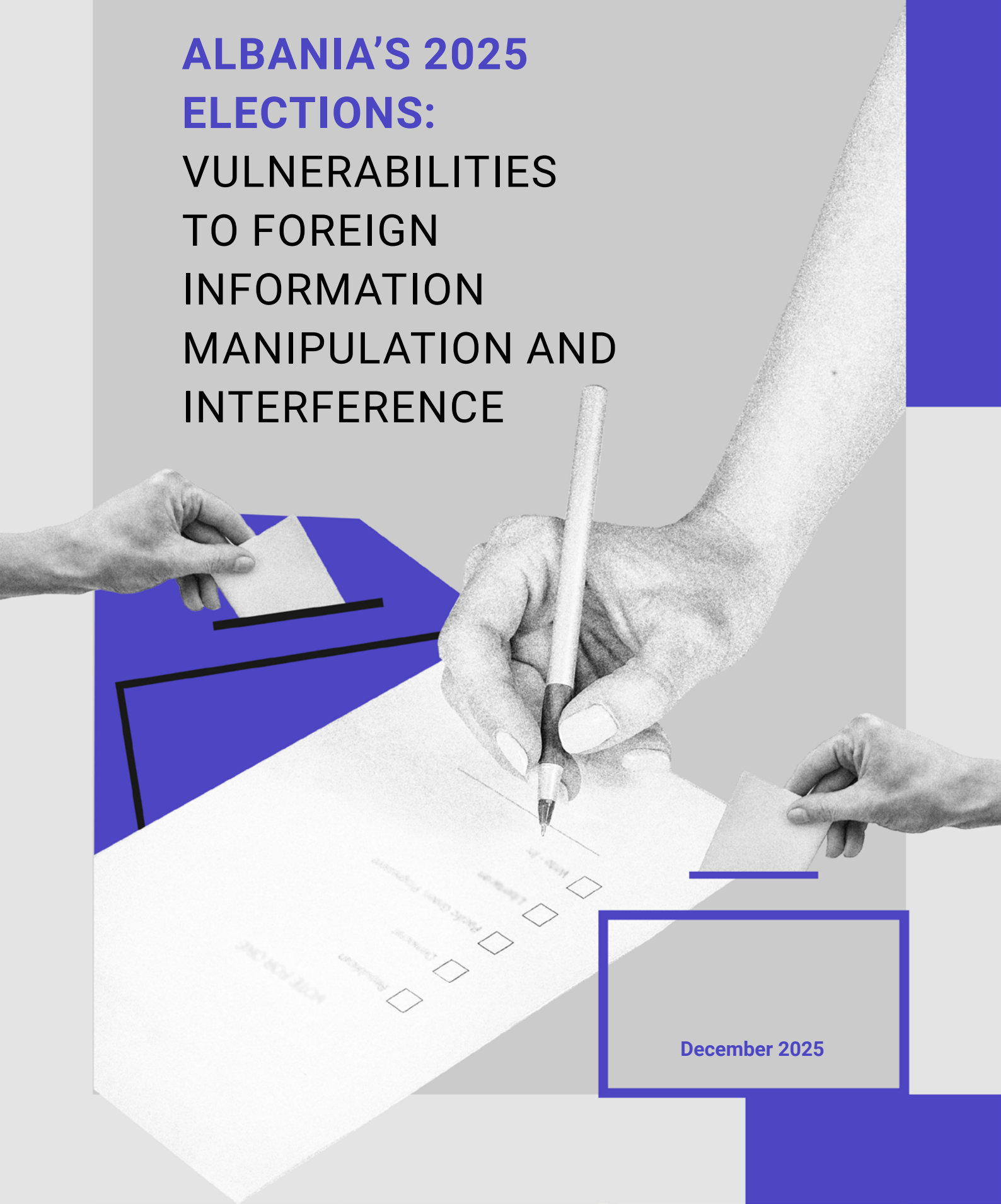


ALBANIA'S 2025 ELECTIONS: VULNERABILITIES TO FOREIGN INFORMATION MANIPULATION AND INTERFERENCE



December 2025

BIRN

Balkan
Investigative
Reporting
Network

ALBANIA

**ALBANIA'S 2025
ELECTIONS:
VULNERABILITIES
TO FOREIGN
INFORMATION
MANIPULATION AND
INTERFERENCE**

December 2025

Published by: Balkan Investigative Reporting Network in Albania
Str. Nikolla Jorga, No. 8/8, Tirana, Albania
<http://birn.eu.com/>

Authors: Kristina Voko
Besar Likmeta

Editors: Megi Reçi
Marsida Gjoncaj

Translator: Alma Koçi

Copyeditor: Stephanie Huitson



The electronic version of this publication is available under a Creative Commons Licence (CC)-Creative Commons Attribution-NonCommercial-ShareAlike 4.0 International. You are free to copy, distribute and transmit the publication as well as to remix and adapt it provided it is only for non-commercial purposes, that you appropriately attribute the publication and that you distribute it under an identical licence. For more information on this CCI, see: <http://creativecommons.org/licenses/by-nc-sa/4.0/>.

TABLE OF CONTENTS

LIST OF ABBREVIATIONS	7
EXECUTIVE SUMMARY	9
INTRODUCTION	11
Purpose and methodology	12
MAPPING VULNERABILITIES OF ELECTION-RELATED FIMI IN ALBANIA	15
Domain: Systemic vulnerabilities of the electoral process and public trust	15
Low trust in institutions	16
Formal regularity of the electoral process and inequality of the contest	17
Delegitimization of political competition through disinformation and polarizing discourse	21
The impact of organized crime and corruption on the electoral process	26
Domain 2: Regulatory framework and political party financing	28
Unstable regulatory framework and delayed reforms	29
Gaps in the regulation of political parties and campaign financing	30
Lack of alignment with international standards	33
Domain 3: Media and electoral information between formal pluralism and fragmented regulation	36
Lack of media pluralism and independence	37
Limited legal framework on media and campaign coverage	39
Political advertising in audiovisual media and the distortion of electoral competition	43

	The unregulated online media space and exposure to disinformation	46
	The presence and influence of foreign media in Albania's information space	49
	Domain 4: Digital space, platforms, and the risk of electoral information manipulation	51
	Lack of a legal framework for regulating digital platforms	52
	Inequality in resources and the limitations of digital campaign self-regulation	54
	Lack of transparency and accountability for digital political advertising	57
	Third parties and non-transparent interference in digital campaigns	60
	Domain 5: Digitalization of electoral processes and cybersecurity	63
	Digitalization of electoral processes and risks of information manipulation	64
	The cybersecurity of electoral infrastructure and exposure to hybrid attacks	67
	CONCLUSIONS	70

List of abbreviations

AMA	Audiovisual Media Authority
CEC	Central Election Commission
EEAS	European External Action Service
FIMI	Foreign information manipulation and interference
International IDEA	International Institute for Democracy and Electoral Assistance
LGBTQ+	Lesbian, gay, bisexual, transgender, and queer
NATO	North Atlantic Treaty Organization
ODIHR	Office for Democratic Institutions and Human Rights
OSCE	Organization for Security and Co-operation in Europe
SPAK	Special Structure against Corruption and Organized Crime

EXECUTIVE SUMMARY

The 2025 parliamentary elections in Albania took place in a political, media, and digital environment that has undergone significant changes compared to previous electoral cycles. Apart from the traditional challenges related to electoral administration, fairness of competition, and financial transparency, these elections were marked by increased exposure to contemporary forms of information manipulation and foreign interference in the information environment. This report conducts an analysis of the systemic vulnerabilities that could be exploited for malign influence in Albania's electoral process, but it does not aim to identify or evidence the presence of foreign interference in every instance.

The analysis shows that the risks associated with foreign information manipulation and interference (FIMI) do not emerge as isolated or episodic phenomena but as the result of the interaction of structural weaknesses in the functioning and implementation of democratic mechanisms. The legal and financial framework of elections, the media and digital environment, the dynamics of political and social discourse, and the cross-border dimension of campaigning and political communication together create a configuration that increases vulnerability to covert influence, coordinated narrative amplification, and contestation of the legitimacy of the electoral process.

One of the report's central findings is that Albania's regulatory architecture provides formal principles for electoral integrity but remains partially unprepared to respond to the realities of modern influence campaigns. The instability of the legal framework, late changes during the electoral cycle, and gaps in the regulation of political financing and digital advertising create uncertainty and functional inequalities in competition. These weaknesses not only have implications for the fairness of electoral competition but also increase the appeal of covert influence through third parties, "surrogate" networks, and non-transparent digital expenditures.

The report notes that financial transparency functions mainly as a procedural, ex post (after the election) mechanism rather than as a genuine accountability tool during the period when financial impact is most relevant (the period before and during the campaign). Delayed reporting, post-election audits, and the lack of inhibitive sanctions foster a culture of formal compliance, resulting in superficial transparency and accountability. From a FIMI perspective, this weakness has dual consequences: on one hand, it creates space for opaque funding and expenditures; on the other hand, it fuels delegitimizing narratives portraying the electoral process as manipulated or captured by malign interests.

The media and digital environment amplifies these risks. The fragmentation of the information space, the polarization of discourse, and the attention-based economic models create conditions in which emotional, antagonistic, or manipulative content spreads faster and at lower cost. The absence of

regulation for online political advertising, the role of influencers, and the use of third-party pages blur the line between transparent political communication and covert influence. These dynamics become even more complex in campaigns targeting the diaspora, where the cross-border nature of digital activity makes it difficult to identify funding sources and secure accountability.

Another significant finding concerns the international dimension of political influence, particularly through lobbying abroad and the use of professional PR and strategic communication services. The absence of a regulatory framework for lobbying and transparency of cross-border activities of political actors creates opportunities for the projection of contested political narratives in the international arena, especially in the post-election period. These practices do not necessarily aim to alter the official election results but seek to influence perceptions, challenge legitimacy, and deepen polarization.

Based on the global methodology developed by the International Institute for Democracy and Electoral Assistance (International IDEA), the report identifies that a significant portion of enablers and drivers of electoral FIMI are present in the Albanian context. The vulnerabilities identified are institutional, regulatory, media, digital, and social in nature, while economic and cross-border drivers make information manipulation not only possible but advantageous. In this context, the risk of FIMI is not related to a single weakness but to the cumulative effect of multiple factors interacting and reinforcing each other.

In conclusion, the report's findings indicate that electoral resilience in Albania remains partial and uneven. The electoral system is better equipped to address classic and formal violations but less capable of confronting hybrid forms of influence that combine non-transparent financing, digital amplification, narrative mediation, and cross-border action. In this sense, FIMI does not appear as an external threat isolated from domestic reality, but as a phenomenon that exploits existing gaps and transforms them into democratic risks.

This report provides an analytical framework for expanding the understanding of these dynamics and reflecting on ways to strengthen electoral integrity and democratic resilience in the future. By documenting the vulnerabilities observed during the 2025 elections, it aims to contribute to a more informed public and institutional debate on protecting electoral processes from information manipulation and foreign interference in an increasingly complex and interconnected environment.

INTRODUCTION

Elections constitute the fundamental mechanism through which citizens exercise their political sovereignty, select their representatives, and hold them accountable while in office. Beyond their procedural role, elections are the primary source of democratic legitimacy, as they enable the peaceful transfer of power and reinforce public trust in state institutions. Consequently, the integrity of electoral processes—grounded in the principles of fair competition, transparency, inclusiveness, and the reliability of public information—is essential for the proper functioning of democracy.

In Albania, these principles are affirmed in the Constitution¹ and the Electoral Code,² which establish that democratic governance relies on free and fair elections, where the vote reflects the will of the citizens. Formally, the Albanian legal framework is largely aligned with basic international standards for democratic elections. Nevertheless, elections are no longer only exposed to traditional risks such as manipulation, pressure, or procedural violations by domestic actors. They increasingly occur in a fragmented, digital, and cross-border information environment, where political influence can be exerted indirectly, covertly, and in ways that are difficult to attribute.

In this context, foreign information manipulation and interference (FIMI) is recognized by scholars as one of the most serious threats to democratic processes globally. According to the European External Action Service (EEAS), FIMI refers to coordinated, manipulative, and intentional actions by foreign actors—state or non-state, including intermediary actors—aimed at negatively shaping the information environment, political processes, and democratic institutions of a country.³ During election periods, such interference can distort public debate, exacerbate polarization, undermine trust in institutions, and, in the post-election phase, contest the legitimacy of electoral outcomes.

Albania is not immune to these threats. Over the past decade, the country has experienced a series of episodes exposing structural vulnerabilities to foreign influence and information manipulation: from questionable lobbying and non-transparent funding, to cyberattacks accompanied by disinformation campaigns, and the use of social media and other media platforms to amplify polarizing narratives. The 2025 parliamentary elections took place in this complex environment, characterized by high political polarization, the rapid transformation of campaigns in the digital space, and a new dimension of outreach targeting

¹ Republic of Albania. (1998). *Kushtetuta e Republikës së Shqipërisë* [Constitution of the Republic of Albania, Law No. 8417, 21 October 1998, as amended]. <https://kqz.gov.al/pdf/kushtetuta-ndryshuar.pdf>

² Republic of Albania. (2008). *Kodi Zgjedhor i Republikës së Shqipërisë* [Electoral Code of the Republic of Albania, Law No. 10 019, 29 December 2008, as amended]. <https://kqz.gov.al/pdf/kodi-zgjedhor.pdf>

³ European External Action Service. (2025). *2024 Report on EEAS Activities to Counter Foreign Information Manipulation and Interference (FIMI)*. <https://www.eeas.europa.eu/sites/default/files/2025/documents/2024%20Report%20on%20EEAS%20Activities%20to%20Counter%20FIMI.pdf>

the diaspora. Investigations into covert and/or non-transparently funded advertisements by third parties, aimed at influencing the diaspora vote, clearly illustrate the difficulties of attribution and ensuring transparency in this space.^{4 5}

At the same time, international assessments of the recent elections in Albania emphasize that, despite some improvements, significant gaps remain that affect fair competition and transparency, including aspects related to campaign financing, media coverage, and the implementation or operationalization of certain previous recommendations.⁶ Therefore, a structured assessment of vulnerabilities to FIMI is essential, not only to understand specific events or illustrative cases, but also to highlight the systemic conditions that make the electoral environment more exposed to information interference and foreign influence.

Purpose and methodology

This report was prepared by BIRN Albania to provide an in-depth, internationally comparable analysis of Albania's vulnerabilities to electoral FIMI, based on the global methodology developed by International IDEA.⁷ This methodology is designed as an analytical tool for national actors—particularly civil society organizations—to understand the conditions that render an electoral process vulnerable to information manipulation and foreign interference, and how these conditions interact with one another.

The International IDEA methodology identifies two main categories of factors:

- enabling factors, which represent structural or institutional conditions that create a favourable environment for FIMI; and
- triggering factors, including economic, political, or operational drivers that make interference advantageous for manipulative actors.

⁴ Likmeta, B. (2025, January 24). Qiellgërvishtës dhe reklama: Fushata e fshehtë në Facebook për votën e Diasporës [Skyscrapers and Social Media: Getting Out the Albanian Vote Abroad]. *Reporter.al*. <https://www.reporter.al/2025/01/24/qiellgervishtes-dhe-reklama-fushata-e-fshehte-ne-facebook-per-voten-e-diaspores/>

⁵ Likmeta, B. (2025, April 12). "Takim ekskluziv": Edi Rama bën fushatë të financuar nga 'palë të treta' me diasporën ["Exclusive meeting": Edi Rama runs a campaign funded by 'third parties' with the diaspora]. *Reporter.al*. <https://www.reporter.al/2025/04/12/takim-ekskluziv-edi-rama-ben-fushate-te-financuar-nga-pale-te-treta-me-diasporen/>

⁶ Organization for Security and Co-operation in Europe's Office for Democratic Institutions and Human Rights (OSCE/ODIHR). (2025). *Republic of Albania: Parliamentary Elections, 11 May 2025 – Final Report*. Warsaw <https://odihr.osce.org/sites/default/files/f/documents/0/c/600028.pdf>

⁷ Sicurella, F. G. & Morača, T. (2025). *Analysing Enablers and Incentives of Election-Related Foreign Information Manipulation and Interference: A Global Methodology*. International IDEA. Stockholm. <https://www.idea.int/publications/catalogue/analysing-enablers-and-incentives-election-related-foreign-information>

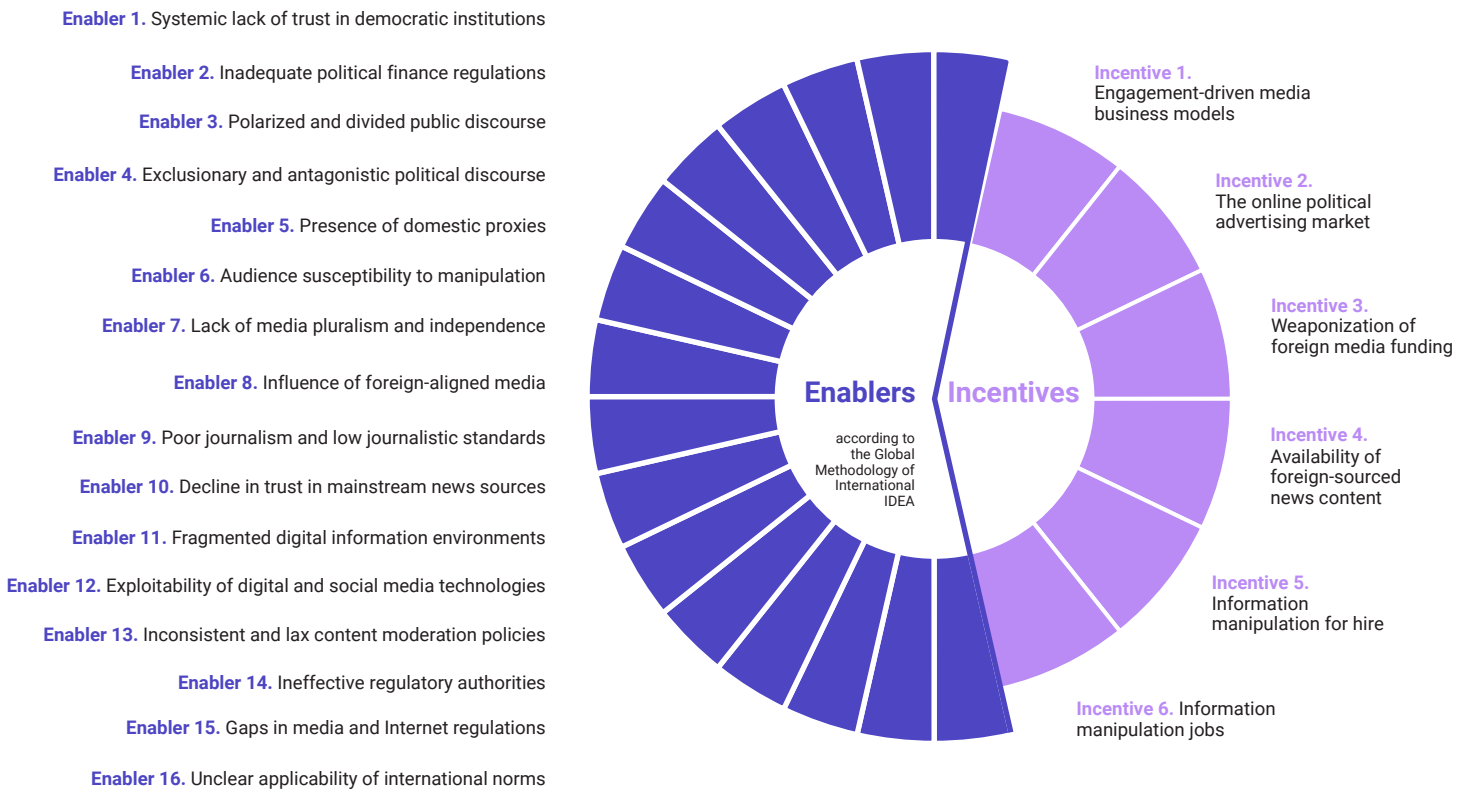
In implementing this methodology, BIRN Albania combined multiple sources and research methods. The analysis draws on literature and primary documents from international organizations—including Organization for Security and Co-operation in Europe's Office for Democratic Institutions and Human Rights (OSCE/ODIHR) reports on the 2025 elections, EEAS documents on FIMI, and the International IDEA methodology—as well as findings from continuous monitoring of the media and digital environment during the pre-election, campaign, and post-election periods. This monitoring allowed for the identification and documentation of concrete practices, verifiable data, and recurring patterns related to vulnerabilities observed during the 2025 elections.

Furthermore, the report uses public sources and investigative journalism to illustrate the gap between formal regulation and the actual functioning of the online influence ecosystem, including cross-border dimensions and campaigns targeting the diaspora. Findings from the literature review were further enriched with data provided by local organizations involved in election monitoring, as well as information provided by the Central Election Commission (CEC). Accordingly, prior to finalizing the report, BIRN Albania organized a validation meeting on 22 December 2025 with these actors at CEC premises.

In this sense, the analytical section of the report should be read as a structural diagnosis of the vulnerabilities that emerged or were confirmed during the 2025 elections.

In this report, BIRN Albania focuses on five thematic domains: i) systemic vulnerabilities of the electoral process and public trust; ii) regulatory framework and party financing; iii) media, regulation, and electoral information; iv) digital space, platforms, and the risk of electoral information manipulation; and v) digitalization of electoral processes and system security.

