1%**

Political pressure and interference — **71.9%**

Insufficient support from media organizations — **62.6%**

Economic pressure from media owners or advertisers — **59.0%**

Inadequate response from law enforcement and judiciary — **53.2%**

Multiple choice
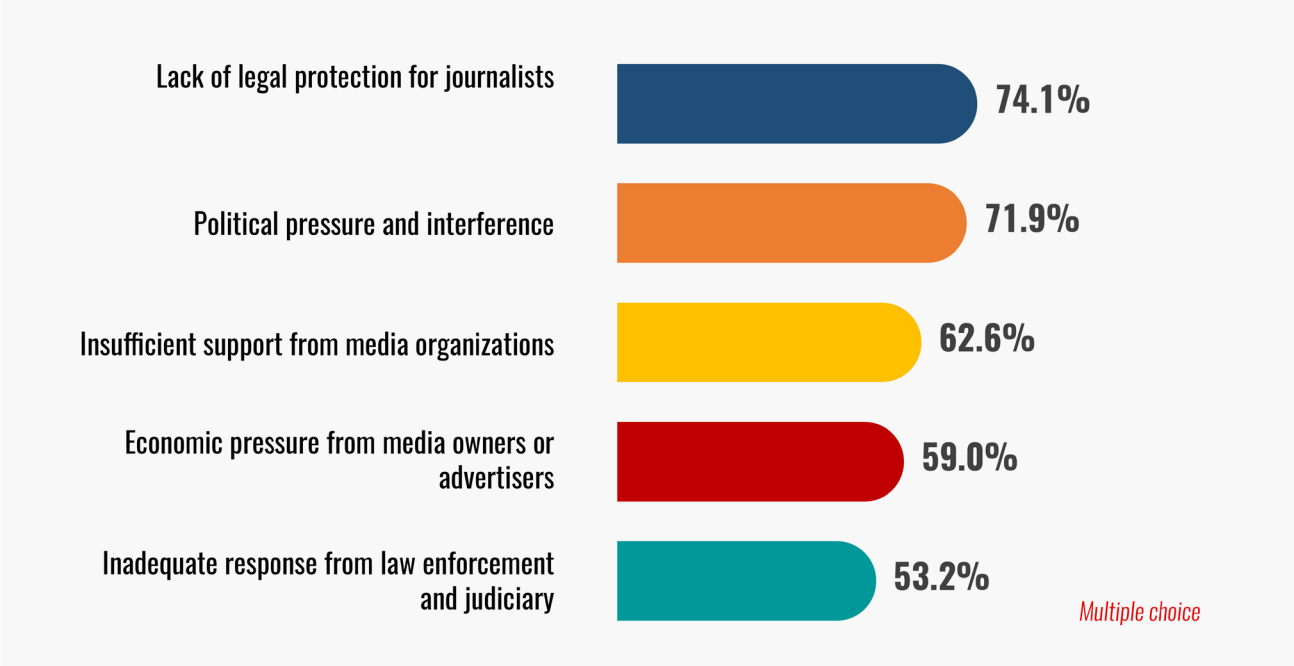
Approximately 77.7% of journalists believe that stronger legal protections would enhance the safety and security of journalists in Albania. Additionally, 66.2% think that a more effective response from law enforcement and the judiciary to threats and attacks would improve safety and security in journalism. This is followed by 61.9% who believe in the need for greater political will to protect press freedom, 61.2% who advocate for increased public awareness and support for the role of journalism, and 58.3% who feel that improved support and solidarity from media organizations would be beneficial.

Figure 37: *The main measures or actions that journalists believe could help improve the safety and security of journalists in Albania*

Measure	Percentage
Stronger legal protections for journalists	77.7%
More effective law enforcement and judicial response to threats and attacks	66.2%
Greater political will to protect press freedom	61.9%
Increased public awareness and support for the role of journalists	61.2%
Improved support and solidarity from media organizations	58.3%