Moreover, 18 key vulnerabilities were identified and analysed, selected based on their applicability to the Albanian context according to evidence collected during the 2025 electoral cycle. At the end of the analysis for each vulnerability, the report establishes a clear connection with the relevant elements of the International IDEA methodology, specifying which enabling and/or triggering factors are reflected in practice and how these global factors manifest in a contextualized manner in Albania. To guide the reading of the report, the full list of 16 FIMI enabling factors and 6 triggering factors according to International IDEA is presented in the Figure 1 below.

Figure 1: Enablers of election-related FIMI

The methodology provides a structured, risk-assessment analytical framework, but it does not seek to empirically verify the presence, attribution, or measurable impact of foreign influence and information manipulation. Similarly, the report does not aim to empirically demonstrate specific instances of interference; rather, it offers a systemic analysis of the political, institutional, media, and societal context, with the objective of identifying the structural factors that create enabling conditions for potential interference in electoral processes. The analysis focuses on vulnerabilities and on the mechanisms through which external actors, either directly or through domestic intermediary networks, may influence the shaping of public debate, intensify political polarization, and undermine trust in democratic institutions and procedures.

Given that the analysis relies mainly on qualitative approaches and context-dependent interpretation, the report's findings should be understood as an analytical assessment of risk and of the level of institutional preparedness. The ultimate objective is to contribute to a deeper understanding of the dynamics and risks involved, to inform public and institutional debate, and to serve as a foundation for strengthening the democratic resilience of electoral processes in Albania.

MAPPING VULNERABILITIES OF ELECTION-RELATED FIMI IN ALBANIA

The 2025 electoral cycle revealed several structural weaknesses in Albania's electoral process and information environment. This section focuses on the identified "weak points" (regulatory, institutional, financial, media-related, and digital) that include gaps for potential malign interference.

The findings are organized into five analytical areas adapted to the domestic context, each broken down into identifiable and describable vulnerabilities. This structure aims to avoid thematic overlap and to provide a progressive reading: from the principal conditions of electoral integrity and public trust, to the regulatory framework on political finance, the media and digital environments, and the cross-border dimensions that are most evident in digital campaigning (including communication with and targeting of the diaspora).

In this way, this section synthesizes where the main vulnerabilities lie, how they interact, and why they matter in the context of an increasingly digitalized communication ecosystem.

Domain 1

Systemic vulnerabilities of the electoral process and public trust

The electoral process in Albania unfolds within a political and institutional environment characterized by low levels of public trust in institutions, persistent contestation of electoral integrity, and widespread perceptions of informal influences shaping political competition. In the 2025 parliamentary elections, these dynamics were reflected both in pre-election discourse and in the way the electoral process was assessed and interpreted during and after election Day.

Institutional weaknesses and political tensions create an environment in which narratives of unequal competition, manipulation, and lack of legitimacy find fertile ground for dissemination. In this context, information manipulation and potential foreign information interference do not operate in a vacuum; rather, they interact with existing distrust, political polarization, and perceptions of corruption and criminal influence in elections.

This section analyses four core vulnerabilities:

- low trust in institutions;
- assessments of the electoral process and the perceived inequality of the political contest;

- the delegitimization of political competition through disinformation and polarizing discourse; and
- the impact of organized crime and electoral corruption on the electoral process.

Taken together, these vulnerabilities contribute to a political environment in which the electoral process is perceived as contested and exposed to undue influence, thereby increasing susceptibility to information interference aimed at undermining public trust and democratic stability.

Low institutional trust creates fertile ground for election-related FIMI.

Low trust in institutions

Public trust in public institutions in Albania is low and constitutes one of the key vulnerabilities affecting electoral integrity. The European Commission Rule of Law Report (2025) highlights that low levels of institutional trust are fuelled by protracted judicial proceedings, uneven outcomes in accountability processes, and a lack of transparency in the follow-up of allegations against public officials.⁸ Although the report does not conduct an electoral observation in the narrow sense, it underlines that institutional credibility remains particularly fragile in politically sensitive matters—precisely those that, during electoral periods, are used to certify, contest, or delegitimize electoral results and processes. In this regard, weaknesses in the rule of law are not merely an issue of day-to-day governance, but have a direct impact on how the fairness and legitimacy of elections are perceived.

This assessment is reinforced by the European Commission's Albania Country Report (2025), which finds that public trust in democratic institutions remains limited due to perceptions of institutional politicization and the lack of effective accountability for violations.⁹ In such a context, electoral management bodies, judicial institutions and oversight mechanisms are not always perceived as independent arbiters, but rather as actors exposed to political pressure. This situation creates a gap between formal legitimacy and perceived legitimacy: even when procedures are followed, electoral outcomes do not necessarily enjoy societal trust.

International governance and public trust indicators confirm this long-term trend.¹⁰ Indices produced by Transparency International and Freedom House continue to highlight serious concerns related to perceived corruption, institutional capture and the overall quality of democracy. More recent studies

⁸ European Commission. (2025). *Rule of Law Report 2025 – Chapter on Albania*. Strasbourg. https://commission.europa.eu/document/download/3732ae59-5ab4-48a6-a3e6-0ef9aa593863_en

⁹ European Commission. (2025). *Albania 2025 Report*. Brussels. https://enlargement.ec.europa.eu/document/download/fe9138b7-90fe-4277-a12c-3a03f6d1957f_en

¹⁰ Institute for Democracy and Mediation (IDM). (2024). *Trust in Governance 2023 | Annual Public Opinion Poll in Albania*. <https://idmalbania.org/publication-cpt/trust-in-governance-2023-annual-public-opinion-poll-in-albania/>

indicate that even younger cohorts, including youth and first-time voters, exhibit a troubling combination of normative support for democracy and practical distrust in the institutions that administer it.^{11 12} Analyses by the Regional Cooperation Council (RCC) and the Organisation for Economic Co-operation and Development (OECD) on public administration in Albania further emphasize that persistent weaknesses in professionalism, transparency, and accountability continue to erode citizens' trust.^{13 14}

In such an environment, institutional distrust is not merely a contextual feature, but an active factor that increases public susceptibility to delegitimizing narratives, particularly during elections.

This vulnerability is directly linked to **Enabler 1. Systemic lack of trust in democratic institutions**, as defined in the International IDEA methodology. Such an environment of distrust does not in itself generate FIMI, but it structurally enables it by increasing public readiness to accept and amplify manipulative interpretations of the electoral process.

Formal regularity of the electoral process and inequality of the contest

Overall, the parliamentary elections of 11 May 2025 were administered in a largely fair manner and conducted within a framework that allows for “generally free and fair elections”. However, they were accompanied by a series of recurring problems that undermine competition in the race and increase vulnerability to information manipulation. The OSCE/ODIHR captures this duality by noting that the elections were competitive and professionally organized, yet took place without a level playing field, amid concerns regarding the misuse of public resources, pressure on voters and public sector employees, and persistent gaps in the implementation of long-standing OSCE/ODIHR recommendations on electoral reform.¹⁵

Procedural
fairness without
competitive
equality weakens
electoral
resilience.

¹¹ Transparency International. (2025). *Corruption Perceptions Index 2024–2025: Albania*. Berlin. <https://www.transparency.org/en/cpi>

¹² Freedom House. (2025). *Nations in Transit 2025: Albania*. Washington, DC. <https://freedomhouse.org/country/albania/nations-transit/2025>

¹³ Organisation for Economic Co-operation and Development (OECD) (2025). *Public Administration in Albania 2024*. Paris: OECD Publishing. https://www.oecd.org/content/dam/oecd/en/publications/reports/2025/01/public-administration-in-albania-2024_9ec56245/5577d117-en.pdf

¹⁴ Regional Cooperation Council. (2024). *Balkan Barometer 2024: Public Opinion*. Sarajevo. <https://www.rcc.int/download/docs/BB2024-PO.pdf/c29cfed20c3776d280077cdfc2617abc.pdf>

¹⁵ OSCE/ODIHR. (2025). *Republic of Albania: Parliamentary Elections, 11 May 2025 – Final Report*. Warsaw. <https://odhr.osce.org/sites/default/files/f/documents/0/c/600028.pdf>

The same concerns are clearly reflected in the European Commission's findings on Albania, which underline that: while the overall framework enables "generally free and fair" elections, it continues to suffer from recurring shortcomings, including the absence of a level playing field, misuse of public resources, and the fact that electoral reform remained partial and failed to address a number of long-term recommendations.¹⁶

From a FIMI risk perspective, a "procedurally sound" assessment of the electoral process is not sufficient: where political actors and the public perceive the contest as structurally unequal, any incident—even when isolated—has the potential to be transformed into "evidence" for delegitimizing narratives, thereby reducing societal acceptance of electoral outcomes and increasing polarization.

During the 2025 campaign, BIRN monitored and documented a series of practices that translate the "unequal playing field" into a concrete experience for candidates and voters alike. Reports on the use of public administration and state institutions for activities resembling campaigning (for example, events presented as "working meetings", the use of official institutional social media pages for propagandistic communication, or the involvement of senior public officials as part of "electoral machinery") illustrate how institutional advantage is converted into propaganda advantage, with a cascading effect on media coverage and on the ability of other opposition parties to compete on comparable terms.¹⁷

Along similar lines, reporting on so-called "patronage" practices and perceived pressure at the local level shifts the issue from an abstract regulatory debate to a tangible concern related to control and dependency, which directly interacts with citizens' willingness to participate freely and to believe that their vote is "equal".¹⁸

Furthermore, measures with a direct socio-economic impact adopted close to election day, such as the use of the administrative fine "amnesty card" two days before the vote, fuel perceptions that the state and political parties are instrumentally intertwined in pursuit of electoral outcomes. This, in turn, makes it easier for political actors or online networks to produce narratives of "vote-buying/influence" and the "electoral state", regardless of the legal complexity of each individual case.¹⁹

¹⁶ European Commission. (2025). *Albania 2025 Report*. Brussels. https://enlargement.ec.europa.eu/document/download/fe9138b7-90fe-4277-a12c-3a03f6d1957f_en

¹⁷ Erebara, G. (2025, February 20). Miting elektoral i prezantuar si "takim pune", Rama hap fushatën me punëtorët e bashkisë [Electoral rally presented as a "work meeting": Rama launches campaign with municipal employees]. *Reporter.al*. <https://www.reporter.al/2025/02/20/miting-elektoral-i-prezantuar-si-takim-pune-rama-hap-fushaten-me-punetoret-e-bashkise/>

¹⁸ Erebara, G. (2025, May 1). Zgjedhje nën hijen e patronazhistit në Fier [Elections under the shadow of patronage in Fier]. *Reporter.al*. <https://www.reporter.al/2025/05/01/zgjedhje-nen-hijen-e-patronazhistit-ne-fier/>

¹⁹ Gjoka, B. (2025, May 9). Rama luan kartën e faljes së gjobave 2 ditë para zgjedhjeve [Rama plays the amnesty card for fines 2 days before the elections]. *Reporter.al*. <https://www.reporter.al/2025/05/09/rama-luan-karten-e-faljes-se-gjobave-2-dite-para-zgjedhjeve/>

Together, these elements shift the assessment of “free and fair elections” from a purely procedural question to one of public legitimacy. The wider the gap between formal rules and the lived experience of inequality on the ground, the higher the vulnerability to information manipulation.

Another layer of this vulnerability relates to the independence and effectiveness of institutions tasked with oversight of these processes. The European Commission notes that political polarization and politicization in appointments to independent institutions remain problematic, while parliamentary oversight of the executive is weak—conditions that, inter alia, undermine perceptions of institutional neutrality during electoral periods.²⁰

In practice, this context creates an opportunity for stakeholders to frame any decision, delay, or procedural interpretation as politically motivated. This dynamic is directly connected to the logic of FIMI: when standards are perceived as unclear or unevenly applied, manipulative information does not need to demonstrate a specific fraud; it is sufficient to raise suspicion that “the system is captured”.

This vulnerability primarily intersects with **Enabler 1. Systemic lack of trust in democratic institutions** and **Enabler 2. Inadequate political finance regulations**. The use of state resources, administrative pressure, and the uneven implementation of campaign rules contribute to the perception that political competition does not take place on a level playing field. Even when formal procedures are respected, the gap between legal regulation and practice fuels public suspicion regarding the integrity of the process. This gap creates favourable conditions for information manipulation, as real or perceived incidents are used to support narratives that elections are predetermined or manipulated.

The illustrative case below demonstrates how weaknesses in electoral administration, communication, and dispute resolution during the 2025 post-election phase transformed a formally legal process into a prolonged source of uncertainty and public mistrust, creating space for contestation and delegitimizing narratives about the electoral process.

²⁰ European Commission. (2025). *Albania 2025 Report*. Brussels. https://enlargement.ec.europa.eu/document/download/fe9138b7-90fe-4277-a12c-3a03f6d1957f_en

Illustrative case: Contestation of election results and the recount process

During the 2025 parliamentary elections, the main vulnerability to information manipulation was not related to a single incident, but rather to the prolonged and unclear dynamics of the post-election phase. Delays in counting the diaspora votes, a high volume of complaints, fragmented institutional decision-making, and selective recounts created an extended cycle of procedural uncertainty, which was directly reflected in public debate and exploited to advance delegitimizing narratives against the electoral process.²¹

The protraction of the counting process,²² accompanied by a lack of clear institutional communication, augmented the space for speculation and doubts about the integrity of the elections. Politically articulated complaints and their withdrawal following signals from political party leadership²³ reinforced perceptions of the politicization of legal mechanisms. Recounts, although technically justified, were perceived as a continuation of the political contestation, keeping the result “open” to dispute.²⁴

The discovery of concrete discrepancies during the recount process in the Fier region, although localized, became symbolic evidence for broader narratives of systemic manipulation, while relativizing responses further fuelled public cynicism. Even after the certification of results,²⁵ ²⁶ the persistence of complaints and institutional criticism highlighted the gap between formal legitimacy and perceived legitimacy.²⁷ ²⁸

Overall, the case shows how procedural weaknesses and shortcomings in public communication during the post-election phase, in a context of polarization and low institutional trust, can easily turn into vulnerabilities, creating favourable ground for information manipulation and the erosion of public trust in the electoral process.

²¹ Gjoka, B. (2025, August 28). Certifikohet rezultati i zgjedhjeve, por kontestimet vazhdojnë [Election results certified, but disputes continue]. *Reporter.al*. <https://www.reporter.al/2025/08/28/certifikohet-rezultati-i-zgjedhjeve-por-kontestimet-vazhdojne/>

²² Gjoka, B. (2025, June 17). Rinumërimi i kutive të 11 majit do të zgjasë deri në korrik [Recount of May 11 ballot boxes to continue until July]. *Reporter.al*. <https://www.reporter.al/2025/06/17/rinumerimi-i-kutive-te-11-majit-do-te-zgjase-deri-ne-korrik/>

²³ Gjoka, B. (2025, May 20). Pas mesazhit të Ramës, kandidatët e PS tërhiqen nga ankesat për votat [After Rama's message, PS candidates withdraw complaints over votes]. *Reporter.al*. <https://www.reporter.al/2025/05/20/pas-mesazhit-te-rames-kandidatet-e-ps-terhiqen-nga-ankesat-per-votat/>

²⁴ Hoxhaj, E. (2025, May 15). Numërimi i votës së diasporës kthehet në një maratonë [Diaspora vote counting turns into a marathon]. *Reporter.al*. <https://www.reporter.al/2025/05/15/numerimi-i-votes-se-diaspores-kthehet-ne-nje-maratone/>

²⁵ Gjoka, B. (2025, September 1). PD kërkon anulimin e rezultatit të 11 majit në Kolegjin Zgjedhor [PD seeks annulment of May 11 results at Electoral College]. *Reporter.al*. <https://www.reporter.al/2025/09/01/pd-kerkon-anulimin-e-rezultatit-te-11-majit-ne-kolegjin-zgjedhor/>

²⁶ Gjoka, B. (2025, October 7). Opozita kritikon rolin e KQZ në zgjedhjet e 11 majit [Opposition criticizes CEC's role in May 11 elections]. *Reporter.al*. <https://www.reporter.al/2025/10/07/opozita-kritikon-rolin-e-kqz-ne-zgjedhjet-e-11-majit/>

²⁷ Gjoka, B. (2025, July 2). Rinumërimi në Fier zbulon trafikim votash brenda listave të hapura të PS dhe PD [Recount in Fier reveals vote trafficking within PS and PD open lists]. *Reporter.al*. <https://www.reporter.al/2025/07/02/rinumerimi-ne-fier-zbulon-trafikim-votash-brenda-listave-te-hapura-te-ps-dhe-pd/>

²⁸ Karaj, V. (2025, July 2). Balluku fajëson lodhjen e numëruesve për tjetërsimin e qindra votave në Fier [Balluku blames the fatigue of the counters for the misappropriation of hundreds of votes in Fier]. *Reporter.al*. <https://www.reporter.al/2025/07/02/balluku-fajeson-lodhjen-e-numeruesve-per-tjetersimin-e-qindra-votave-ne-fier/>

Delegitimization of political competition through disinformation and polarizing discourse

Structural polarization amplifies delegitimizing disinformation.

The 2025 parliamentary elections took place in an environment where public debate was characterized by deep political polarization, information fragmentation, and a deeply rooted culture of antagonistic communication. The OSCE/ODIHR report notes that political competition unfolded in a climate where exclusionary rhetoric, personal attacks, and delegitimizing narratives often replaced programmatic debate, while voters' access to independent and diverse information was constrained by a concentrated and politically dependent media environment.²⁹ Along the same lines, the European Commission report finds that political polarization and the lack of constructive dialogue continue to undermine the quality of the democratic process, affecting not only institutional functioning but also public perceptions of the legitimacy of political actors and of the elections themselves.³⁰

This polarized discourse is not episodic but structural and deeply embedded. The legacy of the totalitarian period, characterized by loyalty to the leader, political patronage, and the binary divide of “us versus them”, has produced a public discourse in which many political, social, or institutional issues are filtered through partisan identity. These issues include EU integration, judicial reform, corruption, religious identity, gender equality and LGBTQ+ rights, regularly become emotionally charged flashpoints that political actors and digital intermediaries use for mobilization, polarization, and discrediting.

Qualitative analysis of audiovisual media monitoring during the election campaign shows that political talk shows and debate formats contributed to this fragmentation through confrontational elements, the selection of a limited number of actors, and the framing of issues as moral or identity clashes rather than as policy-based political debates.³¹ Instead of functioning as spaces for pluralism and informational mediation, many media formats reproduced and amplified existing divisions, normalizing a language of delegitimization and leaving little space for alternative actors, smaller parties, or critical voices. A similar trend was observed in online media, where coverage was dominated by political statements, counter-statements, and opinions, often detached from factual verification and broader political context.³² This type of coverage created “narrative islands” and reinforced a logic of fragmented information provision, in which audiences are primarily exposed to content that confirms their existing beliefs.

²⁹ OSCE/ODIHR. (2025). *Republic of Albania: Parliamentary Elections, 11 May 2025 – Final Report*. Warsaw. <https://odhr.osce.org/sites/default/files/f/documents/0/c/600028.pdf>

³⁰ European Commission. (2025). *Albania 2025 Report*. Brussels. https://enlargement.ec.europa.eu/document/download/fe9138b7-90fe-4277-a12c-3a03f6d1957f_en

³¹ Voko, K., Lelo, E., & Shehu, J. (2025). *Audiovisual Media Monitoring : Albania's Parliamentary Elections 2025*. BIRN Albania. Tirana. <https://birn.eu.com/wp-content/uploads/2025/12/Audiovisual-Media-Monitoring-ENG.pdf>

³² Voko, K., Babameto, S. & Keta, V. (2025). *Online Media Monitoring: Albania's Parliamentary Elections 2025*. BIRN Albania. Tirana. <https://birn.eu.com/wp-content/uploads/2025/12/Online-Media-Monitoring-ENG.pdf>

This tense public debate climate directly interacts with other factors that increase public susceptibility to manipulation, such as low levels of media literacy. According to the Media Literacy Index 2023, Albania ranks among the European societies least resilient to disinformation, reflecting low levels of critical media skills, limited interpersonal and institutional trust, and a media environment with restricted freedom.³³ NATO studies and regional analyses show that Albanian audiences display predispositions towards authority, confirmation of existing beliefs and “us versus them” narratives, which can be exploited by domestic or foreign actors to amplify polarizing and delegitimizing messages.³⁴ In this sense, polarizing discourse is not merely a problem of political communication, but a key enabler of FIMI, making the public sphere more receptive and vulnerable to disinformation and emotional manipulation.

The structure of the media market further deepens this vulnerability. According to the European Commission and the Media Pluralism Monitor, high concentration of media ownership, lack of transparency in financing, and the intertwining of political and economic interests have weakened media pluralism and editorial independence in Albania.³⁵ OSCE/ODIHR emphasizes that during the 2025 elections, voters’ access to independent and diverse information was undermined by media dependence on political and business interests, as well as by repeated violations of rules on political advertising and election coverage.³⁷ In this environment, media outlets not only reflect polarizing discourse but often become active participants in it, reducing the public’s ability to distinguish between information, opinion, and propaganda.

In this fragmented and polarized landscape, new political actors and women in politics were particularly exposed to delegitimizing narratives. The dominant discourse, structured around the two main political poles (political parties), left little space for new alternatives and framed them as inauthentic, suspicious, or threatening to the existing order, opening the way for disinformation campaigns in media and online. Similarly, existing gender inequalities in participation in the public sphere and representation were reinforced by a public discourse in media and online that employed stereotypes, insinuations, and personal attacks to delegitimize women candidates, particularly when they gained visibility.

³³ Open Society Institute – Sofia. (2023). *Media Literacy Index 2023: Measuring Vulnerability of Societies to Disinformation*. Sofia. <https://osis.bg/wp-content/uploads/2023/06/MLI-report-in-English-22.06.pdf>

³⁴ Doncheva, T. & Svetoka, S. (2021). *Russia's Footprint in the Western Balkan Information Environment: Susceptibility to Russian Influence*. NATO Strategic Communications Centre of Excellence. Riga. <https://stratcomcoe.org/publications/russias-footprint-in-the-western-balkan-information-environment-susceptibility-to-russian-influence/216>

³⁵ European Commission. (2025). *Albania 2025 Report*. Brussels. https://enlargement.ec.europa.eu/document/download/fe9138b7-90fe-4277-a12c-3a03f6d1957f_en

³⁶ Likmeta, B. & Voko, K. (2025). *Monitoring Media Pluralism in the European Union: Results of the MPM2025. Country Report: Albania*. European University Institute, Centre for Media Pluralism and Media Freedom (CMPF). Florence. <https://cadmus.eui.eu/entities/publication/f5be0d78-00ae-4b29-aadb-b487390fcbf2>

³⁷ OSCE/ODIHR. (2025). *Republic of Albania: Parliamentary Elections, 11 May 2025 – Final Report*. Warsaw. <https://odhr.osce.org/sites/default/files/f/documents/0/c/600028.pdf>

This vulnerability corresponds directly to **Enabler 3. Polarized and divided public discourse** and **Enabler 4. Exclusionary and antagonistic political discourse** in the International IDEA methodology. Deep polarization and an antagonistic culture of political communication create an environment in which the delegitimization of opponents is perceived as a normal practice of political competition. In this context, disinformation, reputational attacks, and exclusionary narratives—particularly against new political actors and women in politics—find fertile ground for circulation and acceptance. Polarizing discourse is not merely a contextual feature, but an active mechanism that lowers resilience to information manipulation during election campaigns. The illustrative cases below show how these dynamics were not isolated incidents, but concrete manifestations of a structural vulnerability, in which polarization, disinformation, and lack of media pluralism intertwined to undermine the integrity of political competition during the 2025 parliamentary elections.

Illustrative case: Disinformation campaigns in the digital space against new political actors

During the 2025 parliamentary campaign, BIRN Albania documented a recurring pattern of anonymous digital attacks against new political actors, characterized by manipulative claims, coordinated amplification of harmful content, and abuse of platform moderation mechanisms. Although the perpetrators were not publicly identified, the methods were consistent, sustained over time, and deployed across multiple platforms, suggesting a consolidated practice of delegitimization through disinformation.

In January 2025, an anonymous Instagram page targeted the new party *Levizja Bashke* (Together Movement) through content disguised as satire, but aimed at portraying the movement and its leadership as unserious or morally compromised.³⁸ In April, the same mechanisms were used against *Partia Mundesia* (Opportunity Party), through anonymous Facebook profiles that spread false accusations or insinuations about “hidden agendas”, framing the party as a covert project serving opaque interests.³⁹ Similar attacks were also identified against *Nisma Shqiperia Behet* (The Albania Becomes Initiative), through personal targeting of its political figures and the reproduction of the same delegitimizing framing across several accounts.⁴⁰

The use of digital attacks continued after the elections, when the temporary blocking of the Facebook account of *Arlind Qori*, leader of *Levizja Bashke*, was reported following coordinated false reporting.⁴¹ This demonstrated a shift from attempts to influence public opinion to the actual disruption of a political actor’s communication channel, through the exploitation of weaknesses in platforms’ automated systems. The latter often failed to identify the manipulative methods used for disinformation and censorship.

BIRN reporting also shows that similar tactics were used against the ruling Socialist Party, through an accusation that received high attention and circulated during the campaign but was later debunked through source verification. This parallel case shows that delegitimization through false claims with unclear attribution, relying on virality to precede accountability, constitutes a transversal mechanism of information manipulation that is not limited solely to new political actors.⁴²

³⁸ Likmeta, B. (2025, January 31). “Kukull me çorape”: Faqja anonime në Instagram shpërndan dezinformimin për *Lëvizjen Bashkë* [“Doll with socks”: Anonymous Instagram page spreads disinformation about *Lëvizja Bashkë*]. *Reporter.al*. <https://www.reporter.al/2025/01/31/kukull-me-corape-faqja-anonime-ne-instagram-shperndan-dezinformimin-per-levizjen-bashke/>

³⁹ Karaj, V. (2025, April 1). Profili anonim në Facebook shpërndan dezinformim kundër partisë “*Mundësia*” [Anonymous Facebook profile spreads disinformation against the “*Mundësia*” party]. *Reporter.al*. <https://www.reporter.al/2025/04/01/profili-anonim-ne-facebook-shperndan-dezinformim-kunder-partise-mundesia/>

⁴⁰ Karaj, V. (2025, April 4). Profilët anonime targetojnë edhe drejtuesit e “*Nisma Shqipëria Bëhet*” [Anonymous profiles also target leaders of “*Nisma Shqipëria Behet*”]. *Reporter.al*. <https://www.reporter.al/2025/04/04/profilet-anonime-targetojne-edhe-drejtuesit-e-nisma-shqiperia-behet/>

⁴¹ Karaj, V. (2025, May 20). Llogaria Facebook e *Arlind Qorit* u bllokua pas “sulmit” me raporte të rreme [Arlind Qori’s Facebook account blocked after “attack” with fake reports]. *Reporter.al*. <https://www.reporter.al/2025/05/20/llogaria-facebook-e-arlind-qorit-u-bllokua-pas-sulmit-me-raporte-te-rreme/>

⁴² Karaj, V. (2025, April 4). Kush fshihet pas akuzave të PD se “*Edi Rama* zotëron një orë me vlerë 1.4 milionë euro” [Who is behind PD’s accusations that “*Edi Rama* owns a €1.4 million watch?”]. *Reporter.al*. <https://www.reporter.al/2025/04/04/kush-fshihet-pas-akuzave-te-pd-se-edi-rama-zoteron-nje-ore-me-vlere-1-4-milione-euro/>

Overall, these cases highlight a widespread form of suppression of political competition through disinformation, built on delegitimizing narratives, anonymity and digital manipulation, which increased the costs and challenges of participation, particularly for new political actors, in an environment of low trust and high polarization.

Illustrative case: Gender-based disinformation and unequal participation in the 2025 elections

The 2025 parliamentary elections in Albania demonstrated that gender-based disinformation constitutes a structural electoral vulnerability that amplifies existing inequalities and distorts political competition. Women entered the race under unequal conditions: they accounted for 38.7% of candidates and were unevenly positioned on electoral lists. Women candidates received significantly fewer votes in open lists compared to men (26.4% versus 73.6%).

Campaign monitoring showed that women were seriously underrepresented in the media, accounting for only 9.9% of news coverage, 24.7% in political talk shows and 8.6% in live broadcasts. This low level of visibility limited their ability to shape public discourse and to respond to hostile narratives, making gender-based disinformation more effective as a mechanism of delegitimization—not as an isolated phenomenon, but as a multiplication of already existing exclusion.⁴³

In the online environment, women were exposed to higher levels of abusive and denigrating content, focused not on their political positions or actions, but on personal attributes, morality, and gender roles. These narratives generally did not aim to persuade voters, but rather to damage credibility and discourage political participation.

The effects were cumulative: the greater the visibility of women candidates, the more intense the attacks became. Monitoring documented sustained online abuse and coordinated harassment, particularly on social media, leading many women candidates to limit their public engagement.⁴⁴ These dynamics also shaped broader societal perceptions, reinforcing distrust and signalling that women's political participation is associated with high personal costs.

From a FIMI perspective, these data show that gender-based disinformation simultaneously exploits unequal representation, asymmetric media space, weak

⁴³ UN Women Albania, EDM & BIRN Albania. (2025). *Media Narratives, Visibility, Inequality and Gender-Based Violence in Politics during 2025 Elections*. Women in Politics 2025 Factsheet. https://albania.unwomen.org/sites/default/files/2025-12/en_women_in_politics_factsheet_web.pdf

⁴⁴ Karaj, V. (2025, June 6). Pas perdes së fushatës: Gratë kandidate u sulmuan me gjuhë seksiste dhe denigruese [Behind the campaign curtain: Women candidates attacked with sexist and denigrating language]. *Reporter.al*. <https://www.reporter.al/2025/06/06/pas-perdes-se-fushates-grate-kandidate-u-sulmuan-me-gjuhe-seksiste-dhe-denigruese/>

platform accountability, and polarized discourse. It functions as a systemic vulnerability, increasing the cost of participation for women, narrowing electoral pluralism, and undermining democratic legitimacy.

Perceived
electoral
corruption fuels
narratives of
democratic
capture.

The impact of organized crime and corruption on the electoral process

The 2025 parliamentary elections took place in a context in which the intertwining of politics, corruption and informal influences, including organized crime, remained a persistent concern for the integrity of the electoral process. Although the responsible institutions undertook certain steps to prevent and investigate electoral crimes, international reports and domestic assessments emphasize that public perceptions regarding the influence of informal actors and limited accountability continue to undermine trust in the electoral contest. This gap between institutional action and societal trust creates particularly favourable ground for delegitimizing rhetoric and information manipulation.

The OSCE/ODIHR report notes that, although the elections were administered in a generally orderly manner, allegations of vote buying, voter pressure, and the involvement of criminal actors remained present in public discourse, particularly in areas of the country with a high influence of criminal groups. The report underlines that such allegations, regardless of whether they are conclusively proven or not, have a direct impact on perceptions of the level playing field and on the acceptance of election results, especially in a politically polarized environment.⁴⁵ Along the same lines, the European Commission highlights that corruption and informal interference in electoral processes remain a structural risk, while progress in their effective sanctioning is perceived as slow and uneven, negatively affecting public trust.⁴⁶

At the national level, the role of the Special Structure against Corruption and Organized Crime (SPAK) has been identified as key to safeguarding electoral integrity. In February 2025, SPAK published a dedicated strategy for the investigation and prevention of electoral crimes, with objectives including early identification of criminal offences, prevention of corruption, increased public awareness, and cooperation with the Central Election Commission, the media, and civil society.⁴⁷ However, the strategy itself and SPAK's public statements highlight significant challenges, such as potential political pressure, procedural

⁴⁵ OSCE/ODIHR. (2025). *Republic of Albania: Parliamentary Elections, 11 May 2025 – Final Report*. Warsaw. <https://odihr.osce.org/sites/default/files/f/documents/0/c/600028.pdf>

⁴⁶ European Commission. (2025). *Albania 2025 Report*. Brussels. https://enlargement.ec.europa.eu/document/download/fe9138b7-90fe-4277-a12c-3a03f6d1957f_en

⁴⁷ Hoxhaj, E. (2025, January 29). SPAK ngrë një strukturë hetimore të posaçme për krimet zgjedhore [SPAK establishes a special investigative structure for electoral crimes]. *Reporter.al*. <https://www.reporter.al/2025/01/29/spak-ngre-nje-strukture-hetimore-te-posacme-per-krimet-zgjedhore/>

delays, media disinformation, and difficulties in investigating violations related to diaspora voting and foreign interference, underscoring that the protection of electoral integrity requires coordinated institutional action.⁴⁸

News analyses and investigations by BIRN in the regions Durres, Elbasan, Dibra and other districts show, through empirical examples, that organized crime functions as an “invisible actor” in elections, exerting influence through local networks, intimidation, vote brokerage, or selective support for candidates.^{49 50} In parallel, cases involving candidates under investigation for corruption and clashes between politics and the judiciary highlighted an additional dimension of vulnerability: the normalization of the presence of problematic figures in the race, shifting public debate away from integrity standards towards political conflicts over the legitimacy of justice institutions.⁵¹

From a FIMI perspective, what is critical is not only the existence of these phenomena, but the way they are translated into public narratives. The high volume of criminal proceedings for electoral crimes—for example, dozens of cases registered and dozens more still under investigation after the elections—without swift and clear final outcomes, fuels perceptions of impunity.^{52 53} This creates a space in which any local incident or partial finding can easily be transformed into “evidence” of systemic manipulation, amplified by political actors, politically aligned media or anonymous profiles, and pages on social media.

In this sense, the impact of organized crime and electoral corruption constitutes a structural vulnerability to FIMI: it lowers trust in institutions, relativizes election results, and makes the public more receptive to narratives that delegitimize the democratic process. Even when institutions respond, insufficient transparency and delays in sanctioning weaken the impact of measures, leaving the information space exposed to manipulation.

⁴⁸ Hoxhaj, E. (2025, February 21). Strategjia e SPAK kundër korrupsionit zgjedhor dhe përfshirjes së krimit të organizuar [SPAK's strategy against electoral corruption and organized crime involvement]. *Reporter.al*. <https://www.reporter.al/2025/02/21/strategjia-e-spak-kunder-korrupsionit-zgjedhor-dhe-perfshirjes-se-krim-it-organizuar/>

⁴⁹ Bogdani, A. (2025, May 8). Krimi i organizuar, “partia e padukshme” e zgjedhjeve në Durrës [Organized crime, the “invisible party” of the elections in Durres]. *Reporter.al*. <https://www.reporter.al/2025/05/08/krimi-i-organizuar-partia-e-padukshme-e-zgjedhjeve-ne-durres/>

⁵⁰ Emiri, G. (2025, May 11). Krimi i organizuar “orientoi” votën në Durrës [Organized crime “directed” the vote in Durres]. *Reporter.al*. <https://www.reporter.al/2025/05/11/krimi-i-organizuar-orientoi-voten-ne-durres/>

⁵¹ Karaj, V. (2025, April 21). “Politika” sfidon drejtësinë me kandidatët nën hetim për çështje korrupsioni [“Politics challenges justice” with candidates under investigation for corruption]. *Reporter.al*. <https://www.reporter.al/2025/04/21/politika-sfidon-drejtisine-me-kandidatet-nen-hetim-per-ceshtje-korrupsioni/>

⁵² Hoxhaj, E. (2025, May 9). Regjistrohën 58 çështje penale për krime zgjedhore, nga të cilat 37 për korrupsion në zgjedhje [58 criminal cases for electoral crimes registered, 37 related to electoral corruption]. *Reporter.al*. <https://www.reporter.al/2025/05/09/regjistrohene-58-ceshtje-penale-per-krime-zgjedhore-nga-te-cilat-37-per-korrupsion-ne-zgjedhje/>

⁵³ Barjamemaj, A. (2025, June 26). Dumani thotë se 43 procedime për krime zgjedhore janë ende në hetim [Dumani says 43 procedures for electoral crimes are still under investigation]. *Reporter.al*. <https://www.reporter.al/2025/06/26/dumani-thote-se-43-procedime-per-krime-zgjedhore-jane-ende-ne-hetim/>

This vulnerability is primarily linked to **Enabler 1. Systemic lack of trust in democratic institutions** and **Enabler 6. Audience susceptibility to manipulation**. The presence of allegations of electoral corruption, the involvement of organized crime in elections and the high number of criminal proceedings—accompanied by protracted investigations and limited outcomes—fuel the perception that electoral violations are not effectively sanctioned. This perception increases public distrust and makes audiences more inclined to believe narratives portraying elections as captured or controlled by criminal interests.

Domain 2

Regulatory framework and political party financing

The regulatory and financial framework governing elections in Albania defines the rules of political competition, the transparency of financial resources, and the mechanisms of institutional oversight. In the 2025 parliamentary elections, this framework was characterized by normative instability, late legal amendments, and persistent gaps in the regulation and enforcement of political financing.

Although a formal legal architecture exists, practice shows that the regulatory design and its enforceability have not been fully adapted to the realities of contemporary campaigns, particularly with regard to digital financing, the role of third parties, and the cross-border dimensions of political communication. This creates space for structural inequalities, a lack of transparency, and unattributed influence—elements that are particularly sensitive from the FIMI perspective.

This domain focuses on three main vulnerabilities:

- the instability of the regulatory framework and late legal amendments that reconfigure the parameters of electoral competition;
- gaps in the regulation and enforcement of political party and campaign financing, including third-party involvement and digital spending; and
- the lack of full alignment with European and international standards on transparency, online political advertising, and cross-border activities.

Taken together, these vulnerabilities create a regulatory environment in which financial and narrative influence can be exercised in a concealed manner, undermining the level playing field and increasing the risk of information manipulation during and after elections.

Unstable regulatory framework and delayed reforms

Frequent and late electoral reforms erode regulatory certainty and effective oversight.

The Electoral Code of the Republic of Albania has undergone frequent amendments over the years, primarily through bipartisan processes that, in principle, have sought political consensus and broad legitimacy. In some cases, these processes have also been accompanied by attempts to consult other stakeholders, including civil society organizations and international partners. However, independent assessments indicate that such efforts have often been formal, fragmented, or time-constrained, resulting in minimal outcomes or failing to address comprehensively the structural problems of the electoral system. Electoral reform processes in recent years have been characterized by a lack of trust among political actors, interruptions in dialogue, and a widespread public perception that reforms are used more as bargaining instruments than as mechanisms for the sustainable improvement of electoral integrity.⁵⁴

Amendments adopted during 2024–2025 clearly illustrate this predicament. Legal interventions related to out-of-country voting (the diaspora) reshaped the procedures and deadlines for voter registration and vote administration, adding institutional complexity at a critical stage of the electoral process.⁵⁵ In parallel, the February 2025 amendments directly affected electoral financing and communication: the ceiling for candidates' self-financing was significantly increased (from ALL 1 million to ALL 3 million), the maximum campaign spending limits were expanded, and a legal ambiguity was introduced by excluding candidates' expenditures from the overall spending cap applicable to electoral contestants (political parties), without establishing a separate cap for candidates. These changes were adopted only a few months before the elections and were accompanied by an increase in allowed television advertising time, substantially reconfiguring the financial and media parameters of the electoral competition.⁵⁶

⁵⁴ Gjoka, B. (2025, November 18). Reforma zgjedhore, palët nisin punën me mosbesim [Electoral reform, parties start work with mistrust]. *Reporter.al*. <https://www.reporter.al/2025/11/18/reforma-zgjedhore-palet-nisin-punen-me-mosbesim/>

Gjoka, B. (2024, February 6). "Skenar": Shoqëria civile mosbesuese ndaj politikës për reformën zgjedhore ["Scenario": Civil society distrustful of politics on electoral reform]. *Reporter.al*. <https://www.reporter.al/2024/02/06/skenar-shoqeria-civile-mosbesuese-ndaj-politikes-per-reformen-zgjedhore/>

Gjoka, B. (2024, January 26). Komisioni i reformës zgjedhore, "Rama–Basha" nis punën online [Electoral reform commission, "Rama–Basha" start work online]. *Reporter.al*. <https://www.reporter.al/2024/01/26/komisioni-i-reformes-zgjedhore-rama-basha-nis-punen-online/>

Gjoka, B. (2024, June 28). Dialogu PS–PD për reformën zgjedhore drejt dështimit [PS–PD dialogue on electoral reform heading to failure]. *Reporter.al*. <https://www.reporter.al/2024/06/28/dialogu-ps-pd-per-reformen-zgjedhore-drejt-deshhtimit/>

Gjoka, B. (2024, March 21). Përfundon pa rezultat komisioni bipartizan për reformën zgjedhore [Bipartisan commission on electoral reform ends without results]. *Reporter.al*. <https://www.reporter.al/2024/03/21/perfundon-pa-rezultat-komisioni-bipartizan-per-reformen-zgjedhore/>

Erebara, G. (2024, March 2). Ndërsa zgjedhjet afrohen, partitë parlamentare duken jo serioze në nismën për të reformuar Kodin Zgjedhor, thonë organizatat [As elections approach, parliamentary parties appear unserious in initiative to reform Electoral Code, say organizations]. *Reporter.al*. <https://www.reporter.al/2024/03/02/ndersa-zgjedhjet-afrohen-partite-parlamentare-duken-jo-serioze-ne-nismen-per-te-reformuar-kodin-zgjedhor-thone-organizatat/>

⁵⁵ Venice Commission. (2025). *Albania: 2024 and 2025 Amendments to the Electoral Code*. Strasbourg. <https://www.venice.coe.int/webforms/documents/default.aspx?pdffile=CDL-REF%282025%29029-e>

⁵⁶ Barjamemaj, A. (2025, February 11). PS–PD miratojnë së bashku rritjen e financimeve dhe kohës televizive në fushatë [PS–PD jointly approve increase in campaign funding and TV time]. *Reporter.al*. <https://www.reporter.al/2025/02/11/ps-pd-miratojne-se-bashku-rritjen-e-financimeve-dhe-kohes-televizive-ne-fushate/>

The OSCE/ODIHR final report notes that, while some joint recommendations of ODIHR and the Venice Commission were addressed (such as changes to the national threshold for independent candidates or the removal of the possibility of running in multiple electoral districts), a significant number of long-standing recommendations remain unaddressed. These include the composition of lower-level election commissions, interim campaign finance reporting, the extension of campaign finance rules to third parties, and guarantees for independent and pluralistic media coverage. The failure to address these recommendations underscores a persistent lack of political will for comprehensive reform and reinforces the gap between international standards and domestic regulatory practice.⁵⁷

This vulnerability is directly linked to **Enabler 14. Ineffective regulatory authorities**, as frequent and late amendments make consistent enforcement and coherent oversight of electoral rules more difficult. At the same time, it interacts with the economic incentives of the political advertising ecosystem, particularly within the unregulated or weakly supervised digital environment, where higher spending limits and regulatory ambiguities increase the attractiveness of covert or intermediated influence through “surrogate” actors.