Multiple choice
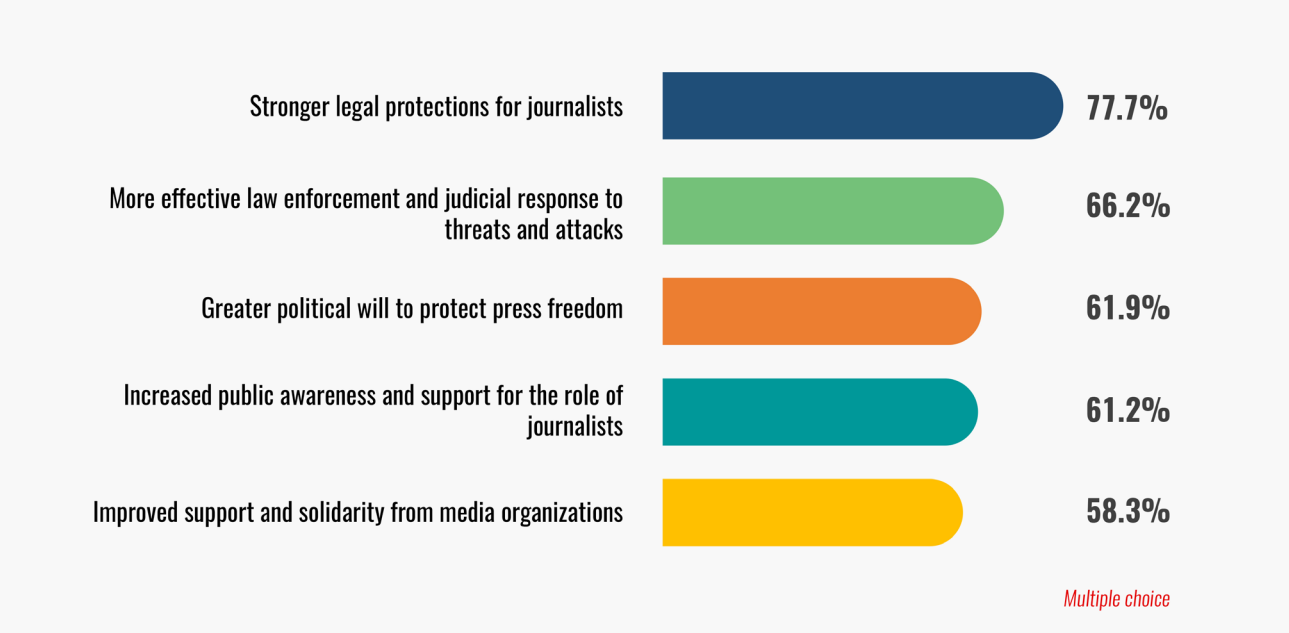
These findings reveal deep structural and systemic failures in safeguarding journalists in Albania. The reluctance to report threats and attacks, driven by mistrust in authorities and fear of retaliation, demonstrates a significant breakdown in institutional accountability and protection mechanisms. The perceived ineffectiveness of responses from police, prosecutors, media organizations and unions exacerbates this trust deficit, leaving journalists with few viable avenues for recourse.

The chilling effect of intimidation is particularly concerning, as it compromises the integrity of journalism and limits the public's access to critical information. Avoidance of certain topics due to intimidation, especially on politically or economically sensitive issues, signals a weakening of investigative journalism

and democratic oversight.

Furthermore, the gender disparities in reporting and vulnerability highlight the need for targeted interventions to address the unique challenges faced by female journalists, including tailored safety measures and mechanisms to combat gender-specific threats and intimidation.

4.4.5. Progress towards Roadmap's Provisions regarding Journalists' Safety

The findings from the survey highlight the pervasive challenges journalists face in Albania, including threats, intimidation and a lack of institutional support. These issues align closely with the priorities outlined in the Rule of Law Roadmap, which proposes critical measures to address these gaps through legal reforms, strengthened monitoring mechanisms and enhanced collaboration between state and civil society actors. This section examines these roadmap provisions, evaluates progress made, and identifies the implications of delayed implementation for journalists' safety and media independence.

Regarding the measure "the safety of journalists is ensured through capacity building of relevant law enforcement agencies", the Council of Europe continued to provide targeted training for the judiciary on freedom of expression and safety of journalists. In addition, other civil society organizations supported by various donors are working on stakeholders' engagement and establishing a mechanism for improving the safety of journalists.[60] The Prosecutor General approved a circular for the investigation of issues related to the safety of journalists as an initial step towards creating a safer environment for journalists and media workers in Albania.[61]

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[60] SCiDEV Stakeholders' Briefing 2024
[61] Circular of the General Prosecutor, October 2024

Regarding the measure "AMA adopts an Action Plan for the safety and protection of journalists' rights by 2024", the Action Plan has not been adopted yet. In response to our FOI, the AMA argued that it has raised serious concerns on various cases of attacks against journalists and has supported several projects addressing safety of journalists in audiovisual media.[62]

Albania is a member of the Council of Europe's Campaign for the Safety of Journalists and in 2024 the Focal Point for Albania changed from the Ministry of Foreign Affairs to the Ministry of Interior.[63]   No national action plan for the safety of journalists as required by the Council of Europe Campaign has been announced, although some specific measures are included in the Roadmap.