Gaps in the regulation of political parties and campaign financing

Weak financial transparency permits unattributed electoral influence.

The political financing framework in Albania is primarily governed by the Electoral Code and the Law on Political Parties. Although some partial amendments have been introduced in recent years, no comprehensive reforms have taken place since 2020, and the basic structure of the system remains unchanged. As a result, the current framework continues to produce limited transparency and functional inequalities in the electoral competition, undermining the level playing field between parties and candidates.

A core weakness of this system is its near-total reliance on post-election reporting and ex post auditing, which significantly restricts transparency during the period when financial influence is most intense. As highlighted in BIRN Albania's Working Paper on preventing foreign interference, the law requires the submission of financial reports only after the conclusion of the electoral process and does not mandate periodic or “real-time” reporting during the campaign. This creates structural gaps in the traceability of funds and expenditures, including those related to digital communication and online political advertising.⁵⁸

⁵⁷ OSCE/ODIHR. (2025). *Republic of Albania: Parliamentary Elections, 11 May 2025 – Final Report*. Warsaw. <https://odhr.osce.org/sites/default/files/f/documents/0/c/600028.pdf>

⁵⁸ BIRN Albania. (2025). *Working Paper: Preventing Foreign Interference in Democratic and Electoral Processes in Albania*.

The OSCE/ODIHR report on the 2025 elections confirms this issue. It emphasizes that key long-standing recommendations on campaign financing remain unaddressed, including the lack of interim reporting during campaigns, the absence of effective mechanisms to ensure disclosure of donations and loans, and serious concerns regarding the effectiveness of audits. According to ODIHR, these gaps directly affect transparency and the equality of opportunity for parties and candidates, rendering the framework not only formal but also functionally ineffective in practice.⁵⁹

The problem is further compounded in the FIMI context, because electoral influence does not necessarily materialize through direct funding of political parties. Instead, it often occurs through third parties, paid communication networks, political marketing firms, “surrogate” pages, influencers, or intermediaries purchasing online advertising without clear financial attribution.⁶⁰ The current framework does not adequately regulate these actors, either in terms of financing transparency or reporting and auditing of their expenditures, as demonstrated by the practices analysed in the following sections.

In this sense, the weakness is not only regulatory but also structural and cultural. Although the law imposes reporting and auditing obligations under the supervision of the CEC, the practice in the last two electoral cycles shows that many parties and candidates treat these obligations as formalities, with low cost for non-compliance and no real consequences for participation in subsequent elections. In the absence of effective sanctions and given selective or delayed enforcement, financial transparency becomes a formal documentation exercise that produces a “paper trail”, but not necessarily genuine accountability.

This situation has also prompted ongoing discussions about the need to revise the Electoral Code and the Law on Political Parties. The public discourse associated with the European integration process has reflected pressure to strengthen the prohibition of funding from criminal or foreign sources and to enhance the financial transparency of political parties, including debates over a new political financing law aligned with EU standards.⁶¹ Nevertheless, despite these signals and political or strategic commitments, by the end of the 2025 electoral cycle, these discussions had not materialized into concrete legislative initiatives, leaving this structural vulnerability unaddressed.

From a FIMI perspective, these gaps create real space for unattributed funding and expenditures, as well as for delegitimizing narratives that frame the electoral

⁵⁹ OSCE/ODIHR. (2025). *Republic of Albania: Parliamentary Elections, 11 May 2025 – Final Report*. Warsaw. <https://odhr.osce.org/sites/default/files/f/documents/0/c/600028.pdf>

⁶⁰ National Democratic Institute (NDI). (2024). *The Vulnerability of Albanian Politics to Foreign Interference*. <https://ndi.org/sites/default/files/2025-04/The-Vulnerability-of-Albanian-Politics-to-Foreign-Interference-%281%29.pdf>

⁶¹ Gjoncaj, M. & Shehu, J. (2025, December 3). Advancing political finance transparency in Albania: Stakeholders unite for stronger electoral integrity. International IDEA. <https://www.idea.int/news/advancing-political-finance-transparency-albania-stakeholders-unite-stronger-electoral>

process as compromised and financed by dubious actors. This makes political financing not only a regulatory issue but also a key entry point for informational interference and contestation of the legitimacy of electoral competition.

This vulnerability is directly linked to **Enabler 2. Inadequate political finance regulations**. In conditions of weak oversight and low prevention, gaps in the regulatory framework intersect with weaknesses in the effectiveness of regulatory authorities and enforcement gaps (closely related to Enablers 14–15), as well as with the economic incentives of the “attention economy” and the digital political communication industry.

Illustrative case: Lack of financial transparency (2023 local elections and 2025 parliamentary elections)

In the local elections of 14 May, 2023, BIRN Albania’s analysis of the financial reports of electoral subjects identified a clear pattern: reporting is delayed, partial, and in some cases practically worthless for oversight. According to data from the Central Election Commission (CEC), by the end of June 2024, 28 electoral subjects had submitted reports; eight of them declared zero income and zero expenditure and were therefore excluded from further analysis.⁶² This “zero reporting” is not merely a technical anomaly, but signals a culture of non-compliance, in which an electoral subject can retain its legal status—without penalties—while failing to reflect the real cost of the campaign.

Subsequent BIRN reports on the financial transparency of mayoral candidates in the 2023 local elections⁶³ reinforced the same pattern of “formal compliance without substance”. Out of 144 candidates, only 127 had submitted a financial report, and of these, only 90 declared any campaign income or expenditure. Approximately 29% of reporting candidates reflected no electoral financial activity at all. In practice, this makes it impossible to obtain a complete picture of campaign financing and normalizes the idea that non-reporting (or fictitious reporting) does not constitute a real obstacle to political competition.

Similarly, despite the fact that 23,646 candidates were registered for municipal councils, the majority failed to submit declarations or declared zero expenditure. This resulted in an average of ALL 17 (less than EUR 0.20) spent per candidate—an indicator strongly suggestive of under-declaration or non-declaration of expenses. This gap weakens the function of reporting as a transparency mechanism and

⁶² Voko, K., Likmeta, B. & Erebara, G. (2024). *Analysis of the Financial Reports of Electoral Subjects on the 2023 Electoral Campaign*. BIRN Albania. Tirana. <https://birn.eu.com/wp-content/uploads/2025/01/Analysis-of-the-Financial-Reports-of-Electoral-Subjects-on-the-2023-Electoral-Campaign-.pdf>

⁶³ Voko, K., & Likmeta, B. (2024). *Analysis of the Financial Reports of Candidates for Local Government Units on the 2023 Election Campaign*. BIRN Albania. Tirana. <https://birn.eu.com/wp-content/uploads/2025/02/ANALYSIS-OF-THE-FINANCIAL-REPORTS-OF-CANDIDATES-FOR-LOCAL-GOVERNMENT-UNITS-ON-THE-2023-ELECTION-CAMPAIGN.pdf>

shifts the public debate towards suspicion: if real expenditures are not reflected, then the real sources of financing remain in “grey areas”.

This pattern continued to be reflected in the 2025 parliamentary elections, where out of 38 electoral subjects only 32 submitted financial reports, while out of 2,046 parliamentary candidates fewer than 1,500 submitted a financial report by the legal deadline of 4 November 2025. The fact that massive non-reporting is not accompanied by consequences affecting the right of subjects or candidates to compete in future electoral cycles consolidates this vulnerability as structural: actors rationally “calculate” that non-compliance with obligations is tolerable.

Lack of alignment with international standards

The Albanian legal and regulatory framework for electoral campaigns has historically been built on a logic that gives a privileged status to legacy media and major political actors. At the same time, the Electoral Code contains no specific provisions on online campaigning and does not impose clear obligations on digital platforms with regard to the transparent identification of sponsors, sources of funding, or audience-targeting practices.⁶⁴

This regulatory gap takes on particular significance in the context of the European integration process, as Albania has not yet aligned its electoral legislation with key EU instruments aimed at increasing transparency and accountability in the digital environment. While in the European Union these risks are addressed through the Digital Services Act (DSA)⁶⁵ and the Regulation on the Transparency and Targeting of Political Advertising (TTPA),⁶⁶ the Albanian framework does not regulate the responsibilities of digital platforms in general, nor the mitigation of systemic digital risks in the electoral context in particular. These EU legal instruments have been designed, inter alia, to limit the spaces in which information interference and covert influence operate through non-attributed advertising and opaque micro-targeting.⁶⁷

In practice, the lack of alignment with the EU acquis in this field is not merely a formal integration issue, but an operational vulnerability. The absence of

Digital regulatory
gaps expose
elections to
cross-border
interference.

⁶⁴ BIRN Albania. (2025). *Working Paper: Preventing Foreign Interference in Democratic and Electoral Processes in Albania*.

⁶⁵ Council of the European Union. (2022). *Regulation (EU) 2022/2065 on a Single Market For Digital Services and amending Directive 2000/31/EC (Digital Services Act)*. <https://eur-lex.europa.eu/eli/reg/2022/2065/oj/eng>

⁶⁶ Council of the European Union. (2024). *Regulation (EU) 2024/900 on the transparency and targeting of political advertising*. <https://eur-lex.europa.eu/EN/legal-content/summary/transparency-and-targeting-of-political-advertising.html>

⁶⁷ Bojadzievska, I., Cabacenco, P., Ivasyk, S. & Reçi, M. (2025). *Navigating the European Union's Digital Regulatory Framework: Part 2. Perspectives on Electoral Processes in EU Candidate Countries*. International IDEA. Stockholm. <https://www.idea.int/sites/default/files/2025-10/navigating-eu-digital-regulatory-framework-part2.pdf>

transparency and traceability obligations creates a favourable channel for unidentifiable influence, for coordinated campaigns conducted by networks operating beyond national jurisdiction, and for the use of third parties as intermediaries by real funders to convey political messaging. These gaps also interact with the economic incentives of the online advertising market, where platforms and various intermediaries benefit from the monetization of attention without bearing proportionate responsibility for transparency and the integrity of democratic processes.

The complexity increases further in the context of campaigning towards the diaspora, where the targeting of voters outside the national territory through online advertising and intermediary pages makes it even more difficult to identify real sponsors and sources of funding, as evidenced by documented cases of covert or third-party-funded campaigns aimed at diaspora voters.^{68 69}

An aspect directly linked to this vulnerability is the lack of regulation of lobbying activities in Albania and abroad. Albania does not have a dedicated law on lobbying, although in 2025 the first draft of such a law was published for public consultation.⁷⁰ The absence of a regulatory framework in this area implies the lack of a legal definition of a lobbyist, the absence of public registers, and a lack of transparency regarding relationships between public officials, political parties, and domestic or foreign lobbying actors. As demonstrated by judicial investigations and media reporting, lobbying contracts and related expenditures have been a source of dispute and suspicion of undue influence, particularly when used to internationalize political narratives following electoral processes (see the illustrative case below).

In parallel, Albania has adopted strategic instruments and “soft law” documents that clearly acknowledge this regulatory gap. The National Strategy against Foreign Interference and Disinformation 2025–2030⁷¹ and the Roadmap for the Functioning of Democratic Institutions⁷² articulate the need to regulate

⁶⁸ Likmeta, B. (2025, January 24). Qiellgërvishtës dhe reklama: Fushata e fshehtë në Facebook për votën e Diasporës [Skyscraper and advertising: Secret Facebook campaign targeting diaspora vote]. *Reporter.al*. <https://www.reporter.al/2025/01/24/qiellgervishtes-dhe-reklama-fushata-e-fshehte-ne-facebook-per-voten-e-diaspores/>

⁶⁹ Likmeta, B. (2025, April 12). “Takim ekskluziv”: Edi Rama bën fushatë të financuar nga “palë të treta” me diasporën [“Exclusive meeting”: Edi Rama conducts campaign funded by “third parties” with diaspora]. *Reporter.al*. <https://www.reporter.al/2025/04/12/takim-ekskluziv-edi-rama-ben-fushate-te-financuar-nga-pale-te-treta-me-diasporen/>

⁷⁰ Government of Albania. (2025). *Projektligj “Për lobimin” – Konsultim publik* [Draft Law “On Lobbying” – Public Consultation]. <https://konsultimipublik.gov.al/Konsultime/Detaje/890>

⁷¹ Parliament of Albania. (2025). *Ligj nr. 47, datë 3.7.2025, Për miratimin e Strategjisë Kombëtare kundër Ndërhyrjeve të Huaja* [Law no. 47, 3 July 2025, On the Approval of the National Strategy against Foreign Interference]. <https://kuvendwebfiles.blob.core.windows.net/webfiles/202507170801443359Ligj%20nr.%2047%2C%20dt%203.7.2025.pdf>

⁷² Council of Ministers of Albania. (2024). *Vendim nr. 611, datë 02.10.2024, Për miratimin e Udhërrëfyesit për Funksionimin e Institucioneve Demokratike* [Decision no. 611, 2 October 2024, On the Approval of the Guide for the Functioning of Democratic Institutions]. <https://www.drejtesia.gov.al/wp-content/uploads/2024/10/VKM-nr.-611-date-2.10.2024-Per-miratimin-e-Udherrefyesit-per-Funksionimin-e-Institucioneve-Demokratike.pdf>

digital campaigning, ensure transparency of online political advertising, oversee third parties, and strengthen sanctions. Despite the existence of consolidated international standards and strategic-level commitments to align with them, these have not yet been translated into clear legal obligations, enforceable mechanisms, or the allocation of the necessary institutional capacities.

These issues are directly linked to **Enabler 15. Gaps in media and Internet regulations** and **Enabler 16. Unclear applicability of international norms**. From the perspective of information interference, this combination creates a favourable environment for influence operations that exploit regulatory ambiguity and the lack of cross-border accountability.

Illustrative case: Lobbying abroad and its impact on electoral processes

Lobbying contracts and related expenditures by political parties or politicians in Albania are characterized by a lack of transparency and, in some cases, have been the subject of criminal investigations. One such famous example is the case of the former President of Albania, Ilir Meta, who is currently in pre-trial detention, awaiting trial on charges related to corruption and money laundering. He is accused of failing to declare hundreds of thousands of US dollars in lobbying expenditures in the United States, allegedly used to influence US policy towards Albania and towards the party he leads, the Freedom Party.⁷³

Relations with US lobbyists also generated controversy on the eve of the 11 May 2025 parliamentary elections, when it became public that the opposition Democratic Party, led by former Prime Minister Sali Berisha, had signed a lobbying contract worth 6 million USD in the United States with Continental Strategy LLC, headed by Carlo Trujillo, a former adviser to US President Donald Trump. The substantial sum, which according to reporting was to be paid in instalments of 250,000 USD by a foundation represented by an Albanian-American emigrant, prompted the launch of an investigation by SPAK.⁷⁴

Following its defeat in the 2025 parliamentary elections, the Democratic Party continued its external influence strategy by using the high-value lobbying firm in Washington to challenge the legitimacy of the electoral process. Through its contract with Continental Strategy, the Democratic Party sought to internationalize claims of electoral manipulation, calling for an international investigation and the establishment of a technical government. This effort aimed

⁷³ Hoxhaj, E. (2024, October 21). Akuzat e SPAK: Tre dosjet e korrupsionit që çuan në pranga Ilir Metën [SPAK accusations: Three corruption cases leading to the arrest of Ilir Meta]. *Reporter.al*. <https://www.reporter.al/2024/10/21/akuzat-e-spak-tre-dosjet-e-korrupsionit-qe-cuan-ne-pranga-ilir-meten/>

⁷⁴ Hoxhaj, E. (2025, April 27). SPAK heton kontratën e lobimit të PD-së në SHBA [SPAK investigates PD's lobbying contract in the USA]. *Reporter.al*. <https://www.reporter.al/2025/04/27/spak-heton-kontraten-e-lobimit-te-pd-se-ne-shba/>

to counter the Albanian government's dominant narrative on the democratic legitimacy of the elections and to consolidate an alternative frame portraying Albania as an autocratic system characterized by corruption, state capture, and organized crime.⁷⁵

These cases highlight several key FIMI-related vulnerabilities affecting the electoral process in Albania. These include the use of professional lobbying to project contested political narratives abroad, the blurring of the line between legitimate advocacy and attempts to delegitimize electoral results in the international arena, and the lack of transparency regarding the origin of financial resources used by opposition political actors to influence external perceptions.

Elections are not the only democratic process in Albania that has been the target of foreign lobbying campaigns contracted by Albanian politicians. Justice and anti-corruption institutions, in particular SPAK, have also been targets of disinformation and propaganda campaigns linked to lobbying contracts and relationships with foreign PR firms, signed by politicians under criminal investigation.

Beyond the cases outlined above, former Deputy Prime Minister Arben Ahmetaj, as well as the Mayor of Tirana, Erion Veliaj, have also entered into contracts with lobbying and PR companies abroad. Content produced within this framework has subsequently been translated and amplified by pro-government media in Albania, a practice that disinformation experts describe as "information laundering".⁷⁶

Domain 3

Media and electoral information between formal pluralism and fragmented regulation

The media and the information environment play a central role in shaping how citizens are informed about the electoral process, political actors, and electoral alternatives. During the 2025 parliamentary elections, the media space in Albania was characterized by concentrated ownership, editorial alignment, economic pressures, and a strong interlinkage between traditional and online

⁷⁵ Karaj, V. (2025, May 29). Lobimi i PD-së kundër legjitimitetit të zgjedhjeve në SHBA mbart pikëpyetje [PD's lobbying against election legitimacy in the USA raises questions]. *Reporter.al*. <https://www.reporter.al/2025/05/29/lobimi-i-pd-kunder-legjitimitetit-te-zgjedhjeve-ne-shba-mbart-pikepyetje/>

⁷⁶ Karaj, V. (2025, December 16). Fushata ndërkombëtare e PR-it për Veliaj dhe lavatrica mediatike shqiptare [International PR campaign for Veliaj and the Albanian media washing machine]. *Reporter.al*. <https://www.reporter.al/2025/12/16/fushata-nderkombetare-e-pr-it-per-veliaj-dhe-lavatrica-mediatike-shqiptare/>

media, often without equivalent standards of transparency and accountability.

Structural weaknesses in media pluralism and independence directly affect the quality of public debate and create conditions in which one-sided, manipulated, or politically driven content can be amplified. In this environment, the media does not merely inform but, in some cases, it becomes a vector for the dissemination of polarizing narratives and disinformation, including content originating from external sources.

This domain analyses five key vulnerabilities:

- the lack of media pluralism and independence as a basis for vulnerability to FIMI;
- the limited legal framework and ineffective regulation of audiovisual coverage of electoral campaigns;
- the role of audiovisual political advertising in distorting electoral competition;
- the unregulated online media space and exposure to disinformation; and
- the presence and influence of foreign media in the Albanian information space.

Taken together, these vulnerabilities describe a fragmented and uneven information environment in which the boundaries between information, political persuasion, and manipulation become blurred, increasing the risk that FIMI spreads through existing media channels and influences public perceptions of the electoral process.

Lack of media pluralism and independence

For years, the media environment in Albania has exhibited deep structural weaknesses, including high concentration of media ownership, the intertwining of political and economic interests of owners, lack of transparency in financing—particularly in online media—and precarious working conditions for journalists. These factors create an environment in which the media often does not function as a critical intermediary between politics and the audience, but rather as a channel for reproducing the narratives of dominant political and institutional actors.^{77 78}

Concentrated and politically aligned media weaken verification and amplify manipulation.

⁷⁷ European Commission. (2025). *Albania 2025 Report*. Brussels. https://enlargement.ec.europa.eu/document/download/fe9138b7-90fe-4277-a12c-3a03f6d1957f_en

⁷⁸ European Commission. (2025). *Rule of Law Report 2025 – Chapter on Albania*. Strasbourg. https://commission.europa.eu/document/download/3732ae59-5ab4-48a6-a3e6-0ef9aa593863_en

According to the European Commission, concentration of media ownership and the lack of financial transparency continue to negatively affect media independence in Albania, while political and economic interference remains a persistent concern. Similar findings are reflected in the Media Pluralism Monitor, which classifies the Albanian media market as “high risk” for pluralism, due to horizontal concentration in both audiovisual and print media, the absence of effective regulatory measures, and the influence of owners over editorial lines.⁷⁹

Media ownership monitoring shows that a very limited number of families control the overwhelming majority of television audiences and a significant share of the print media market, centralizing the power to shape public discourse.⁸⁰

These structural weaknesses translate directly into uneven editorial practices, particularly during electoral periods. Studies show a high level of use of ready-made materials (content) produced by state institutions, political parties, and the communication offices of political leaders, which are broadcast or published by media outlets as informational content without independent verification, without context, and in most cases without clear identification as propaganda material.⁸¹ This practice reduces the journalist’s role in processing information critically and transforms the function of the media into a distributor of political messages, blurring the line between information, opinion, and propaganda.

Another key factor affecting the quality of reporting is journalists’ job insecurity. Poor working conditions, the lack of stable contracts, and economic pressure increase self-censorship and reduce journalists’ capacity to resist political and economic interference.⁸² During 2025, this situation was exacerbated by a series of documented incidents of intimidation, threats, and verbal or physical attacks against journalists during the electoral campaign, hindering independent coverage of electoral activities.⁸³ Cases reported by the SafeJournalists Network show that pressure on journalists is not only structural, but also direct and linked to politically sensitive moments.

Weaknesses in professional and ethical journalism standards constitute another key element of this vulnerability. The lack of resources, training, and clear editorial policies for information verification—particularly on complex issues such as international politics, security, and Euro-Atlantic integration—

⁷⁹ Likmeta, B. & Voko, K. (2025). *Monitoring Media Pluralism in the European Union: Results of the MPM2025. Country Report: Albania*. European University Institute, Centre for Media Pluralism and Media Freedom (CMPF). Florence. <https://cadmus.eui.eu/entities/publication/f5be0d78-00ae-4b29-aadb-b487390cfb2>

⁸⁰ Global Media Registry & BIRN Albania. (2023). *Media Ownership Monitor in Albania*. Tirana. <https://albania.mom-gmr.org/en/>

⁸¹ Voko, K., Lelo, E. & Shehu, J. (2025). *Audiovisual Media Monitoring: Albania's Parliamentary Elections 2025*. BIRN Albania. Tirana. <https://birn.eu.com/wp-content/uploads/2025/12/Audiovisual-Media-Monitoring-ENG.pdf>

⁸² Science & Innovation for Development (SCiDEV) & BIRN Albania. (2024). *Annual Report 2024: Tracking Albania's Progress on Media Freedom and Journalistic Safety in Line with European Union Standards*. Tirana. https://birn.eu.com/wp-content/uploads/2025/02/Annual-Report-2024_ENG-1.pdf

⁸³ SafeJournalists Network. (2025). *Incidents Against Journalists in Albania: Monthly Reporting and Incident Database, May 2025*. <https://safejournalists.net/>

creates conditions for superficial reporting, reproduction of external sources, and amplification of manipulative narratives.⁸⁴ A telling example during the 2025 elections was the publication and amplification of analyses attributed to a fictitious “political commentator”, which later proved to be a fabricated identity designed to generate artificial legitimacy for specific political narratives—a practice that reflects serious shortcomings in editorial control and professional ethics.⁸⁵

As a result of these overlapping factors, public trust in the media has steadily declined. Surveys show that a large share of Albanian citizens express distrust towards legacy media, while an increasing proportion of information is consumed through social media platforms, which simultaneously constitute one of the main sources of exposure to disinformation.⁸⁶ This trust deficit makes the public more susceptible to narratives that delegitimize traditional media and shift attention towards alternative sources, which are often opaque or manipulated.

This vulnerability represents a combination of **Enabler 7. Lack of media pluralism and independence**, **Enabler 9. Poor journalism and low journalistic standards**, and **Enabler 10. Decline in trust in mainstream news sources**. Together, these factors create a fragile information environment in which the media fails to effectively filter, verify, and contextualize political information. In such an environment, manipulative narratives—whether domestic or foreign—are more likely to circulate unchallenged, making this vulnerability a structural foundation upon which different forms of FIMI are built and amplified during electoral processes.

Limited legal framework on media and campaign coverage

Despite certain provisions in the Electoral Code aimed at guaranteeing equality in media coverage during the campaign, the legal and regulatory framework for audiovisual media remains partial and outdated in relation to the current reality of political communication. The OSCE/ODIHR notes that the existing regulation focuses primarily on news bulletins, leaving largely unaddressed the parts of the media space where political debate in fact takes place, including political talk shows, dedicated interviews, and live broadcasts of campaign activities.⁸⁷

Weak audiovisual regulation allows unequal exposure in election coverage.

⁸⁴ Kaziaj, E., & Keta, V. (2024). *The Distribution of Disinformation Narratives by Hostile Actors against NATO and the EU in the Albanian Media*. BIRN Albania. Tirana <https://birn.eu.com/wp-content/uploads/2024/10/The-distribution-of-disinformation-narratives-by-hostile-actors-against-NATO-and-the-EU-in-the-Albanian-media.pdf>

⁸⁵ Karaj, V. (2025, May 26). Një cirk tragjik në median shqiptare: Një “analiste e fabrikuar” bëhet virale [A tragic circus in Albanian media: A “fabricated analyst” goes viral]. *Reporter.al*. <https://www.reporter.al/2025/05/26/nje-cirk-tragjik-ne-median-shqiptare-nje-analiste-e-fabrikuar-behet-virale/>

⁸⁶ Regional Cooperation Council. (2024). *Balkan Barometer 2024: Public Opinion Survey*. Sarajevo. <https://www.rcc.int/seeds/results/2/balkan-barometer>

⁸⁷ OSCE/ODIHR. (2025). *Republic of Albania: Parliamentary Elections, 11 May 2025 – Final Report*. Warsaw. <https://odihr.osce.org/sites/default/files/f/documents/0/c/600028.pdf>

Audiovisual media monitoring by BIRN Albania during the 2025 parliamentary elections confirms that these formats not only occupy a significant share of television programming, but often function as the main channels of political exposure.⁸⁸ However, they are not subject to any clear legal requirements regarding fairness of treatment or transparency as sponsored or paid content, creating a substantial gap between formal regulation and actual practice. In the absence of specific rules, monitoring shows that different television channels broadcast dedicated interviews, “special” programmes, or extended live coverage for certain political actors, without any obligation to provide comparable treatment to other electoral subjects.⁸⁹

Another identified problem relates to the lack of clear provisions prohibiting or requiring the identification of hybrid forms of content that lie at the boundary between editorial information and political promotion. The OSCE/ODIHR reports and monitoring by domestic organizations observe that structured interviews, lengthy reports, or personalized formats were frequently used to convey campaign messages without being clearly labelled as sponsored or paid content.^{90 91} This ambiguity undermines the transparency for the public and makes effective oversight by responsible authorities more difficult.

Even in cases where minor violations of the existing framework were identified, sanctioning mechanisms proved weak. The Electoral Code does not provide for specific sanctions for most of these practices, while fines applicable to other violations are symbolic and very low, failing to create any deterrent effect for broadcasters.⁹² As a result, potential sanctions for violations are not perceived as a real risk by media outlets, but rather as negligible operational costs during the campaign.

This combination of incomplete legal regulation and a lack of effective accountability created conditions for marked inequality in media coverage of the electoral process. BIRN monitoring documents significant disparities in airtime and visibility among political subjects, particularly in formats that are not included in the formal calculation of news coverage.⁹³ This inequality was not merely the result of individual editorial choices, but a direct consequence of

⁸⁸ Voko, K., Lelo, E., & Shehu, J. (2025). *Audiovisual Media Monitoring: Albania's Parliamentary Elections 2025*. BIRN Albania. Tirana. <https://birn.eu.com/wp-content/uploads/2025/12/Audiovisual-Media-Monitoring-ENG.pdf>

⁸⁹ Likmeta, B. (2025, April 29). Mediat televizive kthehen në “zgjatim” të propagandës partiake gjatë fushatës [Television media became an “extension” of partisan propaganda during the campaign]. *Reporter.al*. <https://www.reporter.al/2025/04/29/mediat-televizive-kthehen-ne-zgjatim-te-propagandes-partiake-gjate-fushates/>

⁹⁰ OSCE/ODIHR. (2025). *Republic of Albania: Parliamentary Elections, 11 May 2025 – Final Report*. Warsaw. <https://odhr.osce.org/sites/default/files/f/documents/0/c/600028.pdf>

⁹¹ Gjoka, B. (2025, May 14). Partitë dhe kandidatët nuk respektuan lirinë dhe transparencën mediatike [Parties and candidates did not respect media freedom and transparency]. *Reporter.al*. <https://www.reporter.al/2025/05/14/partite-dhe-kandidatet-nuk-respektuan-lirine-dhe-transparencen-mediatike/>

⁹² OSCE/ODIHR. (2025). *Republic of Albania: Parliamentary Elections, 11 May 2025 – Final Report*. Warsaw. <https://odhr.osce.org/sites/default/files/f/documents/0/c/600028.pdf>

⁹³ Voko, K., Lelo, E. & Shehu, J. (2025). *Audiovisual Media Monitoring : Albania's Parliamentary Elections 2025*. BIRN Albania. Tirana <https://birn.eu.com/wp-content/uploads/2025/12/Audiovisual-Media-Monitoring-ENG.pdf>

a regulatory framework that does not reflect the actual structure of the media ecosystem.^{94 95}

From the perspective of electoral integrity and FIMI, this vulnerability is of particular importance. A legal framework that regulates only a limited portion of audiovisual content and fails to address the most influential formats of political communication creates space for selective manipulation of visibility, reinforcement of dominant narratives, and indirect delegitimization of less-exposed actors.^{96 97}

This vulnerability is primarily linked to **Enabler 14. Ineffective regulatory authorities** and **Enabler 15. Gaps in media and Internet regulations**, while also interacting with **Enabler 7. Lack of media pluralism and independence**, thereby creating structural conditions that increase the vulnerability of the electoral process to information manipulation.

In this context, the subsequent analysis of audiovisual coverage during the 2025 parliamentary election campaign serves as an illustrative case of how structural weaknesses in pluralism, regulation, and editorial practices translated into concrete electoral inequalities, creating favourable conditions for the distortion of political competition and the amplification of dominant narratives.

Illustrative case: Inequality in audiovisual media coverage during the electoral campaign

Monitoring of audiovisual media during the 2025 parliamentary election campaign documents a consistent and deepening pattern of inequality in electoral coverage, going beyond ordinary editorial imbalance and reflecting a structural vulnerability of the Albanian media ecosystem. Findings from the monitoring of the Audiovisual Media Authority (AMA), analysed by BIRN,⁹⁸ show that despite legal obligations to guarantee pluralism and equal access, electoral competition in the audiovisual sector was dominated almost entirely by the two main political subjects: the Socialist Party and the Alliance for a Greater Albania.

⁹⁴ Likmeta, B. (2025, April 29). Mediat televizive kthehen në “zgjatim” të propagandës partiake gjatë fushatës [Television media became an “extension” of partisan propaganda during the campaign]. *Reporter.al*. <https://www.reporter.al/2025/04/29/mediat-televizive-kthehen-ne-zgjatim-te-propagandes-partiake-gjate-fushates/>

⁹⁵ Likmeta, B. (2025, May 15). Kontrolli mbi mediat shtroi rrugën për mandatin e katërt të Partisë Socialiste [Control over media paved the way for the Socialist Party's fourth term]. *Reporter.al*. <https://www.reporter.al/2025/05/15/kontrolli-mbi-mediat-shtroi-rrugen-per-mandatin-e-katert-te-partise-socialiste/>

⁹⁶ OSCE/ODIHR. (2025). *Republic of Albania: Parliamentary Elections, 11 May 2025 – Final Report*. Warsaw. <https://odhr.osce.org/sites/default/files/f/documents/0/c/600028.pdf>

⁹⁷ European Commission. (2025). *Albania 2025 Report*. Brussels. https://enlargement.ec.europa.eu/document/download/fe9138b7-90fe-4277-a12c-3a03f6d1957f_en

⁹⁸ Voko, K., Lelo, E. & Shehu, J. (2025). *Audiovisual Media Monitoring: Albania's Parliamentary Elections 2025*. BIRN Albania. Tirana <https://birn.eu.com/wp-content/uploads/2025/12/Audiovisual-Media-Monitoring-ENG.pdf>

These two subjects accounted for more than 75% of airtime in the main formats of electoral coverage—including news bulletins, live broadcasts, and political programmes—leaving minimal space for other subjects. Inequality was particularly pronounced in news bulletins, where the two dominant subjects benefited from 93.9% of total airtime, while all other subjects combined were limited to just 6.1%. This level of exposure is far below the minimum threshold envisaged by the Electoral Code for ensuring pluralism, which aims for other subjects to receive at least half of the time allocated to the main parties.

Even in public media, where legal obligations for balance are clearer, the distribution of airtime failed to meet the required standards. RTSH 1 and RTSH 24 displayed a relatively more balanced allocation compared to private broadcasters, yet even there, smaller electoral subjects received just over 17% of airtime in news bulletins—still insufficient to guarantee genuine equality of access to the public. In live broadcasts and political programmes, the gap widened further, reproducing the same pattern of concentrated visibility.

A core element of this illustrative case concerns the personalization of electoral coverage. The analysis shows that media narratives were constructed primarily around two leading political figures, Edi Rama and Sali Berisha, who together received more than two thirds of live coverage dedicated to individual actors. This narrow focus on the leaders of the largest parties reinforced a leader-centric campaign logic rather than a programme-based one, shifting attention away from political platforms, other candidates, and alternative political choices. In political programmes, this tendency was further reinforced by “one-to-one” formats and curated profiles, which increased individual exposure while avoiding competitive debates and critical confrontation of ideas.

The monitoring also highlights serious limitations in the oversight of local and regional media. Although the AMA formally included 57 audiovisual broadcasters in its monitoring scheme, monitoring of local media was carried out only partially and on a rotational basis, due to resource constraints. This makes a comprehensive assessment of the role of local media in guaranteeing pluralism impossible, creating a “blind spot” where potential violations or structural inequalities remain undocumented.

These data illustrate how extreme inequality in audiovisual coverage, combined with personalization of discourse and regulatory weaknesses, creates a favourable environment for the delegitimization of political competition. When the majority of political actors remain practically invisible in the media with the greatest public impact, the electoral space is artificially narrowed and perceptions of democratic choice are distorted. From a FIMI perspective, this configuration turns audiovisual media into a structural amplification point, where dominant narratives acquire institutional legitimacy and are then circulated and reinforced in the digital space.

Political advertising in audiovisual media and the distortion of electoral competition

Unequal and opaque television advertising distorts competition.

The Albanian legal framework regulating political advertising in audiovisual media is, in principle, intended to guarantee equal conditions of competition among electoral subjects. The Electoral Code sets maximum limits on the advertising airtime that a subject may broadcast on each audiovisual operator, defines permitted time slots for broadcasting, and establishes the obligation that the price per minute of advertising be the same for all electoral subjects. These provisions aim to limit financial advantage and prevent domination of the media space by actors with greater financial resources, thereby increasing transparency and formal equality in the electoral competition.⁹⁹

However, in the 2025 parliamentary elections, as well as in previous electoral cycles, the practical implementation of this framework has remained limited. The OSCE/ODIHR notes that, despite the existence of detailed rules, oversight and enforcement have not always been effective, creating space for circumvention and selective use of political advertising.¹⁰⁰ One structural weakness relates to the failure of electoral subjects to fulfil their legal obligation to submit advertising tariffs in advance to the Central Election Commission (CEC), which constrains the institution's ability to exercise real-time oversight during the electoral campaign and shifts supervision to a post-electoral phase.

These challenges were further compounded by recent amendments to the Electoral Code, adopted shortly before the 2025 elections, which extended the right to purchase television airtime not only to electoral subjects but also to individual candidates on open lists.¹⁰¹ While this measure was presented as an effort to increase intra-list competition, in practice it made the monitoring of political advertising more complex and complicated the interpretation of data provided through AMA monitoring. The fragmentation of advertising purchases between parties and individual candidates increased the risk of opacity regarding the real source of funds and compliance with legal limits on airtime and costs.

A significant precedent illustrating these weaknesses was set during the 2021 parliamentary elections. In that electoral cycle, BIRN documented that political parties broadcast television advertisements with an estimated value of approximately EUR 5.1 million, while official reports submitted to the CEC declared only around EUR 685,000 in advertising expenditures.¹⁰² This marked

⁹⁹ OSCE/ODIHR. (2025). *Republic of Albania: Parliamentary Elections, 11 May 2025 – Final Report*. Warsaw. <https://odihr.osce.org/sites/default/files/f/documents/0/c/600028.pdf>

¹⁰⁰ OSCE/ODIHR. (2025). *Preliminary Findings and Conclusions – Parliamentary Elections in Albania, 11 May 2025*. Warsaw. https://odihr.osce.org/sites/default/files/f/documents/4/f/590598_4.pdf

¹⁰¹ Barjamemaj, A. (2025, February 11). PS–PD miratojnë së bashku rritjen e financimeve dhe kohës televizive në fushatë [PS–PD jointly approve increase in campaign funding and TV time]. *Reporter.al*. <https://www.reporter.al/2025/02/11/ps-pd-miratojne-se-bashku-rritjen-e-financimeve-dhe-kohes-televizive-ne-fushate/>

¹⁰² Likmeta, B. (2021, June 11). Albanian Parties' Election TV Ads Blitz Goes Unsanctioned. *Balkan Insight*. <https://balkaninsight.com/2021/06/11/albanian-parties-election-tv-ads-blitz-goes-unsanctioned/>

discrepancy suggested the use of undeclared in-kind donations and non-transparent campaign financing channels. As a result, for the first time in Albania, sanctions were applied for violations related to undeclared media exposure: in December 2022, the CEC imposed fines on political parties and sanctioned several audiovisual media outlets for exceeding the legal limit of 90 minutes of political advertising.

During the 2025 elections as well, BIRN's audiovisual monitoring and AMA data indicate that structural problems in political advertising persisted, particularly with regard to transparency, clear identification of paid content, and compliance with legal limits.¹⁰³ These weaknesses, which are detailed in the illustrative case below, create favourable conditions for the distortion of electoral competition and for the reinforcement of delegitimizing narratives about the process, portraying it as influenced by hidden financial and media interests.

In this sense, unequal and preferential audiovisual political advertising constitutes a significant vulnerability to FIMI. Weaknesses in law enforcement and in ensuring transparency create space for covert financial influence, distortion of public perception, and manipulative narratives that undermine trust in the fairness of the electoral competition. This vulnerability is linked to **Enabler 2. Inadequate political finance regulations** and **Enabler 14. Ineffective regulatory authorities**, while also interacting with **Incentive 1. Engagement-driven media business models**, making audiovisual media a key risk point in the information manipulation ecosystem during electoral campaigns.

Illustrative case: Audiovisual political advertising during the 2025 parliamentary elections

During the 2025 parliamentary elections, political advertising in audiovisual media played a secondary role compared to other forms of electoral communication, such as coverage in news bulletins, as well as live broadcasts and political programmes. Monitoring of 15 private nationwide television channels—excluding public broadcasters, which are legally prohibited from airing paid advertising—shows that during the official campaign period (11 April–9 May 2025) a total of 1,713 minutes of political advertising were broadcast, or just over 28 hours of content. This relatively low volume confirms a well-established trend in Albania: paid advertisements are not the primary campaign instrument, while political subjects rely mainly on “earned” visibility through news media and less regulated editorial formats.¹⁰⁴

¹⁰³ Voko, K., Lelo, E., & Shehu, J. (2025). *Audiovisual Media Monitoring: Albania's Parliamentary Elections 2025*. BIRN Albania. Tirana <https://birn.eu.com/wp-content/uploads/2025/12/Audiovisual-Media-Monitoring-ENG.pdf>

¹⁰⁴ Voko, K., Lelo, E., & Shehu, J. (2025). *Audiovisual Media Monitoring: Albania's Parliamentary Elections 2025*. BIRN Albania. Tirana <https://birn.eu.com/wp-content/uploads/2025/12/Audiovisual-Media-Monitoring-ENG.pdf>

However, even this limited volume of advertising was characterized by extreme inequality in distribution. The two main political subjects—the Alliance for a Greater Albania and the Socialist Party—dominated almost the entire paid advertising space. The Alliance for a Greater Albania accounted for 910 minutes of advertising (53.1% of the total), while the Socialist Party accounted for 756 minutes (44.1%). All other electoral subjects combined appeared for only 1.6 minutes of advertising, a symbolic amount that underscores the real constraints faced by smaller and newer political actors in using this communication format. This distribution reflects not only deep disparities in financial resources, but also a regulatory environment that does not create genuine incentives for a more equitable use of audiovisual advertising.

Analysis of detailed, broadcaster-level data shows that political advertising was concentrated in a limited number of channels. In some cases, the dominance of a single subject on a given channel was particularly pronounced: for example, on one news-focused television channel, the Socialist Party aired over 130 minutes of advertising, while its main rival appeared for only a few minutes. This unbalanced distribution reinforces the perception that access to television advertising is selective and closely linked to entrenched relationships between political actors and specific media outlets.

Beyond inequality in access, the monitoring identified repeated violations of the legal framework governing political advertising. The AMA documented cases of advertisements broadcast outside the legally permitted time slots, exceedance of maximum airtime limits, and failure to clearly identify content as political advertising. Specifically, 14 national and local television channels broadcast political advertisements outside the legally allowed period, while 10 broadcasters aired a total of 64 advertisements without any indication identifying the sponsoring subject. In two documented cases, political advertisements were integrated into news bulletins, violating the fundamental principle of separation between editorial and paid content. In addition, some media outlets broadcast electoral polls without providing basic methodological information, undermining transparency and increasing the risk of manipulation of public perception.

Although the proportion of unidentified advertisements was relatively low compared to the total, their very existence is significant in a polarized electoral environment marked by low public trust. Unidentified advertisements make it more difficult to distinguish between information and propaganda, distort perceptions of real political support, and create space for suspicion regarding campaign financing sources. In the absence of rapid responses and effective sanctions during the electoral campaign, such violations produce effects that are primarily post-electoral, limiting the preventive function of regulation.