Regarding the measure "A comprehensive analysis of SLAPPs should include an evaluation of their prevalence, impact on media freedom and public discourse, and the adequacy of existing legal and institutional frameworks in addressing such cases. The analysis should identify gaps and propose corrective measures, whether through legislative amendments or institutional practices, ensuring alignment with European standards and the EU acquis", in October 2024, in a roundtable organized by civil society organisations, Ulsi Manja, Minister of Justice, reiterated Albania's commitment to advancing media freedom by incorporating anti-SLAPP protections into domestic legislation by June 2027. He acknowledged the need for faster legal procedures, specialized judge training, and a structured dialogue to create a supportive environment for free journalism.[64]   The process is expected to start in 2025 and the Ministry of Justice has requested the expertise and support of the Council of Europe.[65]

There is no dedicated regulation under Albanian legislation that addresses specifically provisions aimed at countering SLAPPs. To adapt the anti-SLAPP directive[66] of the European Union and Recommendation

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[62] AMA response to FOI, October 2024

[63] Council of Europe, Albania, National Chapter

[64] Roundtable on Aligning Albania's Legal Framework with the EU and CoE Anti-SLAPP Standards

[65] Public Commitments, 2024

[66] EU Anti-SLAPP Directive

of the Council of Europe,[67] significant amendments are needed in the Civil Procedure Code and Criminal Code[68]. Amendment of these codes means instalment of key indicators to identify SLAPPS, early dismissals, including timelines for burden of proof, security of procedural costs, restitution of legal costs and stay of proceeding[69] .

Given that SLAPPs often intersect with elements of criminal contraventions, it is crucial to review how criminal proceedings affect SLAPP cases. Early dismissal of lawsuits and other claims against public participation is a key measure that needs to be undertaken to foster Anti-SLAPP practices.[70] The Criminal Code's provisions on defamation (articles 119 and 120) should be reviewed to ensure that they do not unintentionally support SLAPPs or impede freedom of expression. Furthermore, a successful implementation of Anti-SLAPP provisions requires training programs for judges, lawyers, and legal professionals. Anti-SLAPP legal changes should be monitored regularly, and feedback mechanisms should be established to assess the effectiveness of the new legal safeguards.[71]

Finally, adopting a stand-alone Anti-SLAPP law[72], alongside amendments of both the civil Procedure Code and the Criminal Code, is deemed a key element in addressing SLAPPs in the country. Regarding the measure "the Police Academy continues to provide training, including the monitoring of violence against

[67] Council of Europe Recommendation on anti-SLAPP
[68] Working Paper: Initial Assessment of Albania's Legal Framework for Harmonizing the Anti-SLAPP (Strategic Lawsuits Against Public Participation) Directive
[69] Regional Baseline Assessment of Legislative and Policy Needs for Implementing Council of Europe and European Union Standards on Countering the Use of SLAPPs, December 2024
[70] Regional Baseline Assessment of Legislative and Policy Needs for Implementing Council of Europe and European Union Standards on Countering the Use of SLAPPs, December 2024
[71] Working Paper: Initial Assessment of Albania's Legal Framework for Harmonizing the Anti-SLAPP (Strategic Lawsuits Against Public Participation) Directive
[72] Regional Baseline Assessment of Legislative and Policy Needs for Implementing Council of Europe and European Union Standards on Countering the Use of SLAPPs, December 2024

journalists, starting from 2024, based on annual planning", one two-day training session in September 2024 was organized by the Policy Academy on media freedom and safety of journalists with the Union of Journalists. A specific order (No. 1180) for the approval of the standard procedure on planning of the Police services during protests in relation to journalists was approved on 16th August 2023 by the General Director of the State Police. In 2024, the Council of Europe supported the Police in development of a protocol for handling cases of attacks against journalists and media workers. By Order 1399, dated 21st October 2024, a working group was established by the Police for the development of the Protocol for Protection of Journalists and Handling Cases of Attacks. The protocol is to be consulted with media organisations and journalists before approval.

Regarding the measure "the State Police and prosecutorial services designate a contact point within their structures responsible for addressing attacks on journalists by 2024 and ensure public awareness and information about such cases starting from 2024 onward," the General Prosecutor's Office appointed the Advisor for Media as the contact person for reporting and following up on cases of attacks against journalists and media workers in October 2024. The State Police has not yet publicly announced the contact person for the safety of journalists.

Regarding the measure "the General Prosecutor's Office publishes case-by-case results of investigations involving journalists from 2024 onward," the General Prosecutor approved a circular for the investigation of issues related to the safety of journalists as an important initial step towards creating a safer environment for journalists and media workers in Albania. Case-by-case publications have not been made in 2024. As of 22nd October 2024, there was only 1 reported case of an attack by a journalist. That case is under investigation according to the General Prosecutor's Office.[73]

Regarding the measure "the High Judicial Council (KLGJ) collects and publishes data on cases involving

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[73] Response to FOI, October 2024

journalists starting from 2023 onward," the KLGJ has not published this data in 2024. The online system offers statistics on the number of cases involving journalists/media workers, but it is not possible to discern on what grounds, the time period and if cases relate to work by a journalist on private matters.

There is no information on the progress of the measure "the School of Magistrates enables the training of judges on the adequate handling of SLAPP cases". However, the School of Magistrates cooperates with various organizations and donors to provide training to judges and prosecutors.

The delays and gaps in implementing roadmap provisions have significant implications for journalists' safety and media independence in Albania. The continued prevalence of threats, intimidation, and pressures, including through lawsuits, has a negative effect on journalism in the public interest, undermining accountability and democratic oversight.

4.5.   Working Conditions of Journalists

Working conditions for journalists in Albania are marked by instability, inadequate remuneration and a lack of professional safeguards. Many journalists operate under informal or temporary employment arrangements, with limited negotiation powers. In some cases, there are no formal contracts in place for journalists and media workers. Even in cases when a formal contract is in place, journalists often are not provided a copy of it, hindering their ability to formally acknowledge their rights and obligations, and use that as a negotiating starting point, or even take their employers to court in case of violations. In this situation, journalists are left vulnerable to sudden job loss and exploitation.[74] Formal salaries in the

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[74] Safe Journalists Network Report 2024 Albania

media sector are generally low, often insufficient to meet basic living standards, and journalists frequently face delays in receiving their pay.[75] Furthermore, in 2024, some private media facing financial challenges have failed to pay staff social and health contributions as per national legislation, further hindering the economic safety of journalists and media workers.[76] These unfavorable conditions are compounded by limited access to health insurance and other social benefits, forcing journalists to work in high-stress and insecure circumstances.[77] The absence of comprehensive labor protections and collective bargaining rights exacerbates their precarious situation.[78] This challenging environment undermines their independence and professional integrity, often resulting in self-censorship or susceptibility to external pressures, including political and economic influences.

A significant portion of respondents (42.4%) reported a decline in working conditions over the past year, with only 21.6% observing any improvement. This highlights a widespread perception among media professionals of deteriorating conditions. The lack of robust legal protections emerged as a primary challenge, cited by 74.1% of journalists. This absence of legal safeguards significantly impacts their economic security. Women and younger journalists were more likely to perceive deteriorations in working conditions, with women also reporting higher instances of gender-specific challenges, including threats and intimidation.

Between January 1 and September 20, 2024, the State Inspectorate for Labor and Social Services conducted 34 inspections across 31 media entities, uncovering a total of 79 violations. The breakdown of violations reveals a stark imbalance in employment practices, with 60% of violations related to regulating employment relationships. Instances of non-payment for overtime, holidays, and night shifts were frequent,

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[75] https://ahc.org.al/wp-content/uploads/2024/12/BAROMETRI-I-MEDIAS-FINAL-PDF.pdf

[76] Interview with journalists, Tirana, September 2024

[77] Interview with journalist, Tirana, September 2024

[78] Interview with media expert, Tirana, October 2024

affecting 18 media employees, 3 of whom were women and 15 men. Additionally, 16 employees were found to have worked more than the legally prescribed 40 hours, with the gender disparity again evident. A smaller proportion of violations (22%) involved workplace health and safety, suggesting a significant risk to media sector workers' physical well-being. The remaining 18% were linked to informal employment practices, underscoring a persistent issue of "gray informality."[79]

While there is systemic noncompliance with labour laws in the media sector, the response from enforcement agencies appears insufficient. Merely offering recommendations after inspections falls short of resolving underlying issues, as these violations persist without concrete deterrents or sanctions. Notably, there is little sign that either the Labor Inspectorate or the Tax Directorate have taken effective action against media outlets failing to pay social security and health contributions. These patterns underscore a broader systemic problem that goes beyond individual infractions.

As per the Rule of Law Roadmap, the State Inspectorate for Labor and Social Services is expected to adopt a risk-based inspection methodology by 2025 to enforce journalists' labor rights effectively.[80] In 2023, with ILO support under the ESAP 2 Project, it implemented the improved Penalty Matrix (MPS 2.0) for uniform legal enforcement and introduced the Risk Analysis System (RAS), using advanced technologies like data mining and machine learning for efficient inspection planning.[81] These systems aim to improve the effectiveness and productivity of inspections and are currently being refined. In the FOI response, they do not specify how is this applicable to journalists and media and how it will be implemented.