Overall, these data show that audiovisual political advertising in the 2025 elections did not function as a mechanism to balance competition, but rather reflected and reinforced existing inequalities. The dominance of the two main political subjects, the minimal space available to smaller parties, violations of transparency rules, and the lack of timely regulatory intervention

make audiovisual advertising significantly vulnerable to FIMI. In this context, weaknesses in enforcement and oversight do not necessarily generate direct manipulation of messages, but instead produce structural conditions in which perceptions of inequality, covert financial influence, and lack of accountability fuel delegitimizing narratives about the electoral process and undermine public trust in the fairness of the competition.

A lightly regulated online sphere enables low-accountability information amplification.

The unregulated online media space and exposure to disinformation

During the 2025 parliamentary elections, online media was an information space subject to minimal oversight. Transparency standards (regarding ownership, financing, sponsorship, and online political advertising) remain informal and, in practice, inconsistently enforceable. This creates an environment in which content of unclear origin circulates at low cost and with limited accountability risk, while the “traces” of financing or editorial provenance are often unverifiable. In this sense, regulatory gaps and the absence of institutionalized monitoring push the digital campaign towards a logic of “low visibility – low accountability”, in which actors can produce and disseminate information without transparency, particularly through hybrid portal–social media ecosystems.¹⁰⁵

These conditions directly affect the inequality of visibility and the quality of public debate. BIRN’s monitoring of online media during the 2025 elections shows that coverage was characterized by strong personalization, a high rate of statement reproduction, and a discursive structure that served leader competition more than programme-based information.¹⁰⁶ This editorial model during the electoral campaign highlighted a persistent “duopoly” of leaders and major political subjects—with clear dominance in the online news space—while new parties were left on the periphery of editorial attention.^{107 108} These practices turn electoral competition into a market of clicks and political replies, creating fertile ground for information fragmentation and for the circulation of polarizing narratives without even minimal verification filters.

¹⁰⁵ OSCE/ODIHR. (2025). *Republic of Albania: Parliamentary Elections, 11 May 2025 – Final Report*. Warsaw. <https://odihr.osce.org/sites/default/files/f/documents/0/c/600028.pdf>

¹⁰⁶ Voko, K., Babameto, S. & Keta, V. (2025). *Online Media Monitoring: Albania's Parliamentary Elections 2025*. BIRN Albania. Tirana. <https://birn.eu.com/wp-content/uploads/2025/12/Online-Media-Monitoring-ENG.pdf>

¹⁰⁷ Likmeta, B. (2025, April 28). “Sy m’sy”: Duopoli Rama–Berisha dominon median online gjatë fushatës zgjedhore [“Eye to eye”: Rama–Berisha duopoly dominates online media during the election campaign]. *Reporter.al*. <https://www.reporter.al/2025/04/28/sy-msy-duopoli-rama-berisha-dominon-median-online-gjate-fushates-zgjedhore/>

¹⁰⁸ Likmeta, B. (2025, May 19). Media online “injoroi” fushatën e partive të reja në zgjedhjet parlamentare [Online media “ignored” the campaign of new parties in the parliamentary elections]. *Reporter.al*. <https://www.reporter.al/2025/05/19/media-online-injoroi-fushaten-e-partive-te-reja-ne-zgjedhjet-parlamentare/>

A specific dimension of vulnerability relates to the transparency of online political advertising. In the financial reports of electoral subjects for the 2023 campaign (used here as a comparable precedent analysed by BIRN), declared expenditures for social media and digital communication components do not clarify the real weight of online campaigning, while the specific reporting category of “online/digital media” exhibits limited traceability.¹⁰⁹ In this context, in the absence of mandatory reporting standards, the online political advertising market remains practically un-auditable. In reality, digital campaigning is intense, yet it remains invisible to formal control mechanisms.

These gaps also increase the exposure of online media to imported disinformation and foreign-origin narratives, as the cross-border circulation of online content occurs with few indications regarding origin, motivation, or financing. BIRN’s report on the dissemination of disinformation narratives against NATO and the EU in Albanian media highlights that the information ecosystem, especially the online segment, is exposed to the mechanical reproduction of materials, weaknesses in editorial filters, and insufficient source verification, creating conducive channels for the spread of external narratives without transparency.¹¹⁰ The rapid circulation of recycled content and profiles with unclear credentials indicates that verification and correction mechanisms do not operate at the same pace as digital amplification. As a result, discourse legitimacy can be artificially generated through repetition and visibility, influencing public debate before corrective interventions become visible or effective.

This vulnerability is directly linked to **Enabler 11. Fragmented digital information environments** and **Enabler 12. Exploitability of digital and social media technologies**, as the lack of regulation and monitoring renders the online ecosystem easy to manipulate and difficult to audit.¹¹¹ At the same time, it interacts with **Incentive 1. Engagement-driven media business models** that privilege virality over accuracy, and with **Incentive 3. Weaponization of foreign media funding** and **Incentive 4. Availability of foreign-sourced news content**, since cross-border content can enter the online ecosystem and be recycled without transparency and without clear editorial accountability.

¹⁰⁹ Voko, K., Likmeta, B. & Erebara, G. (2024). *Analysis of the Financial Reports of Electoral Subjects on the 2023 Electoral Campaign*. BIRN Albania. Tirana <https://birn.eu.com/wp-content/uploads/2025/01/Analysis-of-the-Financial-Reports-of-Electoral-Subjects-on-the-2023-Electoral-Campaign-.pdf>

¹¹⁰ Kaziaj, E. & Keta, V. (2024). *The Distribution of Disinformation Narratives by Hostile Actors against NATO and the EU in the Albanian Media*. BIRN Albania. Tirana. <https://birn.eu.com/wp-content/uploads/2024/10/The-distribution-of-disinformation-narratives-by-hostile-actors-against-NATO-and-the-EU-in-the-Albanian-media.pdf>

¹¹¹ Voko, K., Babameto, S. & Keta, V. (2025). *Online Media Monitoring: Albania's Parliamentary Elections 2025*. BIRN Albania. Tirana. <https://birn.eu.com/wp-content/uploads/2025/12/Online-Media-Monitoring-ENG.pdf>

Illustrative case: Structural inequality and online political advertising during the 2025 elections

During the May 2025 parliamentary elections, online media in Albania emerged as one of the most challenging areas for the integrity of electoral information. Monitoring conducted by BIRN Albania found that, although online media constitute a primary source of information for a large segment of the public, they operated in an environment almost entirely outside the electoral regulatory framework, without systematic institutional monitoring and with unclear standards of transparency and accountability.¹¹² This situation created favourable conditions for pronounced inequalities in media coverage, the circulation of unattributed content, and increased exposure to disinformation.

Data from the 2025 campaign show that online coverage during the campaign period was almost entirely dominated by the two main political parties. Media discourse was personalized around the main political leaders and conflicts between them, while new parties, alternative candidates, and programmatic issues remained at the margins. In many cases, coverage of these actors was sporadic, reactive, or linked to controversy, significantly limiting their ability to communicate political programmes or to be perceived as legitimate alternatives by voters. This pattern reinforced the logic of a closed political competition, in which formal pluralism was not reflected in genuine informational pluralism.

A key issue identified through monitoring relates to the nature of published content. More than half of the analysed articles consisted of unprocessed political statements, replies, and counter-replies, often without fact-checking, context, or critical analysis. This approach reduced online media to a distribution channel for political messaging, weakening its informative and intermediary function. In the absence of strong editorial filters, emotional, polarizing, or speculative narratives circulated easily, shaping public perceptions of political actors and of the electoral process itself.

In addition to monitoring editorial output, BIRN Albania examined the placement of banner-style political advertising on online media outlets during the 30-day campaign period. A total of 90 banner advertisements promoting electoral contestants or candidates were recorded. As with editorial trends, advertising space was dominated by the two main electoral subjects. The Socialist Party of Albania accounted for 45.6% of all recorded advertisements (41 ads), followed by the coalition Alliance for a Greater Albania led by the Democratic Party, with 36.7% (33 ads). Nearly half of all banner advertisements (48%) promoted political parties or party messages, while the rest focused on individual candidates, reflecting a dual image strategy combining party-centred and personalized campaigning.

¹¹² Voko, K., Babameto, S., & Keta, V. (2025). *Online Media Monitoring: Albania's Parliamentary Elections 2025*. BIRN Albania. Tirana. <https://birn.eu.com/wp-content/uploads/2025/12/Online-Media-Monitoring-ENG.pdf>

Although digital political advertising is an increasingly important component of modern campaigns, transparency regarding its financing remains limited. This mismatch between visible campaigning activity and financial reporting makes it impossible to verify the equality of electoral competition and creates space for opaque or concealed funding—posing a direct risk to electoral integrity.

Overall, this illustrative case shows that online media during the 2025 parliamentary elections functioned as a high-risk space for the distortion of political competition and the spread of manipulative narratives. The combination of regulatory gaps, fragmented monitoring, structural inequalities in coverage, and weak financial transparency created an environment in which resource-rich and influential actors dominated the discourse, while new actors and alternative issues remained marginalized.

The presence and influence of foreign media in Albania's information space

A significant source of vulnerability of Albania's electoral processes to FIMI is linked to the integration and amplification of foreign-sourced narratives within the domestic information ecosystem, through online media, republication practices, and cross-border digital networks. In a media market characterized by limited transparency regarding ownership, financing, and editorial provenance, such external content is often recirculated as “domestic news”, generating false legitimacy and entering the informational and electoral cycle without sufficient traceability.

Electoral vulnerability does not stem from the mere existence of foreign media, but from the function their content assumes during electoral periods: as a primary source replicated by domestic outlets, as ready-made material for low-cost portals, and as a supplier of geopolitical narratives that, in a campaign context, can be rapidly activated as polarizing or delegitimizing content. For example, BIRN monitoring has documented that pro-Kremlin narratives penetrate primarily through Albanian-language portals and regional republications, shaping the electoral and information environment not through direct electoral appeals, but through framing perceptions of sovereignty, institutions, and the country's strategic orientation.¹¹³

A similar logic applies to content produced by media linked to anti-Western state interests. A BIRN and Science & Innovation for Development (SCiDEV)

Foreign-sourced
narratives
acquire domestic
legitimacy
through digital
republication.

¹¹³ Voko, K., & Likmeta, B. (2023). *Russian State-Sponsored Disinformation Narratives in Albania*. BIRN Albania. Tirana <https://birn.eu.com/wp-content/uploads/2023/07/Russian-state-sponsored-disinformation-narratives-in-Albania.pdf>

study on China's public diplomacy and the presence of Chinese state radio content in Albanian identified a steady flow of narratives and a well-organized digital presence that builds credibility as a source and shapes perceptions of the EU, NATO, and the international order.¹¹⁴ Although not directly linked to elections, such narratives condition the terrain of political competition and, during campaigns, become recyclable material for polarization, institutional relativization, or the delegitimization of political actors.

Likewise, BIRN analyses of Iranian-sourced content in Albanian show that anti-Western frames and delegitimizing discourse towards Albanian institutions increase electoral vulnerability by normalizing distrust and political cynicism. These dynamics can be exploited by domestic actors or intermediaries during election campaigns.¹¹⁵ Even when the most visible examples relate to events outside the electoral cycle, such as international summits or regional conflicts, they reveal the same mechanism. Reporting on Russian propaganda surrounding the European Political Community Summit in Tirana and disinformation in the context of the Israel–Iran conflict demonstrated how external narratives circulate rapidly in domestic media and become readily available for electoral manipulation.^{116 117}

This configuration is linked to **Enabler 11. Fragmented digital information environments**, **Enabler 12. Exploitability of digital and social media technologies**, and **Incentive 4. Availability of foreign-sourced news content**. While these narratives do not “determine” electoral outcome, their persistent presence and recycling create a stable risk infrastructure in which delegitimization, polarization, and narrative manipulation can be easily activated during election campaigns, when information flows intensify and institutional corrective capacity is more limited.

¹¹⁴ Bino, B., & Likmeta, B. (2023). *Media Analysis: China's Public Diplomacy*. BIRN Albania and Science & Innovation for Development (SCiDEV). Tirana. <https://birn.eu.com/wp-content/uploads/2023/07/Chinas-public-diplomacy-in-Albania-.pdf>

¹¹⁵ Bino, B. & Likmeta, B. (2023). *Media Analysis: Iran's Propaganda in Albanian Language*. BIRN Albania and Science & Innovation for Development (SCiDEV). Tirana. https://birn.eu.com/wp-content/uploads/2023/07/Media-Analysis_Irans-Propaganda-in-Albanian-Language.pdf

¹¹⁶ Karaj, V. (2025, June 10). Propaganda ruse targetoi samitin e Komunitetit Europian në Tiranë [Russian propaganda targeted the European Political Community summit in Tirana]. *Reporter.al*. <https://www.reporter.al/2025/06/10/propaganda-ruse-targetoi-samitin-e-komunitetit-europian-ne-tirane/>

¹¹⁷ Karaj, V. (2025, June 17). Konflikti midis Izraelit dhe Iranit përmyt median shqiptare me lajme të rreme [The Israel–Iran conflict floods Albanian media with fake news]. *Reporter.al*. <https://www.reporter.al/2025/06/17/konflikti-midis-izraelit-dhe-iranit-permyt-median-shqiptare-me-lajme-te-rreme/>

Domain 4

Digital space, platforms, and the risk of electoral information manipulation

The digital space and social media platforms have become a central component of political competition and electoral communication in Albania. During the 2025 parliamentary elections, social media not only complemented traditional media but, in many cases, became the primary channel for voter mobilization, campaign personalization, and message amplification. Despite this transformation, regulatory frameworks, oversight mechanisms, and institutional capacities have not evolved at the same pace as technological developments and digital practices.

Unlike traditional media, which are subject to consolidated rules on campaign monitoring and equality of exposure, online political communication in Albania remains fragmented, self-regulated, and only partially transparent. This creates particularly favourable conditions for structural inequalities among political actors, non-transparent use of digital advertising, third-party interference, and artificial audience amplification techniques. All of these elements significantly increase vulnerability to information manipulation and FIMI.

This domain analyses four vulnerabilities related to social media, platforms, and the digital space:

- the absence of a regulatory framework and effective oversight over digital platforms;
- the inequality in the use of social media and the weaknesses of political actors' self-regulation;
- the lack of transparency and accountability in online political advertising; and
- the role of third parties and the use of artificial audience amplification techniques.

Taken together, these vulnerabilities reveal a digital environment in which major platforms, political actors, informal structures, and coordinated information networks can operate with minimal consequences, undermining the level playing field, financial transparency, and the integrity of online political communication during elections.

Unregulated
platforms
operate without
transparency
obligations during
elections.

Lack of a legal framework for regulating digital platforms

Digital spaces and social media platforms are today among the main environments for political communication and shape public opinion during electoral processes. However, in Albania, these platforms remain largely unregulated and insufficiently monitored, creating structural vulnerabilities to information manipulation, including FIMI practices.¹¹⁸

Reports by International IDEA highlight that Albania is still at an early and fragmented stage of alignment with European standards for digital platform governance. Particularly problematic is the lack of regulation regarding algorithmic transparency, moderation of political content, reporting of online political advertisements, and accountability of digital intermediaries.¹¹⁹ While the EU Digital Services Act (DSA), Artificial Intelligence Act, and Digital Markets Act (DMA) impose clear obligations on major platforms in the European Union, these instruments have not yet been transposed or effectively implemented in the Albanian context.¹²⁰ Consequently, global platforms operate in Albania without clear legal obligations for transparency, reporting, or cooperation with domestic authorities, including during electoral periods.

The absence of a regulatory framework is accompanied by a significant oversight gap and a lack of accountability from platforms. The OSCE/ODIHR noted that no authority was mandated to address manipulative content or coordinated inauthentic behaviour in the digital space.¹²¹ Unlike traditional audiovisual media, which are subject to monitoring by the Audiovisual Media Authority (AMA) during election campaigns, digital spaces remain practically outside any comparable regime.

In the absence of legal obligations, major global platforms have not allocated sufficient resources for content moderation in the Albanian language. Reports from the European Commission and civil society indicate that platforms such as Facebook, Instagram, TikTok, and YouTube have allocated very limited capacities for proactive moderation of content in Albanian, particularly political content, disinformation, or incitement to hatred.¹²² This lack of linguistic and contextual moderation significantly increases the exposure of the Albanian

¹¹⁸ OSCE/ODIHR. (2025). *Preliminary Findings and Conclusions – Parliamentary Elections in Albania, 11 May 2025*. Warsaw. https://odihr.osce.org/sites/default/files/f/documents/4/f/590598_4.pdf

¹¹⁹ Bojadzievska, I., Cabacenco, P., Ivasyk, S. & Reçi, M. (2025). *Navigating the European Union's Digital Regulatory Framework: Part 2. Perspectives on Electoral Processes in EU Candidate Countries*. International IDEA. Stockholm. <https://www.idea.int/sites/default/files/2025-10/navigating-eu-digital-regulatory-framework-part2.pdf>

¹²⁰ European Commission. (2025). *Albania 2025 Report*. Brussels. https://enlargement.ec.europa.eu/document/download/fe9138b7-90fe-4277-a12c-3a03f6d1957f_en

¹²¹ OSCE/ODIHR. (2025). *Republic of Albania: Parliamentary Elections, 11 May 2025 – Final Report*. Warsaw. <https://odihr.osce.org/sites/default/files/f/documents/0/c/600028.pdf>

¹²² European Commission. (2025). *Albania 2025 Report*. Brussels. https://enlargement.ec.europa.eu/document/download/fe9138b7-90fe-4277-a12c-3a03f6d1957f_en

audience to manipulated narratives, including foreign-origin content, which can circulate across different platforms for extended periods without being identified or addressed.

During the 2025 electoral cycle, the government decided to block the TikTok platform in Albania for one year in response to concerns over the protection of minors. This decision was made in the absence of a specific legal framework for regulating digital platforms, with no transparency regarding the criteria and implementation mechanisms, and was challenged in the Constitutional Court.¹²³

In its Final Report on the 2025 Parliamentary Elections, the OSCE/ODIHR noted that the TikTok ban raised serious concerns regarding proportionality, the lack of procedural safeguards, and the potential impact on freedom of expression and equality in online political communication. The ODIHR emphasizes that, while states have the right to address risks in the digital space, broad and non-targeted measures risk undermining democratic standards, particularly during election campaigns.¹²⁴

Independent reports indicate that the TikTok ban was not implemented consistently, while the use of Deep Packet Inspection (DPI) technology to enforce the technical blocking of the platform raised concerns regarding personal data protection and the lack of a clear legal basis.^{125 126 127} Furthermore, the measure was not accompanied by alternative regulatory approaches, transparency mechanisms, or sustainable content moderation policies on other platforms, highlighting a reactive and fragmented approach to digital governance and complicating the landscape under conditions of missing regulation.

In this context, the absence of legal obligations and platform accountability has created a fragmented and easily exploitable digital environment, where political actors, third parties, coordinated networks, and even the platforms themselves can operate without consequences for violations. This situation is linked to **Enabler 11. Fragmented digital information environments**, **Enabler 12. Exploitability of digital and social media technologies**, **Enabler 15. Gaps in media and Internet regulations** and **Enabler 16. Unclear applicability of international norms**, as well as **Incentive 3. Weaponization of foreign media funding** and **Incentive 4. Availability of foreign-sourced news content**.

¹²³ Sinoruka, F. (2025, January 20). Kryeministri Rama nën kritika për ndalimin e TikTok në vitin zgjedhor [Prime Minister Rama faces criticism over TikTok ban in an election year]. *Reporter.al*. <https://www.reporter.al/2025/01/20/kryeministri-rama-nen-kritika-per-ndalimin-e-tiktok-ne-vitin-zgjedhor/>

¹²⁴ OSCE/ODIHR. (2025). *Republic of Albania: Parliamentary Elections, 11 May 2025 – Final Report*. Warsaw. <https://odhr.osce.org/sites/default/files/f/documents/0/c/600028.pdf>

¹²⁵ Sinoruka, F. (2025, March 23). Ndalimi kontrovers i TikTok në Shqipëri ende nuk po funksionon plotësisht [Albania's controversial TikTok ban still not fully implemented]. *Reporter.al*. <https://www.reporter.al/2025/03/23/ndalimi-kontrovers-i-tiktok-ne-shqiperi-ende-nuk-po-funksionon-plotesisht/>

¹²⁶ Bogdani, N. (2025, March 25). Vendimi për mbylljen e TikTok në Shqipëri sfidohet në Gjykatën Kushtetuese [Decision to shut down TikTok in Albania challenged at the Constitutional Court]. *Reporter.al*. <https://www.reporter.al/2025/03/25/vendimi-per-mbylljen-e-tiktok-ne-shqiperi-sfidohet-ne-gjykate-kushtetuese/>

¹²⁷ Bogdani, N. (2025, April 7). Masat për mbylljen e TikTok ngrenë shqetësime për cenimin e të dhënave personale [TikTok shutdown measures raise concerns over personal data protection]. *Reporter.al*. <https://www.reporter.al/2025/04/07/masat-per-mbylljen-e-tiktok-ngrene-shqetesime-per-cenimin-e-te-dhenave-personale/>

In the absence of accountability and moderation mechanisms in the Albanian language, digital platforms in Albania remain among the weakest points during electoral processes. This vulnerability is not limited to isolated cases but constitutes a structural condition that amplifies risks of information manipulation and undermines transparency, equality, and the integrity of online political communication.