The Albanian School of Public Administration (ASPA) is expected to continue providing targeted training

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[79] Response to FOI Request by the State Inspectorate for Labor and Social Services, October 2024
[80] Rule of Law Roadmap
[81] Response to FOI Request, October 2024

programs for the State Labor Inspectorate's staff.[82] These programs are designed to build the capacity of inspectors to conduct risk-based inspections with a focus on journalists' labor rights. However, there is limited publicly available information regarding the progress of these training initiatives or their practical impact on improving journalists' working conditions.

4.6. Access to Information

Access to information in Albania remains a significant challenge, reflecting broader issues of transparency and accountability. Despite the existence of a legal framework guaranteeing access to public information, implementation is often inconsistent.[83] Public institutions frequently fail to respond to requests for information within the legal timeframes, citing vague or unjustified reasons for denial.[84] This lack of responsiveness is compounded by inadequate enforcement mechanisms, leaving requesters with limited recourse. Additionally, there is a concerning trend of withholding information under the guise of protecting privacy or national security, even when these justifications are unwarranted.[85] The situation is exacerbated by limited public awareness of the right to access information and the avenues for redress, further marginalizing civil society and journalists who depend on such access for their work.[86]

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[82] Rule of Law Roadmap

[83] Safe Journalists Network Report 2024 Albania

[84] Keynote of the Commissioner at the VI Conference on the Right to Information, 2024

[85] Safe Journalists Network Report 2024 Albania

[86] Interview with civil society representative, Tirana, September 2024

In the first three quarters of 2024, the Commissioner for the Right to Information and Personal data Protection received 286 complaints concerning the refusal to provide information and official documents. Of these, 218 cases were resolved by granting the requested information during the administrative review process.[87] Over the years, widespread negligence is persistent as demonstrated by the fact that over 70% of complaints are resolved only after the initiation of an administrative review by the Commissioner's Office.[88] This reactive approach undermines public perceptions of transparency and burdens administrative resources. Expert interviews raise criticisms of the Office of the Commissioner for the Right to Information and Personal Data Protection, stating that they take a long time to answer journalists' complaints, contributing to a loss of momentum for specific pieces that they are working on. Another concern is that the Commissioner does not always take a decision on complaints.[89] Critics argue that the Commissioner often refrains from imposing meaningful sanctions on public institutions that fail to comply with FOI requests.[90]

In 2024, this concerning trend persisted, as public authority leaders continued to prioritize real-time updates on their private accounts on social media platforms while neglecting the legally mandated Transparency Programs, which are essential for ensuring accountability and public access to information.[91] There is resistance and a lack of awareness within the administration to proactively disclose public information. Key details, such as biographies of officials, updated legislation, regulations, budget execution data, contracts and citizen services, are often omitted.[92] Authorities occasionally deny access to information, citing potential harm to the state without legal justification or public interest assessments, violating constitutional rights.[93] Requests are improperly delegated between public authorities, despite the

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[87] Response to FOI Request, September 2024

[88] Keynote of the Commissioner at the VI Conference on the Right to Information, 2024

[89] Interview with journalist, Tirana, September 2024

[90] Interview with civil society representative, Tirana, September 2024

[91] Interview with journalist, Tirana, September 2024

[92] Keynote of the Commissioner at the VI Conference on the Right to Information, 2024

[93] Keynote of the Commissioner at the VI Conference on the Right to Information, 2024

information being available within the delegating authority, reflecting inefficiencies and poor coordination. Internal coordination failures within public authorities hinder responses to journalist requests, interviews, or public statements.[94]

Findings from the administered survey confirm such concerns. The majority of respondents believe that enforcement of the right to access information by public institutions in Albania has deteriorated (with 37.7% indicating a "Significant Decline" and 16.7% a "Moderate Decline").

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[94] Interview with journalist, Tirana, September 2024

Figure 38: *"How has the implementation of the right to access information by public institutions in Albania changed over the past year?", by gender*
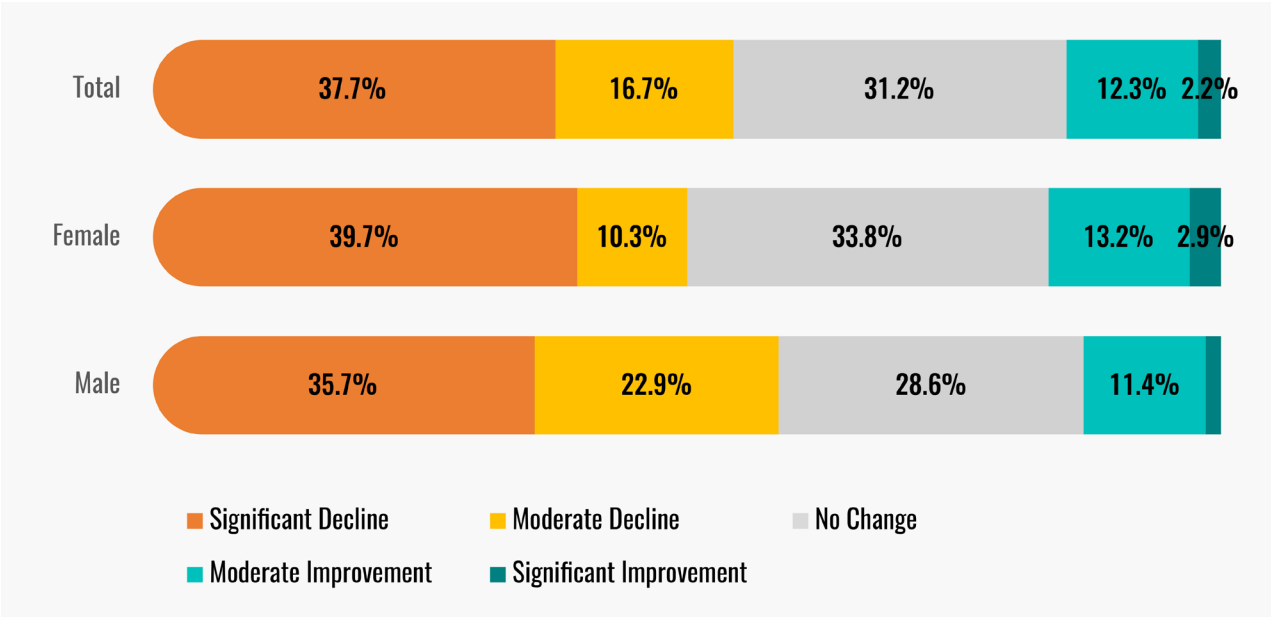
The data reveals widespread concerns among journalists about declining access to information from public institutions in Albania, particularly among those with the least and most experience. Journalists with less than three years and more than ten years of experience overwhelmingly reported a deterioration in access, with 61.6% and 61.2% respectively citing declines. Notably, 44.9% of the most experienced group said they had observed a "Significant Decline", while 30.8% of the least experienced noted the same. By contrast, journalists with 4-6 and 7-10 years of experience displayed more balanced perceptions, with higher proportions reporting either "No Change" (38.1% and 32.4%, respectively) or moderate improvements (16.7% and 14.7%).

Figure 39: *"How has the implementation of the right to access information by public institutions in Albania changed over the past year?", by respondent's experience in journalism*
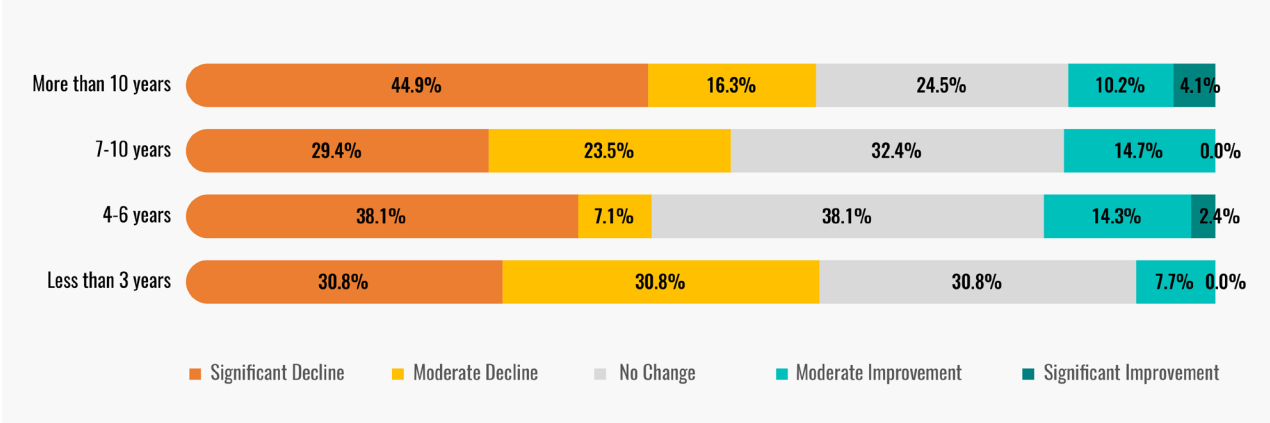
These findings underscore a general sentiment of declining transparency, highlighting systemic barriers to accessing public information in Albania. Participants at the year-end roundtable with journalists expressed concerns over the distribution of pre-made audiovisual and text materials by government and political actors, emphasizing the heightened sensitivity of this issue during elections.[95] This practice does not allow journalists and media to exercise their watchdog function and offer verified and independent content to their audiences. This situation has broader implications for Albania's EU integration efforts, where transparency and accountability are key benchmarks for progress. The lack of proactive disclosure of information and administrative inefficiencies in addressing complaints regarding access to information potentially hinder Albania's accession ambitions.