Resource
asymmetries
and weak self-
regulation
entrench digital
campaign
dominance.

Inequality in resources and the limitations of digital campaign self-regulation

During the 2025 parliamentary elections, social media consolidated as one of the main channels for political communication in Albania, playing a direct role in shaping public discourse and electoral mobilization, and amplifying political messages. However, their use by political actors was characterized by pronounced structural inequalities, lack of transparency, and repeated instances of misuse of institutional communication, creating an unbalanced and vulnerable digital environment for information manipulation.

The OSCE/ODIHR Election Observation Mission noted that electoral subjects extensively used social media during the campaign, particularly Facebook and Instagram, contributing to the intensification of polarizing discourse in the absence of clear accountability mechanisms. The ODIHR notes that although online campaigning is not regulated by the Electoral Code, the massive use of social media had a direct impact on the electoral climate, while “no authority was mandated to identify or address manipulative content or coordinated inauthentic behaviour online”.¹²⁸

These findings position the digital space as a key domain where structural inequalities and regulatory gaps directly translate into advantages for dominant actors.

In the absence of legal regulation of political actors' accountability, ahead of the 2025 campaign, some political parties signed a Code of Conduct for Digital Campaigns. This Code, a voluntary self-regulatory mechanism facilitated by civil society and international partners, aimed to promote transparency, ethics, and responsibility in online communication. However, the Code represents a voluntary political commitment rather than a legally binding instrument.¹²⁹

Monitoring findings by BIRN Albania and International IDEA of the digital campaign showed that self-regulation was insufficient, as signing the Code

¹²⁸ OSCE/ODIHR. (2025). *Preliminary Findings and Conclusions – Parliamentary Elections in Albania, 11 May 2025*. Warsaw. https://odihr.osce.org/sites/default/files/f/documents/4/f/590598_4.pdf

¹²⁹ Gjoncaj, M. & Shehu, J. (2025). Albanian parties adopt code of conduct on digital campaigns. International IDEA. <https://www.idea.int/news/albanian-parties-adopt-code-conduct-digital-campaigns>

was not accompanied by visible changes in online communication practices by parties and candidates. Repeated violations were identified, including lack of transparency regarding sponsored content, use of polarizing language, and involvement of third parties in amplifying political messages (see illustrative case below).¹³⁰

Data from monitoring indicates a strong dominance of the two main political parties on Facebook and Instagram, in both post volume and audience engagement (likes, comments, shares). During the official campaign period, digital communication was concentrated on leader profiles and their affiliated support pages, while smaller parties and new candidates had very limited visibility, often relying solely on organic engagement.

This inequality, in addition to unequal advertising, is also linked to differences in access to coordinated networks, professional staff for content management, and the capacity to produce personalized and continuous visual material. In this way, social media reflected and reinforced existing inequalities in traditional media, creating “echo chambers” around key political leaders.

A particularly problematic element of this campaign was the use of official pages and profiles of public institutions on social media for electoral purposes. Monitoring documented cases where content published as “informative” by public institutions clearly aligned with the messages and images of ruling party candidates’ campaigns.¹³¹

Cases documented by BIRN Albania, including the use of institutional pages by various ministers during the campaign, highlighted the lack of separation between public information and electoral propaganda, as well as the tolerant approach of supervisory institutions towards these practices.^{132 133} These cases show that inequality in social media use stems not only from parties’ capacities but also from the instrumentalization of public resources for electoral purposes.

In response to growing concerns regarding digital campaigns, the Central Election Commission took an initiative to establish a unit dedicated to monitoring social media during the 2025 elections. This initiative aimed to increase institutional capacities to identify violations and improve transparency in the online space.

¹³⁰ Likmeta, B. & Voko, K. (2025). *Social Media Monitoring: Albania's Parliamentary Elections 2025*. International IDEA. Stockholm. https://www.idea.int/sites/default/files/2025-07/social-media-monitoring-albanias-parliamentary-elections-2025_0.pdf

¹³¹ Qendra Qytetare (QQ). (2025). *Raport mbi denoncimet e Qendrës “Qëndresa Qytetare” për zgjedhjet për Kuvend, 11 maj 2025* [Report on citizen complaints related to the 11 May 2025 parliamentary elections]. <https://qq.com.al/wp-content/uploads/2025/06/Raport-mbi-denoncimet-e-zgjedhjeve.pdf>

¹³² Karaj, V. (2025, April 18). Ministri Balluku i përdor faqet e institucioneve si “mur” për posterat e fushatës [Minister Balluku uses institutional pages as campaign billboards]. *Reporter.al*. <https://www.reporter.al/2025/04/18/ministrja-balluku-i-perdor-faqet-e-institucioneve-si-mur-per-posterat-e-fushates/>

¹³³ Karaj, V. (2025, April 23). “Me natyrë informuese”: KQZ i shkel syrin “propagandës” së institucioneve publike për Belinda Ballukun [“Under the guise of information”: the CEC enables “propaganda” by public institutions for Belinda Balluku]. *Reporter.al*. <https://www.reporter.al/2025/04/23/me-natyre-informuese-kqz-i-shkel-syrin-propagandes-se-institucioneve-publike-per-belinda-ballukun/>

However, by the conclusion of the electoral process, this unit did not produce public findings or detailed reports on social media use by electoral subjects. The lack of clear legal powers, technical resources, and specialized expertise significantly limited the effectiveness of this initiative, leaving digital space monitoring largely in the hands of independent actors.

From a methodological perspective, this vulnerability is directly linked to **Enabler 12. Exploitability of digital and social media technologies** and **Enabler 13. Inconsistent and lax moderation policies**, as well as **Incentive 1. Engagement-driven media business models** and **Incentive 2. The online political advertising market**. Inequality in social media use, combined with misuse of public resources and the lack of effective oversight, creates an environment where information manipulation and third-party interference can continue with minimal consequences.

Illustrative case: Implementation of the Code of Conduct for Digital Campaigns and the limitations of self-regulation

During the period from 11 April to 11 May,¹³⁴ BIRN Albania documented a total of 349 violations of the Code of Conduct for Digital Campaigns by political parties and candidates who had voluntarily committed to comply with the Code. The majority of violations—55%—were attributed to candidates from the ruling Socialist Party, followed by the coalition led by the Democratic Party, Alliance for a Greater Albania, with 17.5%. The initiative Shqipëria Behet (The Albania Becomes Initiative) coalition and Mundesia Party accounted for 10.9% and 6.3% of violations respectively, while the remaining 10.3% were committed by other electoral subjects. The number of violations increased significantly during the second half of the campaign, particularly among candidates from the Socialist Party, as election day approached.

One of the most frequently observed issues was the lack of transparency in sponsored content, with political posts and advertisements disseminated without clear identification of the sponsor or the source of funding. This practice made it difficult for the public to distinguish between organic political communication and paid content, undermining one of the core principles of the Code.

The report also highlights unethical uses of technology, particularly the dissemination of artificial intelligence-generated content without transparency or appropriate labelling. A smaller but still significant share of violations (9.7%) related to breaches of the electoral silence, exclusionary political discourse, and other violations that undermine democratic principles.

¹³⁴ Likmeta, B. & Voko, K. (2025). *Social Media Monitoring: Albania's Parliamentary Elections. 2025*. International IDEA. Stockholm. https://www.idea.int/sites/default/files/2025-07/social-media-monitoring-albanias-parliamentary-elections-2025_0.pdf

The Code of Conduct remained a voluntary instrument, not legally binding and without a designated authority responsible for overseeing its implementation. Documented violations were not accompanied by corrective measures or sanctions, significantly limiting the deterrent effect of the Code. Although the Central Election Commission took steps to establish a dedicated unit to monitor social media during the campaign, institutional capacities remained insufficient to address the volume and complexity of digital content during the campaign.

Overall, the monitoring of the Code of Conduct for Digital Campaigns shows that self-regulation, in the absence of a binding legal framework and effective enforcement mechanisms, is insufficient to guarantee the integrity of online campaigning. In their absence, the digital space remains particularly exposed to FIMI practices during electoral processes in Albania.

Lack of transparency and accountability for digital political advertising

Political advertising on digital platforms has become an increasingly important component of electoral campaigns in Albania, while simultaneously remaining one of the most problematic areas in terms of transparency, oversight, and accountability. During recent electoral cycles, including the 2025 parliamentary elections, the absence of specific regulations for online political advertising and structural weaknesses in the financial reporting system have created a favourable environment for undeclared spending, unidentified advertisements, and third-party interference in political communication.

Transparency problems are not new. As early as the 2021 parliamentary elections, BIRN Albania documented that over 75% of political advertisements on Facebook and Instagram did not clearly identify the sponsor or source of funding, violating basic transparency principles and making it impossible to trace the real costs of digital campaigning.¹³⁵ This high level of opacity created space for selective audience targeting, the use of manipulative content, and the circumvention of oversight by the CEC.

Similar issues persisted during the 2023 local elections. Analysis of financial reports submitted by electoral subjects revealed significant discrepancies between the actual volume of activity on digital platforms and the figures

Opaque digital advertising facilitates undeclared spending and covert influence.

¹³⁵ Likmeta, B. (2021, April 28). Partitë politike shpenzuan 299 mijë USD gjatë fushatës për reklama në Facebook [Political parties spent 299,000 USD on Facebook ads during the campaign]. *Reporter.al*. <https://www.reporter.al/2021/04/28/partite-politike-shpenzuan-299-mije-usd-gjate-fushates-per-reklama-ne-facebook/>

officially declared, raising serious questions about the auditing process and the verification of expenditures.¹³⁶ Social media monitoring during that electoral process confirmed that political advertisements were widely used in the digital space, despite formal declarations that in many cases reported zero spending.¹³⁷

OSCE/ODIHR reports have repeatedly emphasized that the lack of transparency surrounding political advertising in the digital space and the unclear role of third parties constitute one of the main gaps affecting electoral integrity in Albania. In its assessments of the 2025 elections, the ODIHR underlined that social media campaigns remain outside a clear regulatory framework and that there is no effective mechanism for identifying sponsors, monitoring expenditures, or enforcing sanctions for detected violations.¹³⁸

Along the same lines, International IDEA, in its analysis of the alignment of Western Balkan countries' legislation with the EU digital framework, notes that Albania still lacks functional mechanisms to implement standards stemming from the Digital Services Act (DSA), particularly with regard to political advertising transparency, public ad archives, and platform accountability for cooperation with electoral authorities.¹³⁹ This situation leaves control over political advertising in the digital space almost entirely in the hands of private platforms and the political actors themselves.

During the 2025 parliamentary elections, social media monitoring conducted by BIRN Albania and International IDEA confirmed the persistence of these problems. Dozens of cases of unidentified or ambiguously labelled political advertisements were identified, including ads published by individual candidates and third-party pages. A considerable number of these advertisements continued to circulate during the period of electoral silence, undermining the principle of equality in the race and the effectiveness of existing rules¹⁴⁰ (see illustrative case below).

From a methodological perspective, this vulnerability is linked to **Enabler 12. Exploitability of digital and social media technologies**, and **Enabler 13. Inconsistent and lax moderation policies**. At the same time, it interacts with

¹³⁶ Barjamemaj, A. 2024, November 13. Raportet financiare të partive politike: Çfarë fshehin shifrat zyrtare? [Political party financial reports: What do the official figures hide?] *Reporter.al*. <https://www.reporter.al/2024/11/13/raportet-financiare-te-partive-politike-cfare-fshehin-shifrat-zyrtare/>

¹³⁷ Voko, K., Likmeta, B. & Erebara, G. (2023). *Albania Local Elections 2023: Social Media Monitoring*. BIRN Albania. Tirana. https://birn.eu.com/wp-content/uploads/2025/01/Social-Media-Monitoring_Elections-2023_Albania_Eng-1.pdf

¹³⁸ OSCE/ODIHR. (2025). *Republic of Albania: Parliamentary Elections, 11 May 2025 – Final Report*. Warsaw. <https://odihr.osce.org/sites/default/files/f/documents/0/c/600028.pdf>

¹³⁹ Bojadzievska, I., Cabacenco, P., Ivasyk, S. & Reçi, M. (2025). *Navigating the EU Digital Regulatory Framework: Part 2. Perspectives on Electoral Processes in EU Candidate Countries*. International IDEA. Stockholm. <https://www.idea.int/sites/default/files/2025-10/navigating-eu-digital-regulatory-framework-part2.pdf>

¹⁴⁰ Likmeta, B. & Voko, K. (2025). *Social Media Monitoring: Albania's Parliamentary Elections 2025*. International IDEA. Stockholm. https://www.idea.int/sites/default/files/2025-07/social-media-monitoring-albanias-parliamentary-elections-2025_0.pdf

Incentive 1. Engagement-driven media business models, and **Incentive 2. The online political advertising market**, creating strong incentives for the use of questionable, undeclared, or disguised advertisements presented as organic content.

Illustrative case: Online political advertising during the 2025 parliamentary elections

Monitoring of online political advertising during the 11 May, 2025 parliamentary elections confirms that, despite a relative increase in transparency on Meta platforms through the Ad Library, the digital space remains deeply unbalanced, highly personalized, and only partially auditable, creating conditions for the circumvention of rules intended to safeguard electoral integrity.

During the monitored campaign period, parliamentary candidates and political parties ran a total of 4,651 political advertisements on Meta platforms (Facebook, Instagram, Audience Network, and Messenger). These included advertisements published directly by political parties as well as ads sponsored by individual candidates. In financial terms, parties and candidates spent a total of 265,985 USD on advertising on Meta platforms. Of this amount, 64,528 USD was spent by political parties, while 201,457 USD was spent by individual candidates. The Central Election Commission spent 2,432 USD on voter information campaigns.

During the campaign, the Socialist Party and the Democratic Party also ran political advertisements on Google platforms. According to the Google Ad Transparency Centre, each party published five advertisements, mainly in the form of banners and videos. However, the lack of data on spending, audience targeting, and reach of these ads makes it impossible to assess their impact.

BIRN Albania's monitoring also identified two large-scale email campaigns. Although the content was clearly promotional and aimed at electoral mobilization, there is no public information regarding their reach, distribution lists, or financial costs.

Despite a public warning issued by the State Election Commissioner on 10 May, BIRN Albania's monitoring identified 77 candidates and one political subject that continued to publish political advertisements during the period of electoral silence (10–11 May). These advertisements were distributed mainly on Facebook and Instagram and included both sponsored content and campaign video materials.

Throughout the campaign, 165 political advertisements published by candidates were also identified without the required transparency disclosures. The absence of such disclosures undermines voters' right to understand who stands behind political messages and weakens financial accountability in the campaign.

This illustrative case shows that, even though Meta platforms provide a minimum

level of transparency, online political advertising in Albania remains fragmented, personalized, and only partially monitored. Other channels (e.g., platforms such as Google) remain outside any auditing mechanism, while violations during the electoral silence period and unidentified advertisements demonstrate the limitations of the current regulatory and self-regulatory approach. In the absence of comprehensive legal obligations and effective oversight mechanisms, online political advertising continues to represent one of the weakest points in terms of transparency and equality in the electoral process.

Third-party
networks
and artificial
amplification
distort visibility
and public
perception.

Third parties and non-transparent interference in digital campaigns

One of the key gaps in Albania's electoral framework relates to the role and involvement of third parties in electoral processes. Despite repeated OSCE/ODIHR recommendations over the years, including in the 2021 parliamentary elections and the 2023 local elections, electoral legislation has not fully addressed transparency, financial reporting, and oversight of third-party activities engaged in political campaigning or parallel electoral communication alongside official political actors.¹⁴¹

The 2021 parliamentary elections marked a critical moment in the public exposure of this vulnerability. BIRN's investigation entitled "Untold Story: Dark Money, Israeli Advisers and an Albanian Election" documented the systematic use of undeclared funds and the involvement of foreign political consultants in the campaigns of the two main political parties.¹⁴² The investigation identified a network of anonymous Facebook pages that disseminated targeted political advertisements against opposition figures without disclosing the source of funding. These pages reached more than 51 million views over a relatively short period, despite having only a few thousand followers, suggesting intensive use of paid advertising financed through undeclared sources.

The data also showed that administrators of some of these pages were located outside Albania, primarily in Israel, while foreign political consultants were found to be directly involved in the electoral campaign. These practices circumvented both the transparency policies of digital platforms themselves and national financial reporting mechanisms, creating a parallel, non-auditable channel of influence over public opinion.

¹⁴¹ OSCE/ODIHR. (2025). *Republic of Albania: Parliamentary Elections, 11 May 2025 – Final Report*. Warsaw. <https://odihr.osce.org/sites/default/files/f/documents/0/c/600028.pdf>

¹⁴² Likmeta, B. (2021, June 1). "Untold story": Dark money, Israeli advisers and an Albanian election. *Balkan Insight*. <https://balkaninsight.com/2021/06/01/untold-story-dark-money-israeli-advisers-and-an-albanian-election/>

The shortcomings identified in 2021 remained unaddressed in subsequent electoral cycles. During the 2023 local elections, spending on political advertising—particularly in the digital space—continued to be underreported or concealed through third parties, while the Central Election Commission's financial audit process remained largely limited to formal checks.¹⁴³ ¹⁴⁴ Similarly, during the 2025 parliamentary elections, BIRN monitoring identified a broad presence of third parties involved in digital campaigning and audience amplification techniques (see the illustrative case below).

These developments place third-party involvement at the centre of the risk of foreign interference and electoral information manipulation, including FIMI. The lack of regulation of third-party campaign activities and the absence of transparency regarding their financial sources are linked to **Enabler 12. Exploitability of digital and social media technologies, Incentive 5. Information manipulation for hire**, and **Incentive 6. Information manipulation jobs**.

During 2024–2025, Albania undertook its first political commitments to address this gap. The National Strategy against Foreign Interference and Disinformation, adopted in July 2025, identifies the regulation of third parties and the strengthening of financial reporting mechanisms as a priority objective.¹⁴⁵ In addition, the Roadmap for the Functioning of Democratic Institutions provides, among other things, measures to enhance transparency and prevent undeclared influence in electoral processes.¹⁴⁶ However, these commitments have not yet been translated into the electoral legislation.

In the absence of a binding legal framework for third parties, the digital space and social media continue to function as an ideal environment for informal coordinated campaigns, undeclared financing, and interference by foreign actors. This makes this vulnerability one of the most critical for electoral integrity in Albania and a key element in the analysis of FIMI-related risks.

¹⁴³ Likmeta, B. (2021, November 23). Partitë fshehën miliona euro shpenzime për propagandë elektorale në zgjedhje [Political parties hid millions of euros in electoral propaganda spending]. *Reporter.al*. <https://www.reporter.al/2021/11/23/partite-fshehen-miliona-euro-shpenzime-per-propagande-elektorale-ne-zgjedhje/>

¹⁴⁴ Barjamemaj, A. (2024, November 13). Raportet financiare të partive politike: Çfarë fshehin shifrat zyrtare? [Political party financial reports: What do the official figures hide?]. *Reporter.al*. <https://www.reporter.al/2024/11/13/raportet-financiare-te-partive-politike-cfare-fshehin-shifrat-zyrtare/>

¹⁴⁵ Assembly of the Republic of Albania. (2025). *Ligj nr. 47, datë 3 korrik 2025, për miratimin e Strategjisë Kombëtare kundër Ndërhyrjeve të Huaja* [Law No. 47, dated 3 July 2025, on the approval of the National Strategy against Foreign Interference]. <https://kuvendiwebfiles.blob.core.windows.net/webfiles/202507170801443359Ligj%20nr.%2047%2C%20dt%203.7.2025.pdf>

¹⁴⁶ Council of Ministers of Albania. (2024). *Vendim nr. 611, datë 2 tetor 2024, për miratimin e Udhërrëfyesit për Funksionimin e Institucioneve Demokratike* [Decision no. 611, 2 October 2024, On the Approval of the Guide for the Functioning of Democratic Institutions]. <https://www.drejtesia.gov.al/wp-content/uploads/2024/10/VKM-nr.-611-date-2.10.2024-Per-miratimin-e-Udherrefyesit-per-Funksionimin-e-Institucioneve-Demokratike.pdf>

Illustrative case: Third parties and artificial audience amplification techniques during the 2025 elections

During the monitoring of the electoral campaign for the 11 May 2025 parliamentary elections, BIRN paid particular attention to the activity of third parties on social media—pages and accounts that did not represent official political actors, candidates, or verified media outlets, yet nonetheless engaged actively in promoting or attacking political actors throughout the campaign.

During the campaign period, 58 such third-party pages engaging in clearly political activity were identified. These pages were involved in a range of problematic practices, including the dissemination of manipulative or false content, the use of paid advertising without transparent disclosures, the artificial amplification of content through inauthentic behaviour, and advertising campaigns targeting the Albanian diaspora, particularly in Italy.¹⁴⁷

A common characteristic of most of these pages was the absence of reliable data on spending. Many operated outside Meta's classification of "political or social issues" (Meta Ad Library), thereby avoiding existing transparency mechanisms. Nevertheless, in some cases partial data were identified: the page "Team Edi Rama" spent approximately 1,222 USD; "themuslimvote.al" around 115 USD; "Gratë votojnë Gratë" approximately 200 USD; while the page "Shqipëria në BE" spent around 2,663 EUR, primarily on advertisements targeting voters in the diaspora.