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[95] Year-end gathering with journalists: 2024 review and 2025 outlook in media freedom and journalist safety, December 2024

5. CONCLUSIONS AND RECOMMENDATIONS

5.1. Conclusions

The findings of the Annual Report 2024 reveal a complex and challenging environment for media freedom and journalistic safety in Albania, with no significant progress recorded. Albania's EU accession process offers a structured framework for reforms; however, progress in implementing EU recommendations on media freedom and journalist safety remains and risks being a 'box-ticking' exercise without meaningful change and real impact. Persistent gaps in addressing media ownership concentration and transparency, working conditions, access to information and safety measures highlight the need for a stronger political commitment and sustained efforts to align with European standards.

High levels of media ownership concentration and lack of transparency continue to undermine editorial independence. The dominance of private media significantly influences journalistic practices, often prioritizing business or political interests over unbiased reporting and the public interest. This situation raises serious concerns about the integrity of media content and the ability of journalists to operate without undue pressure.

The safety of journalists remains a pressing concern, with intimidation, pressures and threats to media professionals escalating in recent years. Gender-specific threats disproportionately affect women journalists, further exacerbating vulnerabilities within the media sector. Systemic weaknesses in institutional responses to these threats and a lack of robust protective measures have compounded the challenges journalists face in Albania.

Journalists also endure precarious working conditions, characterized by low wages, informal and delayed payments and lack of professional safeguards. These unfavorable conditions foster self-censorship and

leave media professionals susceptible to external pressures, undermining their independence and the quality of journalism. Despite laws guaranteeing access to public information, implementation remains inconsistent, with public institutions frequently failing to meet their obligations. This lack of transparency and accountability further hinders journalistic efforts and undermines public trust.

Structural challenges, such as the absence of robust self-regulatory mechanisms, ineffective enforcement of labor rights and limited institutional support for journalists hinder the development of a safe and independent media environment. Additionally, delays in implementing the Rule of Law Roadmap measures have significant implications for journalists' safety and media independence, reflecting gaps in institutional accountability and capacity.

While Albania has made some efforts to meet the EU benchmarks, significant systemic and structural challenges remain. Addressing these issues requires a comprehensive and sustained approach that prioritizes media freedom, safety and transparency as essential pillars for democratic development and EU accession.

5.2. Recommendations

Enhancing media ownership transparency

- Strengthen legislative frameworks to limit media ownership concentration, increase transparency in media financing and establish enforcement mechanisms for investigating breaches of ownership regulations.

- Adapt media legislation to ensure adequate transposition of the European Media Freedom Act.

- Enact legislation to empower independent institutions to investigate hidden ownership interests, media market concentration, unfair competition, coordinated behaviour, copyright avoidance and misuse of state funds and advertisements, aligning with the standards of the Council of Europe.

- Empower independent institutions to investigate ownership conflicts and ensure compliance with transparency regulations.

- Build on the AMA's progress in publishing ownership structure data by expanding transparency to include conflicts of interest and hidden influences, ensuring comprehensive accountability.

- Establish clear rules governing the allocation of state advertising and state resources for goods and services.

- Strengthen inter-institutional collaboration to exert control over media concentration and effective implementation of the AMA's decision no. 40/2024.

Transparent audience engagement

- Ensure an open, transparent and inclusive process in designing a methodology for audience measurement to achieve media transparency and gradual implementation of the European Media Freedom Act.
- Ensure transparency of the Joint Industry Committee's work and include media associations and civil society organizations to oversee the process

Structured dialogue

- Establish government ownership of the structured dialogue for media freedom by designating an institution to lead the process, as well as ensure participation of all institutions and non-

institutional representatives whose work impacts journalists' work, including, but not limited to, the Labor Inspectorate, Police, the Prosecutor's Office and judicial system representatives.

- Urgently start evaluation of the work of the MIA, ensuring transparency and accountability.
- Make the role of the MIA in the EU integration process transparent, and how its work stands vis-à-vis the overall institutional framework addressing disinformation and FIMI.

Improving journalists' safety

- Ensure transposition of the EU anti-SLAPP Directive 2024/1069 on protecting persons who engage in public participation from manifestly unfounded claims or abusive court proceedings (SLAPPs) and implement the Council of Europe Recommendation CM/Rec(2024)2 on countering the use of strategic lawsuits against public participation.

- Ensure active participation and alignment with the Council of Europe Platform for the Safety of Journalists.

- Institutionalize and consolidate established contact points within the State Police and prosecutorial services to address attacks on journalists, ensuring clear mandates and sustained support.

- Strengthen the chain of investigation, transparency and responsiveness to end impunity over journalistic crimes.

- Finalize and implement the comprehensive protocol at the State Police for handling cases of journalistic intimidation, incorporating feedback from media organizations and civil society.

- Build on the Prosecutor General's circular to ensure systematic case-by-case publications of investigations involving journalists.

- Continue capacity-building of relevant law enforcement agencies, including continuous and repetitive trainings, to foster sustainable practices in protecting journalists' safety.

- The AMA should adopt the already delayed Action Plan on the safety and protection of journalists' rights in audiovisual media by June 2025.

- Define a clear timeline for preparation of amendments to the Civil Procedure and Criminal Code. Ensure the process is a transparent and includes media organizations and associations.

- Start conducing a gaps assessment of implementation of the standalone Anti-SLAPP law in Albania.

- Ensure transparency and inclusion of interested stakeholder in the work of the working group established by the State Police for the development of the Protocol for Protection of Journalists and Handling Cases of Attacks, and clarify a development timeline.

- The High Judicial Council should upgrade the online statistics system on cases involving journalists/media workers as per the provision in the Roadmap and the recommendations of media organisations and civil society.

Addressing gender-specific threats

- Strengthen organizational policies to address gender-specific threats and harassment in media workplaces, ensuring accountability.

- Expand existing training programs to focus specifically on handling gender-based threats in law enforcement and judicial systems.

- Develop formal support networks for women journalists, providing mentorship and accessible reporting mechanisms for gender-specific concerns.

- Awareness and capacity building with the police, especially in entities outside the capital.

Strengthening working conditions

- Ensure employers' transparency regarding compliance with the labor rights of journalists and media workers and full adherence to the Labor Code

- Enhance enforcement of labor rights by accelerating implementation of the State Labour Inspectorate's risk-based inspection methodology.

- Increase capacities of the State Labor Inspectorate to conduct frequent inspections and enforce measures when employers are found in breach, while ensuring that inspections are not used as a tool to pressure or silence media.

- The State Labor Inspectorate should increase transparency on how the systems it has developed – Penalty Matrix (MPS 2.0) and Risk Analysis System (RAS) – are used to increase its efficiency. Such transparency should be backed up by data on the number of inspections, frequency, measures taken, and on which entities in the media sector.

- Collaborate with journalists' organisations and NGOs to promote fair labor practices, including timely payment and access to social benefits.

- Increase transparency on the targeted capacity-building trainings ASPA is conducting for the State Labour Inspectorate staff. Publish a training calendar and other training related information.

- International organizations working with private media in the country should promote and include in their work frameworks clauses of adherence to the labor code and improved working conditions of journalists.

Improving access to information

- Build on the Commissioner for the Right to Information's progress by instituting mandatory

proactive disclosure requirements for public institutions.

- Establish shorter, binding deadlines for responding to information requests, with penalties for non-compliance.

- Address internal coordination failures within public authorities to ensure efficient and timely responses to journalists' requests.

- Prepare and enforce measures to increase institutions' proactive transparency.

- Support the Commissioner for the Right to Information with capacities to investigate and provide timely responses to requests by journalists, to aid investigative momentum.

- The Commissioner for the Right to Information should impose more fines and other non-soft measures on institutions that abuse the right to access to information.

- Public institutions should implement transparency programs and foster communication through official channels, as provided by the law.

Fostering self-regulation and ethical journalism

- Provide financial and technical support to self-regulatory initiatives like the Alliance for Ethical Journalism and other journalists' organisations and civil society to strengthen their capacity.

- Ensure the authority of the self-regulatory body is recognized within the community and externally by incorporating it into the law.

- Promote sector-wide adherence to ethical codes through workshops and sustained engagement with media organizations.

- Encourage collaboration between media outlets to collectively address systemic issues like defamation and self-censorship.

- Support knowledge transfer between Albanian and EU-based journalists to promote self-regulation and ethical journalism.

Engaging international support

- Strengthen collaboration with EU institutions to accelerate alignment with European media standards and secure funding for capacity-building initiatives.

- Seek technical expertise to design and implement transparent audience-measurement systems to improve media market accountability.

- Facilitate exchange programs and best-practice sharing with media professionals from EU member states to foster innovation and resilience in the Albanian media sector.

ANNUAL REPORT 2024:

Tracking Albania's Progress on Media Freedom and Journalistic Safety in Line with European Union Standards