Although many of these pages had a relatively small number of followers, the engagement generated and their reach were disproportionate, owing to the use of paid advertising, emotionally charged content, and artificial amplification techniques. An illustrative example is the Facebook page "Team Edi Rama", created on 19 March 2025, shortly before the official start of the campaign. By 10 May, the page had approximately 6,600 followers, yet it achieved 4.6 million video views and more than 70,000 interactions in less than two months. Data analysis shows clear "spikes" in activity in early April, early May, and in the final days of the campaign—patterns indicative of coordinated promotion or artificial audience boosting.

The monitoring also identified coordinated artificial amplification strategies, particularly among pages operating outside official party structures. In the case of "Team Edi Rama", the extraordinarily high levels of views and engagement, relative to the number of followers, were accompanied by evidence of the use of coordinated networks and bots. Many of the accounts interacting with the content originated from Vietnam and other Southeast Asian countries, while simulating organic engagement through likes, shares, and comments in order to inflate audience reach.

¹⁴⁷ Likmeta, B., & Voko, K. (2025). *Social Media Monitoring: Albania's Parliamentary Elections 2025*. International IDEA. Stockholm. https://www.idea.int/sites/default/files/2025-07/social-media-monitoring-albanias-parliamentary-elections-2025_0.pdf

These tactics were not limited to third-party pages alone. On 9 May 2025, during the Facebook livestream of Prime Minister Edi Rama's final televised interview on the programme *Opinion* (TV Klan), an immediate surge of comments from suspicious profiles was observed, displaying characteristics similar to those previously identified on third-party pages. The behavioural patterns suggest the use of the same amplification methods to create the perception of broad public support.¹⁴⁸

These findings demonstrate that third parties constitute one of the most sensitive vectors for digital manipulation in Albania. They operate within a regulatory grey zone, with low costs and minimal risk of sanction, exploiting the fragmentation of the digital information environment and the absence of effective accountability mechanisms. The use of anonymous pages and profiles, unidentified advertising, and inauthentic behaviour creates an environment in which public perception can be deliberately distorted, without transparency or accountability.

Domain 5

Digitalization of electoral processes and cybersecurity

The digitalization of electoral processes in Albania has advanced significantly over recent electoral cycles. This has included the electronic identification of voters, the piloting of new technologies for counting, registration and diaspora voting, as well as the use of digital platforms for political finance reporting and the administration of electoral data. These developments are intended to enhance the efficiency, integrity, and transparency of the electoral process, but they also generate new forms of vulnerability, particularly in the absence of independent auditing, clear public communication, and consolidated cybersecurity capacities.

This domain focuses on two main vulnerabilities:

- risks arising from the digitalization of electoral processes and limited capacities for auditing, transparency, and the secure use of systems; and
- the exposure of electoral infrastructure to cyberattacks and hybrid threats, including the misuse of data, and their impact on public trust.

¹⁴⁸ Karaj, V. (2025, May 10). Profilet në Facebook nga Vietnami përmytin intervistën e Ramës në Opinion. [Facebook profiles from Vietnam flood Rama's interview on Opinion.] *Reporter.al*. <https://www.reporter.al/2025/05/10/profilet-ne-facebook-nga-vietnami-permytin-intervisten-e-rames-ne-opinion/>

The analysis is directly linked to **Enabler 6. Audience susceptibility to manipulation**, **Enabler 15. Gaps in media and Internet regulations**, and **Enabler 16. Unclear applicability of international norms**, underscoring that cybersecurity and public communication are core components of democratic resilience to FIMI.

Electoral
digitalization
outpaces auditing,
transparency,
and oversight
safeguards.

Digitalization of electoral processes and risks of information manipulation

The digitalization of electoral processes in Albania over recent electoral cycles has included electronic voter identification, the digital administration of voter lists, the registration and voting of the diaspora, and the use of online platforms for financial reporting and data management by the Central Election Commission. These developments aim to increase the efficiency and integrity of the electoral process, but they also create new forms of vulnerability, particularly in the absence of independent auditing, transparency, and clear public communication regarding the functioning and limitations of digital systems.

The use of electoral technologies in Albania, including biometric identification, has generally been managed without incidents that would affect electoral outcomes. However, the OSCE/ODIHR notes that technological processes have been accompanied by a lack of transparency regarding security testing, independent audits, and public explanations of protective mechanisms, which has affected perceptions of their reliability among segments of the electorate. These technical ambiguities do not necessarily constitute functional weaknesses, but they create space for misinterpretation, doubt, and the political instrumentalization of electoral technology.¹⁴⁹

A key element in this context is Albania's history of personal data breaches.¹⁵⁰ Previous leaks of state databases and the misuse of voter data by political actors have contributed to the social normalization of privacy violations and reduced public sensitivity to risks associated with the political use of personal data. This documented history of data misuse creates a problematic backdrop against which new digitally enabled electoral processes are being implemented, making it more difficult to build public trust even where systems incorporate advanced security measures.

Although Albania has adopted a new legal framework on personal data protection,

¹⁴⁹ OSCE/ODIHR. (2025). *Republic of Albania: Parliamentary Elections, 11 May 2025 – Final Report*. Warsaw. <https://odihr.osce.org/sites/default/files/f/documents/0/c/600028.pdf>

¹⁵⁰ Achten, N., Glusac, L., Mikova, R., Fuior, T., Reci, M. & Kelmendi, S. (2024). *Accountability in Cybersecurity*. DCAF – Geneva Centre for Security Sector Governance. Geneva. <https://www.dcaf.ch/accountability-cybersecurity>

broadly aligned with the European Union's General Data Protection Regulation (GDPR), reports by the European Commission and civil society organizations underline that effective implementation remains weak, while institutional capacities for oversight, investigation, and sanctioning are limited.¹⁵¹ Guidelines issued by the Commissioner for Personal Data Protection exist at a normative level,¹⁵² but awareness and compliance among public institutions and political actors remain fragmented, particularly in sensitive contexts such as electoral campaigns.¹⁵³ Independent reports on digital technologies in recent electoral cycles highlight that digitalization has advanced faster than the development of credible mechanisms for control, transparency, and accountability in the use of data.

An additional factor amplifying this vulnerability is the low level of digital literacy across different segments of society, including voters, public administration, and political actors.¹⁵⁴ The lack of basic knowledge about the functioning of digital systems and about the rights related to the protection of personal data simultaneously increases scepticism and vulnerability to disinformation narratives.¹⁵⁵ In such an environment, even technically well-managed processes can be portrayed as insecure or manipulated, undermining public trust in the integrity of elections.

In this context, the digitalization of electoral processes in Albania represents a dual vulnerability: on the one hand, technical and institutional risks related to data protection and system security; on the other hand, risks of misinformation and disinformation stemming from a lack of transparency, a legacy of past breaches, and insufficient public communication. This combination creates favourable conditions for the amplification of fear-based narratives and the delegitimization of electoral processes.

From a methodological perspective, these challenges are directly linked to **Enabler 6. Audience susceptibility to manipulation**, **Enabler 15. Gaps in media and Internet regulations**, and **Enabler 16. Unclear applicability of international norms**.

¹⁵¹ Brojka, A. (2025). *Digital Technologies in the Election Cycle: The Case of Albanian Parliamentary Elections in 2025*. Institute for Democracy and Mediation. https://idmalbania.org/wp-content/uploads/dlm_uploads/2025/09/Policy-Brief-Digital-Technologies-in-the-Election-Cycle.pdf

¹⁵² Commissioner for Personal Data Protection (IDP). (2024). *Udhëzues për përpunimin e të dhënave personale në kontekstin e fushatave zgjedhore* [Guidelines on the processing of personal data in the context of electoral campaigns]. https://www.idp.al/wp-content/uploads/2024/02/Udhezues_Faqosur-4-prill.pdf

¹⁵³ Bojadzievska, I., Cabacenco, P., Ivasyk, S. & Reçi, M. (2025). *Navigating the European Union's Digital Regulatory Framework: Part 2. Perspectives on Electoral Processes in EU Candidate Countries*. International IDEA. Stockholm. <https://www.idea.int/sites/default/files/2025-10/navigating-eu-digital-regulatory-framework-part2.pdf>

¹⁵⁴ Likmeta, B., & Voko, K. (2025). *Monitoring Media Pluralism in the European Union: Results of the MPM2025. Country Report: Albania*. European University Institute, Centre for Media Pluralism and Media Freedom (CMPF). Florence. <https://cadmus.eui.eu/entities/publication/f5be0d78-00ae-4b29-aadb-b487390fcbf2>

¹⁵⁵ IDRA Research & Consulting & Communication Progress. (2024). *Assessing Municipal and Public e-Readiness in Albania: National Report*. https://www.undp.org/sites/g/files/zskgke326/files/2024-09/dra_national_report_final_eng.pdf

Illustrative case: Electronic platform for reporting election campaign financial expenditures

During the local elections of 14 May 2023, for the first time, the Central Election Commission (CEC) put into operation the [Electronic Platform for Financial Reporting \(PERF\)](#), through which electoral entities and candidates were required to submit their campaign financial reports digitally. This initiative was widely welcomed as an important step towards enhancing transparency and fulfilling the CEC's long-standing commitments to modernize electoral administration and improve public access to campaign finance data.

The platform was conceived as a tool that would not only standardize financial reporting, but also provide direct access for journalists, researchers, and citizens to review the financial statements of electoral contestants and candidates. However, its practical implementation revealed a number of structural shortcomings. While a significant number of electoral contestants and candidates failed to submit financial reports at all, for those who did comply, the platform did not allow data to be downloaded in machine-readable or processable formats. Reports were available only in PDF format, severely limiting opportunities for comparative analysis, statistical processing, and systematic oversight by independent actors. Moreover, the platform's design allowed several key fields to remain incomplete or to be reported inconsistently, without automated alerts to flag discrepancies or omissions.¹⁵⁶

In light of these criticisms, the CEC committed to reformatting the platform ahead of the 2025 parliamentary elections, with the aim of aligning it with open data principles and improving search, filtering, and download functionalities for financial information. However, these improvements were not implemented in time. As a result, financial reporting for the parliamentary elections of 11 May 2025—with a submission deadline of 4 November 2025—was once again conducted using the outdated version of the platform.

This situation not only reproduced the shortcomings identified in 2023, but also generated additional obstacles to transparency and oversight. The public, journalists, and researchers lacked access to specific navigation filters or the ability to search candidates by name in the database, and encountered technical hitches in identifying expenditures directly related to the 2025 elections. At the same time, electoral contestants and candidates themselves reported difficulties in using the system, opting instead for alternative reporting channels outside the digital platform.

¹⁵⁶ Voko, K., Likmeta, B. & Erebara, G. (2025). *Financial Reports of Electoral Subjects on the 2023 Electoral Campaign*. BIRN Albania. Tirana. <https://birn.eu.com/wp-content/uploads/2025/01/Analysis-of-the-Financial-Reports-of-Electoral-Subjects-on-the-2023-Electoral-Campaign-.pdf>

According to data provided by the CEC, out of 38 electoral contestants registered for the 2025 parliamentary elections, financial reports were submitted as follows: 11 contestants via the PERF electronic platform, 20 contestants through the standard reporting format approved by the Election Regulatory Commission, and 7 contestants did not submit any financial report to the CEC. The fact that the majority of contestants did not use the electronic platform, significantly undermined its role as a transparency instrument and constrained the capacity of institutions, the media, and civil society to exercise effective oversight of campaign financing.

This case illustrates that digitalization, in the absence of full functionality, broad usability, and adherence to open data standards, may result in only formal transparency. Without sufficient investment in design, testing, training, and public communication, digital platforms risk widening the gap between institutional ambitions and meaningful democratic accountability over electoral processes.

The cybersecurity of electoral infrastructure and exposure to hybrid attacks

The cybersecurity of electoral infrastructure constitutes a critical component of the integrity of democratic processes, particularly in a context where electoral processes increasingly rely on digital systems for data management, institutional communication, and the provision of services to voters. In Albania, this area was associated with heightened risks during the 2025 election year, exposing structural vulnerabilities in capacities for prevention, response, and public communication in the face of cyber incidents.

During the campaign for the 11 May 2025 parliamentary elections, the CEC stated that its digital platforms had been the target of cyberattacks.¹⁵⁷ According to official statements by the State Election Commissioner, these attacks targeted the official website and several supporting systems, causing temporary disruptions in access and increasing the need for emergency protective measures. Although the authorities emphasized that there was no evidence of compromise of electoral data or manipulation of results, the very occurrence of attacks during a critical phase of the electoral cycle is of particular significance for risk assessment and public perception.

Cyber vulnerabilities heighten susceptibility to distrust in election systems.

¹⁵⁷ Hoxhaj, E. (2025, May 22). Celibashi: Platformat e KQZ u përballën me sulme kibernetike gjatë zgjedhjeve [Celibashi: CEC platforms faced cyberattacks during the elections]. *Reporter.al*. <https://www.reporter.al/2025/05/22/celibashi-platformat-e-kqz-u-perballen-me-sulme-kibernetike-gjate-zgjedhjeve/>

Independent reports highlight that such incidents, even when technically managed without direct consequences, can have a disproportionate impact on public trust. The OSCE/ODIHR underlines that the lack of detailed information and proactive communication regarding the nature of the attacks, the protective measures taken, and post-incident audits creates space for speculation and disinformation narratives concerning the integrity of electoral processes.¹⁵⁸ In this sense, the risk is not limited to potential technical damage, but also extends to the information environment and public perception.

Cybersecurity vulnerabilities must also be viewed in light of the broader context of hybrid threats targeting public institutions in Albania. The major cyberattack against state systems in 2022, attributed to foreign actors, exposed structural weaknesses in the digital security architecture and directly contributed to increased political and societal sensitivity to similar incidents. Although the attacks reported against the Central Election Commission in 2025 have not been officially linked to foreign actors, they occurred in an environment where institutional and public memory of previous attacks amplifies their symbolic impact.

Reports by the European Commission and independent analyses of digital governance in Albania emphasize that, despite normative progress, cybersecurity remains fragmented across institutions, with uneven levels of preparedness and coordination.¹⁵⁹ Capacities for incident response, independent auditing, and post-incident transparency remain limited, particularly within institutions administering sensitive processes such as elections.¹⁶⁰ These weaknesses increase the risk that cyber incidents may be exploited by third-party actors to generate or amplify destabilizing narratives, even in the absence of an actual compromise of systems.

An additional source of concern relates to the absence of clear and publicly available protocols for communication during cyber incidents. In the case of the attacks on electoral platforms in 2025, the information made public was limited and general in nature, failing to fully address key questions regarding the scale of the attacks, their possible origin, and the measures taken to prevent similar incidents in the future. This approach to public communication and transparency contributes to increased information insecurity and reduces institutional resilience to the manipulation of public perception.

In this context, the cybersecurity of Albania's electoral infrastructure represents

¹⁵⁸ OSCE/ODIHR. (2025). *Republic of Albania: Parliamentary Elections, 11 May 2025 – Final Report*. Warsaw. <https://odihr.osce.org/sites/default/files/f/documents/0/c/600028.pdf>

¹⁵⁹ European Commission. (2025). *Albania 2025 Report*. Brussels. https://enlargement.ec.europa.eu/document/download/fe9138b7-90fe-4277-a12c-3a03f6d1957f_en

¹⁶⁰ Bojadzievska, I., Cabacenco, P., Ivasyk, S. & Reçi, M. (2025). *Navigating the European Union's Digital Regulatory Framework: Part 2. Perspectives on Electoral Processes in EU Candidate Countries*. International IDEA. Stockholm. <https://www.idea.int/sites/default/files/2025-10/navigating-eu-digital-regulatory-framework-part2.pdf>

a clear vulnerability to foreign interference. Any incident—real or perceived—can serve as a catalyst for narratives that question the integrity of elections, the credibility of institutions, and the legitimacy of electoral outcomes. This aligns to **Enabler 15. Gaps in media and Internet regulations**, and is closely related to **Enabler 6. Audience susceptibility to manipulation**, given that cyber incidents directly affect public perception and trust in digital electoral processes.

CONCLUSIONS

This report aimed to assess the structural vulnerabilities of electoral processes in Albania that may be exploited for interference and manipulation of the information environment during the electoral cycle. Drawing on International IDEA's global methodology, the analysis does not seek to prove the presence of foreign interference in each specific case, but rather to identify the systemic conditions that make an electoral process more exposed to foreign information manipulation and interference (FIMI), whether by foreign actors directly or through domestic intermediary networks.

The report's findings indicate that the vulnerabilities identified during the 2025 parliamentary elections are not episodic, but part of a broader institutional, regulatory, media, and digital configuration that produces recurring exposure to information manipulation. In this sense, FIMI does not appear as an external or randomly imported phenomenon, but as a risk that interacts with internal weaknesses of the system.

First, the analysis shows that electoral integrity in Albania relies on a normative architecture that provides formal principles, but not always effective protection against contemporary forms of information influence. The legal and regulatory framework—particularly in the areas of political finance, online political advertising, the role of third parties, and digital transparency—remains insufficiently prepared to address the challenges of modern campaigns and FIMI.

Second, the findings confirm that regulatory instability and late-stage reforms during the electoral cycle increase uncertainty, inequality of competition, and opportunities for contestation. Last-minute changes to rules on campaign financing, expenditures, and electoral communication are not only issues of classic electoral fairness, but also factors that increase vulnerability to FIMI by creating a more favourable environment for covert influence and delegitimizing narratives.

Third, the analysis demonstrates that financial transparency functions largely as a formal process rather than as a genuine accountability mechanism. Post-election reporting, delayed auditing, and the absence of dissuasive sanctions create a situation in which non-reporting or under-reporting produces no meaningful consequences for electoral contestants or candidates. From a FIMI perspective, this vulnerability creates a gap for untraceable funding and expenditures, including digital spending, and provides fertile ground for narratives and allegations concerning “dark money” and electoral manipulation.

Fourth, the media and digital environment is highly fragmented, polarized, and economically vulnerable, and is increasingly driven by attention-based logics that amplify emotional, antagonistic, or manipulative content. The lack of regulation of online political advertising, the role of third parties and surrogate

pages, and the use of influencers and intermediary networks blur the boundary between transparent political communication and covert influence.

Finally, the cross-border dimension—through campaigns targeting the diaspora or lobbying activities conducted abroad—emerges as one of the least regulated yet most sensitive aspects. These practices demonstrate that political influence no longer remains confined within national jurisdictions, and that the absence of transparency in these largely unregulated areas creates heightened risks for FIMI.

Overall, the report's findings indicate that a significant share of the key enablers and incentives identified in International IDEA's global methodology were present during the 2025 electoral cycle, including:

- institutional and regulatory enablers, such as low trust in institutions, insufficient regulation of political finance, and regulatory authorities that are not fully effective;
- societal and political environment enablers, including polarization, antagonistic discourse, and audience vulnerability to manipulation;
- media enablers, including limited pluralism, weak professional standards, and declining trust in mainstream news sources;
- digital enablers, such as fragmentation of the information environment, abusive exploitation of platforms, and inconsistent content moderation policies;
- legal and international enablers, particularly gaps in media and Internet regulation and unclear enforcement of international and EU norms;
- economic incentives linked to the attention economy, whereby media business models and the online political advertising market reward polarizing and high-engagement content;
- access to cross-border resources, including funding, information, and professional influence services; and
- the information manipulation industry, in which dedicated services (PR, lobbying, political and digital marketing) can be used to produce and amplify specific narratives.

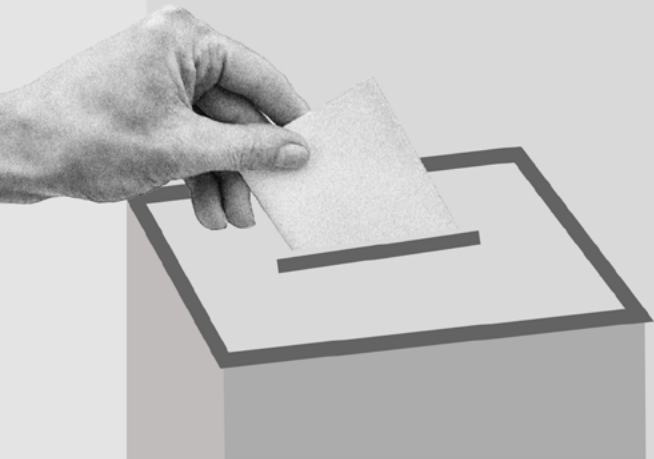
This demonstrates that exposure to FIMI is not linked to a single weakness, but to the cumulative interaction of multiple enablers and incentives across different areas of the domestic system, which are reproduced from one electoral cycle to the next.

In summary, the findings of this report show that electoral resilience in Albania remains weak. The system provides formal safeguards against classic electoral violations, but is less prepared for hybrid forms of influence that combine non-

transparent financing, digital amplification, narrative mediation, and cross-border action.

In this context, FIMI should not be viewed as an external threat detached from domestic realities, but as a phenomenon that exploits existing gaps, reinforced by political polarization, the attention economy, and the lack of compliance with European standards of digital regulation.

These conclusions can serve to inform further discussions on how democratic resilience may be strengthened, not only through legal reforms, but also through effective implementation, meaningful transparency, and enhanced institutional and societal capacities to counter information manipulation in future elections.



ALBANIA'S 2025 ELECTIONS:
VULNERABILITIES TO
FOREIGN INFORMATION
MANIPULATION AND
INTERFERENCE

